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Summary of the Liquor Products Act Amended Regulations, 2025¹

The Liquor Products Act Amended Regulations, 2025², introduce significant changes to the existing regulations, initially published in Government Notice No. R.1433 of 29 June 1990, and subsequently amended multiple times up to July 2023. These amendments, made by the Minister of Agriculture under section 27 of the Liquor Products Act, 1989 (Act No. 60 of 1989), cover a wide range of aspects related to liquor products, from definitions and production requirements to labelling, packaging, and enforcement.

Here's a summary of the key amendments:

- **New Definitions Introduced:**
 - *"agave classes"* refers to classes specified in regulations 10A to 10N.
 - *"beer classes"* refers to classes specified in column 1 of Table 3B.
 - *"flavoured spirits"* includes brandy, whisky, cane spirit, rum, gin, and vodka that have been flavoured.
 - *"Hop products"* are products made from hops, including pellets and extracts.
 - *"Hops"* are defined as hop cones, the dried female flower clusters of the hop plant (*Humulus lupulus*).
 - *"prepackaged"* means a liquor product packaged for sale to the consumer in that packaging material.
 - *"traditional African beer classes"* refers to classes specified in column 1 of Table 3C.
 - *"WCA"* means the Wine Certification Authority established in terms of section 2 of the Act.
- **Amendments to Product Requirements:**
 - **Natural Wine:** Must be a natural wine unless expressly provided otherwise in column 2 of the table for the class concerned.
 - **Alcoholic Apple Beverage:** Now includes requirements for fruit juice derived from pears or grapes or added alcoholic pear or unspecified alcoholic fruit beverage derived solely from grapes.
 - **Other Fermented Beverages** (New Regulations 8A, 8B, 8C):
 - Must have a volatile acid content of not more than 1.2 gram per litre.

¹ Source: Google NotebookLM

² Source: https://www.gov.za/sites/default/files/gcis_document/202503/52263rg11809gon5976.pdf

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- **Mead classes:** Produced from honey and water, with specific alcohol content (3.5% to 18%) and other requirements (e.g., specific requirements in Table 3A).
- **Sacramental Alcoholic Beverage:** Produced from fermented fresh grape juice (pasteurised) with added cane sugar (max 45% of total sugar content from cane sugar) or pasteurised wine, with alcohol content less than 16.5%.
- **Orange Juice and Sugar Fermented Alcoholic Beverage:** Produced from fermented fresh orange juice with added cane sugar (at least 10% total sugar from orange juice) and alcohol content not more than 18.0%.
- **Rice Fermented Alcoholic Beverage:** Produced by alcoholic fermentation of rice, Aspergillus-propagated rice grain, yeast, and potable water, with alcohol content less than 22%.
- **Kombucha and Sugar Fermented Alcoholic Beverage:** Produced from fermented kombucha and cane sugar, with alcohol content not more than 5%.
- **Grain Fermented Alcoholic Beverage:** Produced from fermented wort of raw grains, without hops or hop products, alcohol content 0.5% to 15.0%, and a distinctive taste/aroma.
- **Sugar Fermented Alcoholic Beverage:** Produced from fermented sugar from a plant source and potable water, without hops or hop products, alcohol content 0.5% to less than 16.5%, and a distinctive taste/aroma.
- **Beer:** Must be a class specified in Table 3B, comply with requirements in Table 3B, and have alcohol content 0.5% to 15.0% and volatile acid content not more than 1.2 g/L.
- **Traditional African Beer:** Must be a class specified in Table 3C, comply with Table 3C requirements, and have volatile acid content not more than 1.2 g/L.
- **Spirits:**
 - **Agave classes** (e.g., 100% agave spirit, silver, gold, aged, extra-aged, ultra-aged, crystal, as well as general agave spirit categories like silver, gold, aged, extra-aged, ultra-aged, crystal agave spirit) are introduced with specific production methods (distilled from agave hearts, or 51% agave hearts combined with other vegetable articles), residual sugar content (1.0 g/L or 100.0 g/L if flavoured), and alcohol content (at least 35%). Aging requirements for "aged"

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classes are specified (e.g., at least 2 months in oak casks for "aged," 12 months for "extra-aged," 3 years for "ultra-aged").

