



# Distilled Spirits Mandatory Labeling Webinar

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2018

# TTB Disclaimer



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## Notice:

This information is being presented to help the public to understand and comply with the laws and regulations that the Alcohol and Tobacco Tax and Trade Bureau (TTB) administers.

It is not intended to establish any new, or change any existing, definitions, interpretations, standards, or procedures regarding those laws and regulations.

In addition, this presentation may be made obsolete by changes in laws and regulations.

The sample labels in this presentation are for purposes of illustration only and do not represent actual labels.

Please consult the applicable laws and regulations for the most current requirements.

# TTB Mission

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TTB's statutory mandate is to prevent consumer deception and ensure that alcohol beverage labels provide consumers with adequate information as to the identity and quality of the product.

# Overview

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Mandatory Information

Organic Labeling

Additional Information

Q&A



# Mandatory Information

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ON BRAND/FRONT LABEL:

Brand Name

Class/Type

Alcohol Content

ON FRONT, BACK, SIDE LABEL:

Name and Address

Net Contents

Health Warning Statement

Country of Origin (imported)

27 CFR 5.32

# Mandatory Information (Continued)



Subject to certain exceptions, the following may appear on the brand label or a back label, if required:

- Sulfite Declaration
- Coloring or Flavoring Material
- FD&C Yellow #5
- Cochineal Extract or Carmine
- Treatment with Wood\*
- Percentage of Neutral Spirits
- Commodity Statement
- Statements of Age
- State of Distillation

27 CFR 5.32

\*Must appear on the brand label

# Brand Name

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Name under which the product is sold

May not create a misleading impression about the age, origin, identity, or other characteristics of the product

Must appear on the Front (Brand) Label

27 CFR 5.32

# Brand Name



Imported by XYZ Company  
Pittsburgh, PA 15122  
750 ml

**PRODUCT OF THE DOMINICAN REPUBLIC**

**GOVERNMENT WARNING:**  
(1) ACCORDING TO THE SURGEON GENERAL, WOMEN SHOULD NOT DRINK ALCOHOLIC BEVERAGES DURING PREGNANCY BECAUSE OF THE RISK OF BIRTH DEFECTS. (2) CONSUMPTION OF ALCOHOLIC BEVERAGES IMPAIRS YOUR ABILITY TO DRIVE A CAR OR OPERATE MACHINERY, AND MAY CAUSE HEALTH PROBLEMS.

The block contains product information: 'Imported by XYZ Company', 'Pittsburgh, PA 15122', and '750 ml'. Below this is the text 'PRODUCT OF THE DOMINICAN REPUBLIC' and a skull and crossbones logo with a red bandana. At the bottom is a 'GOVERNMENT WARNING' with two paragraphs of text.



# Class and Type

## Twelve Standards of Identity

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Neutral Spirits (Vodka)

Whisky

Gin

Brandy

Blended Applejack

Rum

Tequila

Cordials and Liqueurs

Flavored Brandy, Flavored  
Gin, Flavored Rum,  
Flavored Vodka, and  
Flavored Whisky

Imitations

Geographical  
Designations

Products without  
geographical designations  
but distinctive of a  
particular place

27 CFR 5.22

# Class and Type (Continued)



“Vodka,” “Chocolate Flavored Brandy,”  
“Imitation Liqueur”

For recognized cocktails, a statement of added colors and the class/type of the spirits is sufficient:

- e.g., Margarita made with tequila, triple sec liqueur, and FD&C Yellow #5

If the product does not fall under one of the standards of identity, the product must be designated with a truthful and adequate statement of composition, along with a fanciful name or designation in accordance with trade and consumer understanding,

Must appear on the brand/front label

27 CFR 5.35

# Class and Type



Imported by XYZ Company

Pittsburgh, PA 15122

750 ml

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# Alcohol Content

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- \_\_\_% Alcohol (ALC) by volume (VOL)
- Bottled at \_\_\_% Alcohol (ALC) by volume (VOL) (for products with significant amount of solid material)
- Proof (optional, additional statement)
- Tolerances
- Must appear on the front label

