

# WINE LABELING

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# TTB DISCLAIMER

## 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 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. Please consult the regulations for the most current regulatory requirements
- ▶ Sample labels are for illustrative purposes only and contain fictitious data.

# HOW TO GET IT RIGHT THE FIRST TIME!!

- **Mandatory Items for Typical (Standard) Wine Labels**
- **Top Reasons for Corrections for Oregon Wineries**
- **Allowable Revisions**

# MANDATORY LABEL INFORMATION

## Brand Label must have:

- ▶ Brand Name
- ▶ Class/Type Designation
- ▶ Appellation of Origin  
(under certain circumstances)

# MANDATORY LABEL INFORMATION

## Any Label

- ▶ Bottler's (or Importer's) Name and Address
- ▶ Net Contents
- ▶ Sulfite Declaration
- ▶ Alcohol Content
- ▶ Health Warning Statement
- ▶ Country of Origin Statement *Imports only*

# BRAND NAME

- Name under which the product is sold, usually the most prominent piece of information on the label.
- If there is no brand name, you may use the name of the bottler/importer if shown on the brand label
- May not create a misleading impression
- Must appear on the Brand Label



27 CFR 4.33

# BRAND NAME

## Front Label



## Back Label



**Produced And  
Bottled By  
Lighthouse Cellars  
Kingston, NY**

**Contains Sulfites 750mL**

**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.

# CLASS AND TYPE DESIGNATION

## CLASS

The broad category “wine” is divided, under standards of identity, into 9 defined classes, e.g., “Grape Wine,” “Aperitif Wine,” “Fruit Wine” etc.

## TYPE

Within a class, there may be several types. For example, “Table Wine” “Dessert Wine” , are types of grape wine.

27 CFR 4.34



# STANDARDS OF IDENTITY

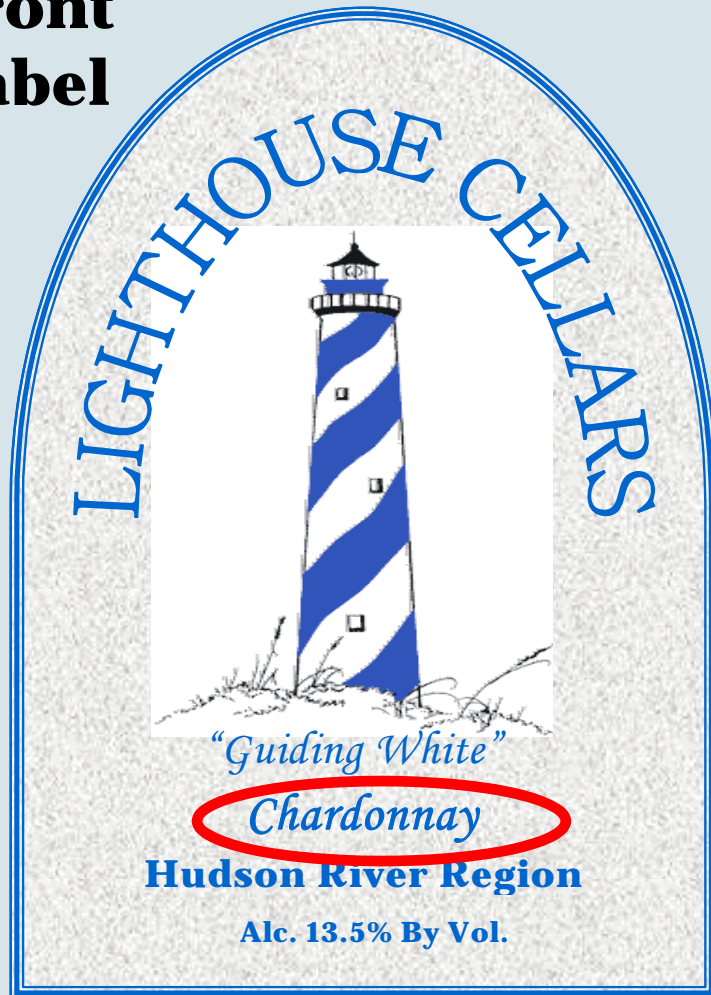
## Nine classes:

- Grape Wine
- Sparkling Grape Wine
- Carbonated Grape Wine
- Citrus Wine
- Fruit Wine
- Wine from Other Agricultural Products
- Aperitif Wine
- Imitation or Other than Standard Wine
- Retsina Wine

27 CFR 4.21

# CLASS/TYPE DESIGNATION

## Front Label



## Back Label



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**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.