- **Other Spirits:** Amendments to residual sugar content and alcohol content for various spirits including:
- **Grape spirit:** Alcohol content at least 40% and residual sugar not more than 1.0 g/L.
- **Premium husk spirit:** Alcohol content at least 38% and residual sugar not more than 15.0 g/L.
- **Pot still brandy:** Alcohol content at least 38% and residual sugar not more than 15.0 g/L.
- **Brandy:** Alcohol content at least 40% (35% if flavoured) and residual sugar not more than 15.0 g/L (100.0 g/L if flavoured).
- **Whisky:** Alcohol content at least 40% (35% if flavoured) and residual sugar not more than 1.0 g/L (100.0 g/L if flavoured).
- **Malt whisky:** Alcohol content at least 40% and residual sugar not more than 1.0 g/L.
- **Grain spirit:** Alcohol content at least 40% and residual sugar not more than 1.0 g/L.
- **Cane spirit:** Specific raw materials (sugar cane juice, molasses, syrup) are defined, and granulated sugar or manufactured syrups are excluded. Alcohol content is at least 40% (35% if flavoured), and residual sugar not more than 15.0 g/L (100.0 g/L if flavoured).
- **Rum:** Specific raw materials (sugar cane juice, molasses, syrup) are defined, and granulated sugar or manufactured syrups are excluded. Alcohol content at least 40% (35% if flavoured) and residual sugar not more than 20.0 g/L (100.0 g/L if flavoured).
- **Vodka:** Alcohol content at least 40% (35% if flavoured) and residual sugar not more than 8.0 g/L (100.0 g/L if flavoured).
- **Unspecified spirit:** Alcohol content at least 40% and residual sugar not more than 1.0 g/L, with a methanol limit.
- **Absinthe:** New regulation 20A defines production methods (distillation/redistillation with common wormwood, anise, and other flavourings), requires a predominant absinthe taste/aroma, at least 20 mg/L thujone, residual sugar not more than 35.0 g/L, and alcohol content at least 45%.
- **Gin:** Regulation 21 substituted to detail production methods (distillation/redistillation with juniper berries and other flavourings, or admixing distillates with neutral spirit). Unless flavoured, it must

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have a predominant juniper taste/aroma. Residual sugar not more than 1.0 g/L (100.0 g/L if flavoured), and alcohol content at least 40% (35% if flavoured).

- **Spirit-based Liquor:** Liqueur, cream liqueur, and dairy-free liqueur must have a sugar content of at least 75 g/L. Flavour, taste, and character must be clearly distinguishable from wine. Transitional provision allows spirit cocktails to comply with old regulations until 31 December 2025.
- **Substance Additions and Removals:**
 - Allows for the addition of substances (e.g., other fermented beverages, beer classes, traditional African beer classes) to unfinished products or raw materials. All added substances must be food grade.
 - Similarly, substances can be removed from unfinished products or raw materials for other fermented beverages, beer, and traditional African beer classes.
 - Table 6 lists **permitted substances for addition** to liquor products, specifying the liquor products to which they can be added, and the manner and conditions of addition (e.g., acacia gum, acesulfame potassium, active carbon, caramel, caffeine, dairy products, flavourings, fruit juice, honey, hops, sugar, sulphites, etc.). Specific limits and labelling requirements are included for some substances like caffeine.
 - Table 7 lists **substances that may be removed** from liquor products, and the methods for removal (e.g., alcohol, bacteria, cloudiness, heavy metals, organic acids, sulphur dioxide, tartrates, undesirable flavours, water). Specific conditions and notes apply to removal processes.
- **Labelling and Presentation:**
 - Mandatory label particulars now include the expression "**contains sulfites**" or "**contains sulphites**" and the **filling date or best before date or production date**.
 - **Class designation** for wine can be omitted until 31 December 2027, with exceptions for specific wine classes (e.g., skin macerated white, sparkling wines, sweet natural wines).
 - Sulphite indication is only required if sulfur dioxide concentration exceeds 10 mg/L.
 - Filling/best before/production date can be omitted for wine or spirit in glass containers.

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- Label particulars must be in the same field of vision, with exceptions for sulfites, lot identification, and dates.
- Specific letter sizes for indications on labels are provided in Table 9, varying by container capacity.
- **Detailed rules for class designations:**
 - **Wine:** Specific conjunctions for "methode ancestrale" with "perlé wine" or "sparkling wine". "Spirit" in spirit-barrel-aged wine designation must be replaced by the spirit's name.
 - Rosé wine from white wine aged in wooden casks, previously used to age red wine: Specific class designation formats like "rosé wine" in conjunction with "from red wine casks" or "from white wine aged in red wine casks" are specified.
 - **Spirit:** Applicable designation specified in the title of the relevant regulation.
 - **Spirit-based liquor:** Spirit name must be used in conjunction with "aperitif" for spirit aperitifs, unless in descriptive text.
 - **Other fermented beverages:** Specific expressions like "alcoholic honey beverage" or "mead" for mead classes, "sacramental alcoholic beverage," "orange juice and sugar fermented alcoholic beverage," "rice fermented alcoholic beverage" (or "sake" if filtered), "kombucha and sugar fermented alcoholic beverage," "flavoured grain fermented alcoholic beverage," and "flavoured sugar fermented alcoholic beverage".
 - **Beer and Traditional African Beer:** Applicable designations from Tables 3B and 3C.
 - **Flavoured Spirits:** If brandy, whisky, vodka, cane spirit, agave class, rum, or gin is flavoured, the base spirit's name must be used in conjunction with the flavouring name(s) and "flavoured" or "infused" (or "spiced" if applicable). The spirit name can be used alone in descriptive text if it clearly states it has been combined with flavourings.
 - **Coloured Spirits:** If a spirit is coloured, the colourant name can only be used if it's clear it was primarily used as a colourant.