



Guidance on Labelling Gin Liqueurs and Spirit Drinks

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Buckinghamshire&Surrey
trading standards

Promoting EXCELLENCE IN GIN DISTILLATION



Spirits Drinks Regulations 2008 (Statutory Instrument 2008/3206)

Assimilated Regulation 110/2008 (retained by the EU (Withdrawal) Act 2018 and assimilated by the Retained EU Law (Revocation and Reform) Act 2023)

The Food Information Regulations 2014

With the growing popularity of Gin in the UK market, there has been an increase of products marketed as 'Gin' or 'Gin liqueurs' which do not meet the necessary labelling requirements.

This guide has been produced to clarify the labelling requirements for these alternative products, taking into consideration the requirements of the Food Information to Consumers Regulation (1169/2011), the Spirit Drinks Regulation (110/2008), and the implementing Regulation laying down rules for the application of 110/2008 (716/2013). These regulations have been incorporated into domestic law for Great Britain following EU Exit, subject to operability amendments, with the directly applicable EU regulations continuing to apply in Northern Ireland.

New labelling provisions in Regulation 2019/787, were due to come into force in May 2021, however, due to the UK EU Exit, these Regulations will not become applicable in Great Britain. They will however, due to the Protocol, apply in Northern Ireland.

The legislation sets out definitions and descriptions for spirit drinks manufactured and marketed in Great Britain, as well as the requirements for labelling and presentation, so as to ensure customers are fully aware of what they are buying.

Sales Denomination

All spirit drinks must have a Sales Denomination (SD) which is the legal name under which the product is sold. The product must meet all the requirements laid down in the category for that SD. Where a spirit drink does not fit any of the categories, the SD “Spirit Drink” shall be used.

For a product to be marketed as a “gin” the product must meet the requirements laid down for that category, including having an alcohol content of at least 37.5%.

If the alcohol content is less than 37.5%, it cannot be called Gin, however if it is over 15%, and fits the definition of a spirit drink, in Article 4 of Regulation 110/2008 it must use the sales denomination ‘spirit drink’, if it does not qualify for any other category in Annex II of Regulation 110/2008.

Where the product has an alcohol content less than 15% but more than 1.2%, it does not qualify as a spirit drink and would be considered to be an alcoholic beverage, and can only be described as such.

For the SD “liqueur” to be used, the product must meet the description for the category. This is described as a spirit drink, with a minimum sugar content, in most cases, of 100 grams per litre; The minimum alcoholic strength by volume of liqueur has to be 15%. The full specifications are at category 32 of Annex II of Regulation 110/2008.

If a product does not meet the requirements of an SD then the term cannot be used on product.

Products cannot be described by use of words ‘like’, ‘type’, ‘style’, ‘made’, ‘flavour’ or any other similar terms - for example, ‘Gin Flavour’.

The legal definitions for ‘Gin’, ‘Distilled Gin’, and ‘London Gin/London Dry Gin’, are listed at categories 20-22 of Annex II of Regulation 110/2008.



Sloe Gin

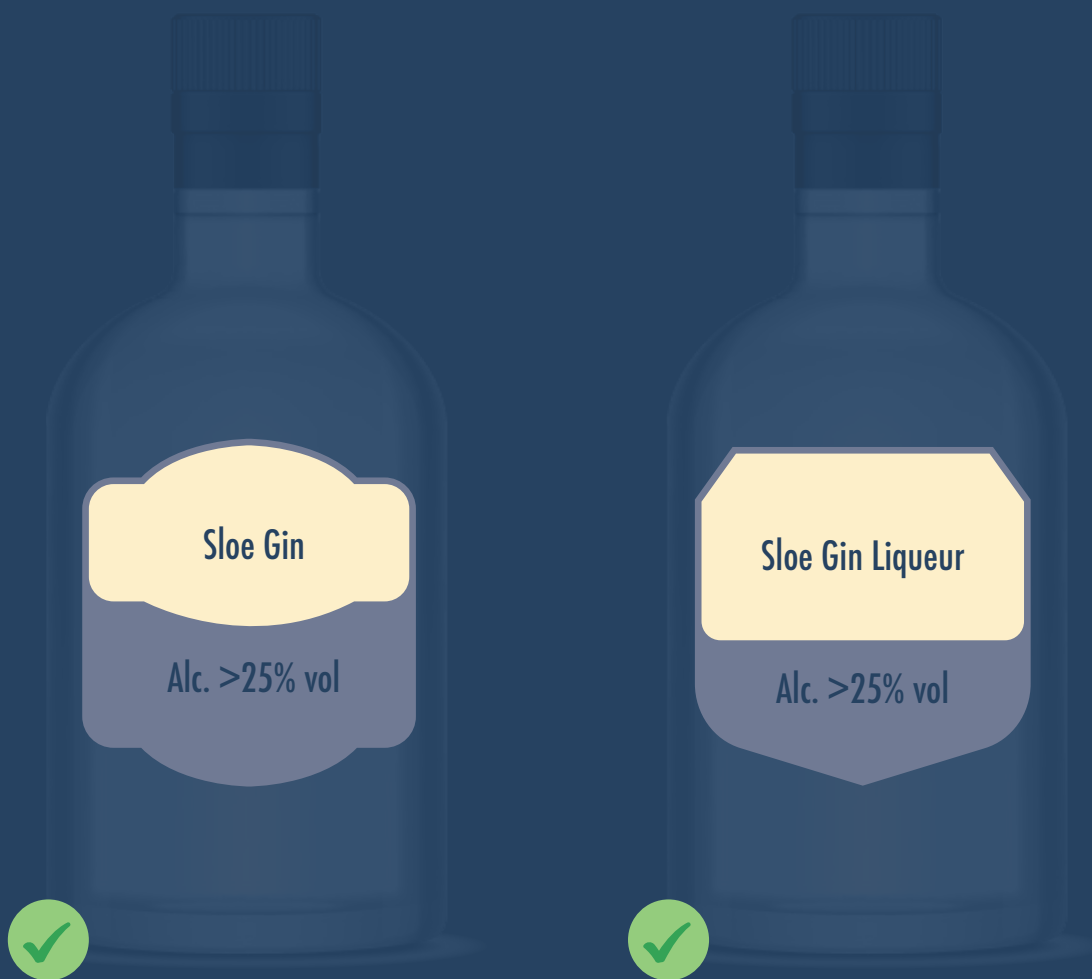
The exception (the only one), to the minimum 37.5 ABV requirement, is sloe gin.

