



27 October 2017

TO WHOM IT MAY CONCERN

The Scotch Whisky Association is the trade association of the Scotch Whisky industry. Its 68 members account for over 90% of Scotch Whisky production. The Association has been set up by its members to protect and promote the Scotch Whisky industry.

Scotch Whisky is a geographical indication of origin and only whisky produced in Scotland may be sold under that description. It is defined by the UK Scotch Whisky Regulations 2009. In particular Regulation 3.1(h) permits the addition of plain caramel colouring to Scotch Whisky. Along with water, it is the only permitted additive.

The purpose of adding caramel at the time of bottling is to ensure that each brand of Scotch Whisky has a consistent colour. Scotch Whisky derives its principal colour from the casks that it is aged in. Without the addition of caramel, there might be minor differences in the appearance of different batches due to the different casks that are used. The caramel does not affect the aroma or flavour of the spirit.

The addition of caramel is seen as part of the bottling rather than the production process. One can only assess whether caramel needs to be added by looking at the spirit immediately prior to bottling. This practice has been used for many years in many different markets without complaint. Even if caramel is added to Scotch Whisky overseas, the spirit retains the essential characteristics that derive from its distillation and maturation in Scotland and it should be considered a Scottish product.

Yours faithfully

Art. 4.1(b)



Chief Executive

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