

COUNCIL OF EUROPE CONSEIL DE L'EUROPE

Strasbourg, 15th October 1963

EXP/V.Sp. (63) 19

Or. Eng.

COMMITTEE OF EXPERTS ON THE PRODUCTION AND MARKETING OF VINE PRODUCTS AND SPIRITUOUS LIQUORS

Observations presented by the Danish Delegation

relating to the document EXP/V.Sp. (63) 14, revised,
on spirituous liquors



COE018663

In document EXP/V.Sp. (63) 14, revised, the delegations are invited to submit in writing the amendments, which they want to suggest in the texts provisionally adopted by the Committee of Experts. Taking into consideration all the text of said document the comments of the Danish delegation are as follows:

Page 2, Improvers:

In the definition of "Improvers" we suggest to add the word "taste" within the brackets.

Page 5, Spirituous Liquors:

We suggest a minimum alcohol content of 23% by volume for spirituous liquors corresponding to the maximum alcohol content of wine fixed in Danish legislation.

Article 3,

Page 5, Alcohol:

The definition of alcohol in the formulation discussed by the Committee does not include synthetic alcohol. From both technical and economic points of view this is not appropriate, because:

1. Modern methods of rectification make it possible to purify ethyl alcohol so effectively that the original raw material cannot be detected neither by chemical analysis nor by smell or taste. It will therefore be impossible to control effectively, whether the alcohol used for the production of a spirituous liquor is synthetic alcohol or alcohol of another origin.
2. Synthetic alcohol cannot be considered as injurious to health. The pharmacopoeia in the United Kingdom and in the Scandinavian countries permits the use of synthetic alcohol for the production of medical preparations.

3. The production costs of synthetic alcohol are lower than the production costs of fermentation alcohol.
4. If the contracting countries forbid the use of synthetic alcohol for the production of spirituous liquors, it will mean a disadvantage in competition compared with corresponding industries in non-contracting countries permitting the use of synthetic alcohol. Normally there will be no control with the type of alcohol used for the manufacture of the exported products.
5. The proposed definition of alcohol includes sulphite alcohol, to which we quite agree. If, however, the opposition against synthetic alcohol is motivated by the raw material ethylene gas we would like to emphasize that sulphite alcohol is produced from sulphite lyes, a waste product from the cellulose production, which cannot be considered as a "cleaner" product than ethylene gas. In fact both products can be transformed by fermentation or synthesis to pure ethyl alcohol.

In the preamble to the convention it is emphasized among other things that the purpose of the convention is to safeguard public health. The approval of synthetic alcohol will be no obstacle to this purpose. Further synthetic alcohol is cheaper than fermentation alcohol. We therefore propose to add the following sentence to the definition of alcohol:

"Each contracting party is authorized to permit the use of synthetic alcohol complying with the same standards of purity."

Page 5, Spirits:

The words in brackets "with or without the addition of other substances" must be retained, because otherwise the definition would not comprise "b (3) other spirits".

Page 6:

To clarify that the list is not exhaustive we suggest to substitute the words "among natural spirits are" for "natural spirits include".

The same words must be inserted in Section VIII after the definition of Cereal spirits and before the definitions of Whisky and Korn.

Page 8-9, Rum or Tafia:

In Denmark the term "rum" without geographic qualification is also used to designate a product made from rum, alcohol and aromatic substances. As the definition of rum adopted by the committee does not include such products we propose to include a definition of rum also under heading b.3, II.

Page 12, (b.3) Other Spirits

(I) obtained by a special distilling process:

As aquavit may be obtained by a process similar to that described in this section we suggest to insert:

5. Aquavit: spirits whose characteristic aroma is derived from herba or grains such as caraway, fennel, anised, etc.

Page 14, (II) Flavoured:

Substitute the words "among these are the following" for "they include".

In the definition of aquavit delete the word "generally" in the first line and delete the sentence "The use of synthetic flavouring matter is prohibited", as this follows from the definition of flavoured spirits.

Insert as No. 3 a definition of rum.

Page 16,

(III) Obtained by some other process:

Substitute the words "among these are the following" for "these include the following".

As unflavoured aquavit corresponds to alcohol diluted to a degree suitable for consumption in the same way as "Klarer" we suggest to add the words "and aquavit" in paragraph III, section 2.

(b.4) Artificially flavoured spirits:

Among the three proposals of the Working Party we prefer No. 1, which will include the artificially flavoured spirit under article 3 d.

Page 18, Liqueurs:

Regarding minimum alcohol content in liqueurs we refer to our remarks under heading "spirituous liquors" above and propose 23% by volume. Further we propose a minimum sugar content of 350 grammes per litre for "cream liqueurs" instead of 400 grammes per litre and a minimum alcohol content of 23% by volume.

The classification of liqueurs in "natural" and "synthetic" we find superfluous. In general it does not seem reasonable to forbid the use of synthetic substances, because under certain circumstances they will be able to improve the quality of the product as is the case for instance when vanillin is substituted wholly or in part for vanilla. In case the synthetic substances should be injurious to health we take it for granted that their use will be regulated by the health authorities.

Page 19, (a) Alcohol:

In accordance with the definition of alcohol proposed above the synthetic alcohol must be included in this paragraph by formulating line one and two of section 1 as follows:

"Alcohol is obtained by synthesis or by distillation and rectification from the following raw materials:"

Further the raw material ethylene must be mentioned at the end of this section.

Page 20, (a) Alcohol (continued):

In section 2, line 4, a minimum alcohol content of 96% by volume is proposed. We would prefer 95% by volume.

Page 22, Article 6:

We propose to formulate paragraph 1, section 1, of this article as follows:

"Except as provided in Article 7, spirituous liquors consigned in bottles or other containers must be accompanied as far as the retailer by a (document) (invoice) which shall mention at least the name and address of the consignor and of the consignee, the volume and a denomination sufficient to characterize the product (trade mark, brand name, etc.)".

Especially when using modern office machinery it will not be practical to claim long individual texts on the documents.

As regards the indication of the volume claimed in the same section we presume that it will be sufficient to use the description of the capacity of the bottles, which is normal in continental countries, such as 1/1, 1/2, 3/8, etc.

Article 7:

In the lines 1 to 6 we propose to write as follows:

"When spirituous liquors are placed on the wholesale market or offered for retail sale in bottles or other securely closed containers not exceeding (5) litres

in capacity, the said bottles or containers, if intended for resale to the consumer in the same state, shall bear on the label or branded on the bottle in clear and indelible type at least the following indications:"

and to clarify what is meant by the words "clear type" we propose to claim a height of the types of at least 3 mm.

Page 23, Spirit with added alcohol:

Delete the words "used in conjunction with a reference to the addition of alcohol."

Flavoured Spirits:

Delete the words "accompanied by a form of words to be laid down by each Contracting Party showing that it does not belong to the preceding category (for example "compound" or prepared cool)".

In section (b) insert "producer and wholesaler".

As to section (c) we refer to our above comments regarding capacity of the bottles.

Page 24, Special Article:

In Denmark the term "Brandy" without qualification is used not only for spirits obtained from wine or distilling wine, but also for products composed of spirits and alcohol of national origin. Consequently, it would be contrary to Danish commercial practice to restrict the word "Brandy" to be used exclusively for said products, and therefore we cannot accept the formulation of paragraph 1 of this article.

As to paragraph 4 we find it superfluous to add the word liqueur, and finally we take it for granted that it will not be allowed to use geographic denominations, for instance cognac, to designate a product composed of spirits obtained from wine (or distilling wine) and alcohol.

Copenhagen, 3rd October 1963.