Given the historical nature of sloe gin, when the regulations were first formulated, like many other spirits at that time, a special provision was made for sloe gin.

The full specifications for Sloe Gin are at category 37 of Annex II of Regulation 110/2008 (as category 35 of Annex I to EU Regulation 2019/787 as noted was not implemented by 31 12 20), and provides that this name can be applied to a liqueur produced by maceration of sloes in gin (with the possible addition of sloe juice), and subject to there being a minimum alcoholic strength by volume of 25 %.

Only natural flavouring substances and flavouring preparations may be used in the production of sloe gin.

The sales denomination Sloe Gin may be supplemented by the term ‘liqueur,’ so the SD “Sloe Gin Liqueur” is permitted. The term could not, however, be used in combination, as part of a compound term, describing an alcoholic beverage.



Compound Term

A product with an alcohol content less than 37.5% will be unable to use ‘Gin’ as part of the SD.

However, if Gin (37.5%) is used to make a product, then this may fall within the compound term (CT) provisions.

Compound terms are used to describe products resulting from the addition of certain foodstuff(s) to a spirit drink that would thus no longer be entitled to be defined as such.

The Compound term can be used to supplement the SD to provide a more descriptive name, which can provide a more attractive marketing term for customers, whilst providing more detail on the product.

The CT consists of a combination of an SD, such as “Gin”, with one or more foodstuffs and/or the term liqueur

A CT cannot be used to replace the SD. It is there to provide an additional description for the product. There are some specific rules on the use of the compound terms.

The CT describing an alcoholic beverage shall appear in uniform characters of the same font, size and colour. It shall not be interrupted by any textual or pictorial element which does not form part of it and shall not appear in a larger font size than that of the sales denomination (Article 3(4) Regulation 716/2013).

The SD does not need to appear directly alongside the CT, but, to comply with this guidance, should appear on the front of the product so as to avoid misleading the consumer about the nature of the product.

Where a category spirit drink, such as gin, is used in a compound term, all of the product’s alcohol must be derived from gin.



Allusion

‘Allusion’ means a direct or indirect reference to one or more spirit drink categories, other than a reference in a compound term or list of ingredients. As an example, this could be if the company name referenced ‘Gin’ such as the example of “The Midshire Gin Company”.

Where there is an allusion to any spirit drink category on the labelling of an alcoholic beverages, the allusion must appear in a font size smaller than the font used for the sales denomination and compound term (Article 4 Regulation 716/2013).

Gin Liqueurs

Gin based drinks may have a SD of “Spirit Drink” or “Liqueur.” To use The SD “Liqueur” it must fit the description for the category, otherwise it would be defined as a Spirit Drink. A compound term can be added so as to provide a more detailed description of the product. Given that the SD is the legal name of the product, it should be clearly shown on the front label as an integral part of the product description.

The new labelling provisions in Regulation 2019/787, which would permit the term Gin Liqueur as an SD, were due to come into force in May 2021, however, due to EU Exit, the Regulations will not become applicable in Great Britain. They will however, due to the Protocol, apply in Northern Ireland.

Any businesses that sell relevant products in Great Britain and who have amended their label to comply with the 2019 requirements should ensure that they meet the provisions of the retained regulation 110/2008, as set out in this guidance.



Misleading Packaging and Labelling

The Food Information Regulations 2014 state that food information should not be misleading. This includes the presentation of foods, in particular their shape, appearance or packaging, the packaging materials used, the way in which they are arranged and the setting in which they are displayed.

The labelling of a gin liqueur should not be misleading to consumers and the label and packaging as a whole, would be taken into consideration when enforcement bodies are making a judgement under the general food labelling rules. Examples could be pictorial representations on the label, or shape and colour of the bottle which could mislead customers.

The ABV must be in the same field of vision as the SD and the net quantity marking, meaning that a consumer must be able to hold the product and be able to see all the information at the same time. **Examples:**



Complies with requirements? **Yes**



Complies with requirements? **No**

Here the alcohol content is too low to be called Gin.
Gin Liqueur is not a permitted SD, it should be liqueur
The CT could be Elderflower Gin Liqueur, with an SD of Liqueur



Complies with requirements? **No**

The product cannot be called Gin as the alcohol content is too low
Also the SD cannot be Gin Liqueur, and should be simply Liqueur



Complies with requirements? **No**

The characters of the CT should be uniform, and no larger than the SD.
This label may mislead consumers into thinking they are buying gin.



Complies with requirements? **Yes**

The company name is an allusion to Gin. No CT is used and the product is simply described as a Cherry Liqueur. The allusion to gin is in a smaller font than the SD, thus acceptable.



For more information,
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