

### October 27, 2016

#### Tips for Using the Newest Features in COLAs Online

On September 23, 2016, we released COLAs Online version 3.12.4. COLAs Online is TTB's Web-based system for applying for a COLA (certificate of label approval, certificate of exemption from label approval, and distinctive liquor bottle approval).

Three main areas changed with this release:

- 1. Removal of some data fields;
- 2. Addition of dropdown menus for selecting domestic appellations of origin for wines; and
- 3. Re-design of the formulas section.

These changes are part of our larger plan to reduce the amount of time it takes to obtain label approval from TTB. By decreasing the amount of information we require you to submit and adding tools to assist you with the accuracy of the information you supply, we are lowering the chances that we will have to send your application back for correction.

For a comprehensive overview of these changes, please review the Software Release Notice. Read on for more background on why we made these changes and for tips about how to navigate the latest version of COLAs Online.

# Removal of Data Fields From COLAs Online and The Printable Version of TTB Form 5100.31.

We no longer require you to supply the following information when applying for a COLA:

- Alcohol content
- Net contents
- Vintage date (grape wine)
- Fax number

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When considering what fields we could eliminate, we chose fax number because we rarely use that method to contact industry members any longer. Next we evaluated what label information we allow industry members to change as an allowable revision. Under this policy, industry members may change the alcohol content, net contents, and vintage date (among other things) on a previously approved label without getting a new COLA. As a result, you may legitimately have a COLA that covers a label where the information you originally supplied as the alcohol content, net contents, or vintage date no longer matches one or all of those statements on the actual label. Because of this, we determined we could eliminate those fields from the application.

Previously you had to enter the alcohol content, net contents, and vintage date information as it appeared on the label, and if what you supplied did not match the information as shown on the label, we sent it back for correction. By eliminating the requirement that you supply that information, we have reduced the chances of you making an error that will require correction.

## **Tips:**

While these data fields were removed from COLAs Online, that did not affect the requirement that a statement of alcohol content and net contents appear on your labels when required by regulation.

If the information was considered **mandatory information** on the label before this release, it is **still mandatory information**; you just don't need to enter it as part of the application any longer.

For example, a statement of net contents is still required to appear on the label (or container) for all wines, distilled spirits, and malt beverages.

### Dropdown Menus For Selecting Appellations of Origin For Domestic Wine

When we evaluated all of the reasons why we send COLA applications back for correction, we discovered that about half of the time it is because of an error the submitter made on the application portion, rather than something being wrong with the actual label. One of the pieces of information we require you to submit for wine labels is the appellation of origin (if one appears on the label). If what you enter does not match the appellation appearing on the label we have to send it back to you for correction. In order to reduce the chances of such a mistake, we added a drop-down menu that limits your choices to only those states, counties, or viticultural areas that are approved for use on American wine labels. We added a similar tool in the past for indicating grape varieties used on domestic wine labels.

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# Tips:

You have six choices for entering an appellation of origin for domestic wine. The key is that what you select and enter **must match the appellation(s) of origin that appear on the label**.

- 1. **None (default)** When there is no appellation on your wine label "None" is the appropriate entry.
- 2. **American/Foreign Blend** Select this option on *blends consisting of American and foreign wines*, but ONLY if any reference is made to the presence of the foreign wine. The label must state the exact percentage by volume of each, for example: "50% American- 50% France", and you should enter the statement here exactly as it appears on the label.
- 3. American Select this option when the appelleation appearing on the label is "American."
- 4. **AVA** Select this option when one or more approved *American Viticultural Areas (AVA)* appear on the label. Select from the drop down single or multiple AVA names that match what appears on the label.
- 5. **State/County** Use this option when a *single or multiple county names* are used as the appellation on the label. First, find the appropriate state from the dropdown and then select the appropriate county. You may add between 1 and 3 counties, but they must all be in the same state.

County appellation selections will be displayed as both the state name and the county name, for example, "NY – Suffolk," even though only the county name is used as the appellation on the label. Many states have counties with the same names - be sure you've selected the county under the appropriate state on the list.

Also, the regulations require that the word "County" appear on the label together with the name of the county, but the word "County" will NOT be displayed with county name in COLAs Online or on the printable version of the COLA.

6. **Multi-state** – Select this option when either a *single state or multiple states* are used as the appellation on the label. You may add between 1 and 3 states.

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### Formula Section Re-design

Some of the most frequently cited reasons why we return COLA applications for correction revolve around the formula requirements for certain alcohol beverages. Often industry members either are not aware that formula approval is required prior to applying for label approval, or the applicant fails to supply the correct formula approval information. We've added some questions and links to guidance in COLAs Online to help prevent you from submitting a COLA application if you are required to get formula approval before applying for label approval.

# Tips:

Please carefully review the formula guidance documents available at the links – We have been making updates to the information so it may have changed since the last time you read it.

Currently, COLAs Online requires that both of the formula questions show the same response. The answer to the second question, "After reviewing the link do you require a formula?" will be used by the system to determine the answer shown for the first question, "Are there flavors and/or coloring added to your product?" regardless of how you answered the first question. We are working to revise this situation, but in the interim, please do not change the answer to the first question so that is does not match the answer to the second question, even if it is no longer accurate.

For example, if you answer "Yes" to the question, "Are there flavors and/or coloring added to your product?" but then review the documentation at the link and determine that a formula is not required for your product and you answer "No" to the question, "After reviewing the link do you require a formula?" COLAs Online will automatically change the answer to the first question to "No." **Please do not change the answer to the first question** back to "yes," even if you have added flavors and/or coloring material to your product, as you will get an error message when you attempt to go to the next step.

The same is true if you answer "No" to the first question and "Yes" to the second question. COLAs Online will automatically change the first answer to "Yes" and you will get an error message if you change it back to "No."

For more information about COLAs Online, contact us at **202-453-2250** or toll free at **866-927-ALFD (2533)**, or by email at <u>alfd@ttb.gov</u>. See our <u>customer service page</u> for more contact information.

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