27 CFR 5.37

# Alcohol Content



Imported by XYZ Company

Pittsburgh, PA 15122

750 ml

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# Bottler/Importer Name and Address



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Name or trade name of bottler/importer as listed on permit

Address (City, State) of bottler/importer as listed on permit

“Bottled by,” “Distilled by,” “Produced by,” etc. for domestic spirits

“Imported by” or similar phrase for imported spirits

May appear on any label

27 CFR 5.36


# Name and Address



Imported by XYZ Company  
Pittsburgh, PA 15122

750 ml

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# Net Contents



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Metric standards of fill; authorized sizes per 27 CFR 5.47a

May be on label or etched/blown into the container

“ml” on containers of less than 1 liter; “1 L” or “1.75L” (or “Liter”) on containers of 1 liter or more

May appear on any label

27 CFR 5.38, 5.47a



# Net Contents

**Captain John's  
Spiced Rum**



Rum with natural flavors added  
**20% Alcohol by Volume (40 Proof)**

Imported by XYZ Company  
Pittsburgh, PA 15122  
**750 ml**

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# Health Warning Statement



May appear on brand, back or side label

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27 CFR 16

# Health Warning Statement (Continued)



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The words “GOVERNMENT WARNING” must be in capital letters and bold type

The “S” in Surgeon and “G” in General must be capitalized

Continuous statement (no intervening info)

Legible on contrasting background

Separate and apart

27 CFR 16

# Heath Warning Statement



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Pittsburgh, PA 15122

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# Country of Origin

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## Acceptable Formats:

- Product of Italy
- Produced in Japan
- Produced by XYZ, Bordeaux, France
- Jamaican Rum

Must be in English

May appear on any label

27 CFR 5.36

# Country of Origin



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# Coloring Materials

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Only allowed in certain products

The coloring material must be stated on the label; for example:

- Colored with Caramel
- Certified Color Added
- Artificially Colored

27 CFR 5.39

# FD&C YELLOW #5



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If FD&C Yellow #5 is added, the label must state:

- Contains FD&C Yellow #5

27 CFR 5.32



# Cochineal Extract/Carmines



If a distilled spirits product removed on or after April 16, 2013 contains cochineal extract or carmine, the label must include a statement to that effect, such as:

- “Contains Cochineal Extract,” or
- “Contains Carmine,” or
- “Contains Cochineal Extract and Carmine”

# Commodity Statement



For spirits produced by redistillation,  
blended whiskies, spirit whisky, and  
compounded gin:

\_\_\_\_\_ % Neutral Spirits Distilled from \_\_\_\_\_

\_\_\_\_\_ % \_\_\_\_\_ Neutral Spirits

For spirits produced by original distillation:

Distilled from \_\_\_\_\_

27 CFR 5.39

# Statements of Age

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Required for:

Whisky aged less than 4 years

Grape brandy aged less than 2 years

Distilled spirits labeled with a distillation date

Not allowed on all distilled spirits labels

27 CFR 5.40

# Organic Labeling



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The National Organic Program (NOP) is administered by the U.S. Department of Agriculture (7 CFR part 205)

Effective October 21, 2002, added Subpart I to Part 5 to cross-reference USDA's NOP rules

# Organic Labeling (Continued)



Must comply with USDA NOP standards

For certain organic claims, must obtain USDA-accredited certifying agent's (ACA) preview and approval of organic labels prior to submission to TTB

For more information, visit our Web site at [www.ttb.gov](http://www.ttb.gov), click on the DISTILLED SPIRITS tab, then click on the LABELING tab under Quick Links, and go to "Labels With Organic Claims".

27 CFR 5.71

# Additional Information

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Must be truthful, accurate, and specific

May not conflict with or qualify other mandatory information

Must comply with the corresponding sections of the regulations

27 CFR 5.33(f)

# Contact Information



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## Alcohol Labeling and Formulation Division, Customer Service:

- Phone: 1-866-927-2533 or 202-453-2250
- Option 2 – COLAs Online technical assistance
- Option 3 – COLAs Online registration
- Option 4 – Distilled Spirits Questions

# Thank you for attending

