

15<sup>th</sup> July 2008

European Commission  
DG Enterprise and Industry (ENTR/I/5)  
100, Rue Belliard/Belliardstraat 105  
B-1049 Brussel/Bruxelles  
Belgium

Dear Sirs

**KEY ISSUES CONCERNING THE SIMPLIFICATION OF 8 DIRECTIVES ON MEASURING INSTRUMENTS - STAKEHOLDER CONSULTATION**

Firstly we would like to thank-you for allowing us this opportunity to respond to the above consultation.

The Scotch Whisky Association is the leading representative body in the Spirits Sector covering over 98% of whisky production by volume, representing distillers, bottlers, blenders, brokers and brand owners of Scotch.

Glass alcohol hydrometers and alcohol tables are extensively used by the Scotch Whisky industry throughout the production process - distillery, still houses and warehouses. For example, glass alcoholmeters are still used routinely in distillery spirit safes to monitor and control the spirit production process. Density hydrometers are also used to monitor the specific gravity of fermentations. Alcohol meters are also important for declaring the amount of alcohol produced for duty purposes prior to warehousing, and is a fundamental requirement of HM Revenue and Customs (HMRC).

The main benefits of these types of instruments to our sector are that they are accurate and reliable and are also relatively inexpensive, compared with electronic density meters. They also require no batteries or power, and can be disposed of as ordinary controlled waste.

Other measuring instruments routinely used by the industry include electronic density meters (eg Paar 5000), Near Infra Red spectrometry, or other equipment approved by HMRC for these purposes. Regulation EC2870/2000 on methods of analysis for Spirit Drinks has 3 methods for alcohol measurement in final products based on pycnometers, (b) density meters or (c) hydrostatic balance.

The Scotch Whisky Industry extensively uses alcohol meters and alcohol tables and these instruments must continue to be available to our sector whatever option the European Commission decides to take forward. Furthermore any future policy should not stifle innovation where our industry can see benefits in utilising alternative instruments for measurement.

Yours Faithfully,

Morag Garden  
Environmental and Scientific Affairs Manager