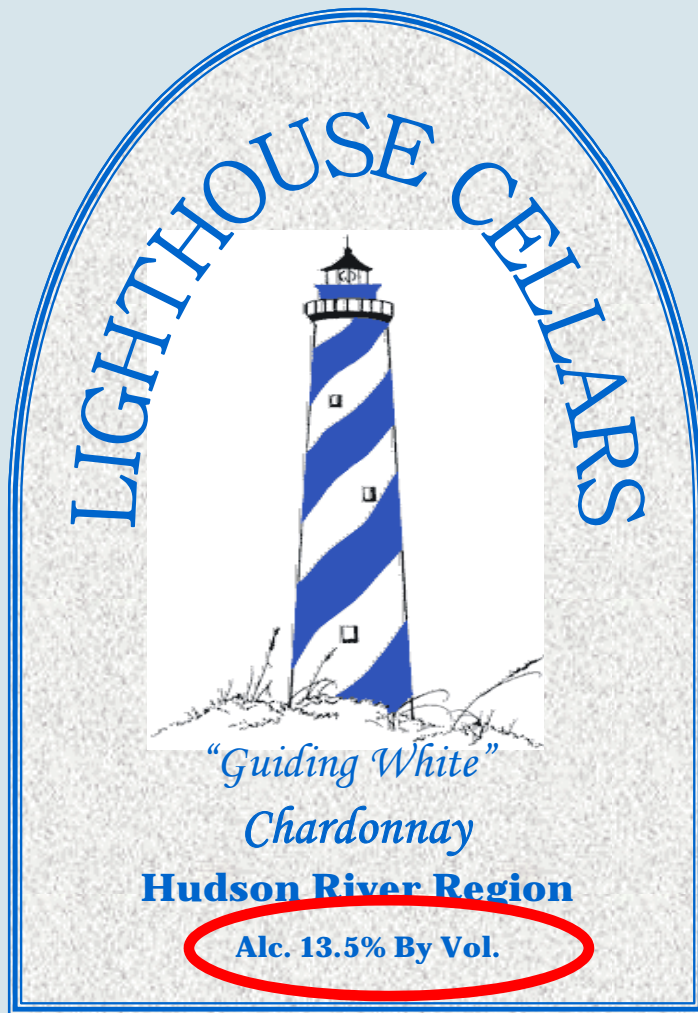
# ALCOHOL CONTENT

- **Table Wine may be used for wine with 7-14% alcohol by volume**
- **Alcohol \_\_% by volume or Alc. \_ % / vol.**
- **Alcohol \_\_% to \_\_% by volume, for ranges**

27 CFR 4.36

# ALCOHOL CONTENT

## Front Label



## Back Label



# APPELLATION OF ORIGIN

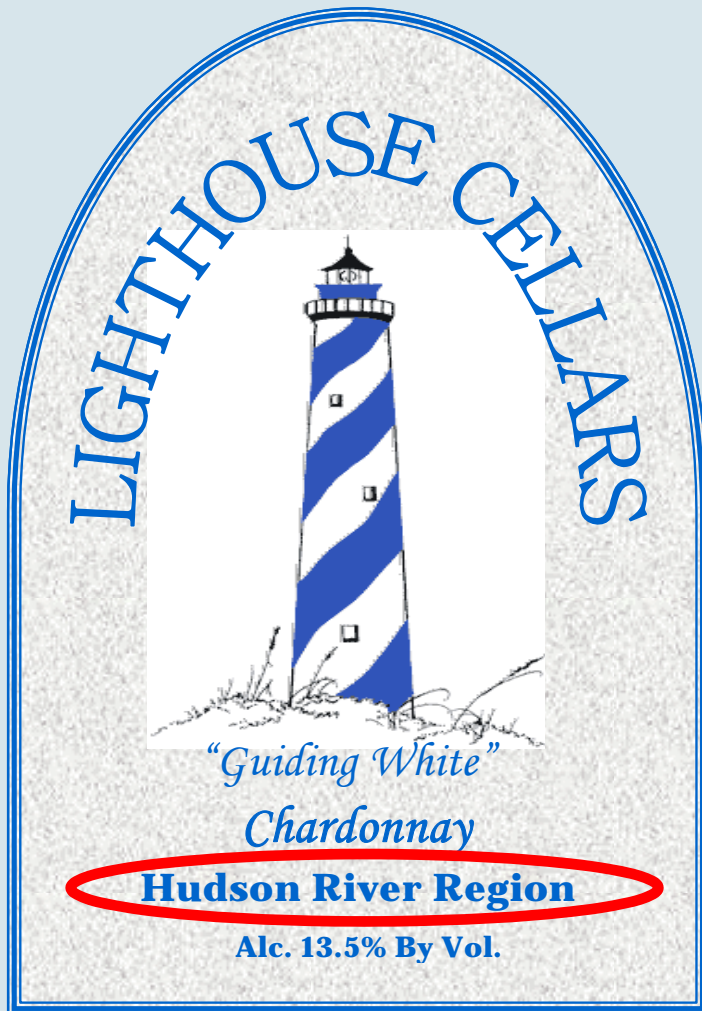
**Mandatory if any of the following appear on the label:**

- ▶ **Grape Varietal**
- ▶ **Vintage Date**
- ▶ **Semi-Generic Designation**
  - (if Grandfathered)
- ▶ **Estate Bottled (must be viticultural area)**
- ▶ **Must appear on the Brand Label**

**27 CFR 4.25, 4.23, 4.24, 4.26, 4.27, 4.34**

# APPELLATION OF ORIGIN

## Front Label



## Back Label



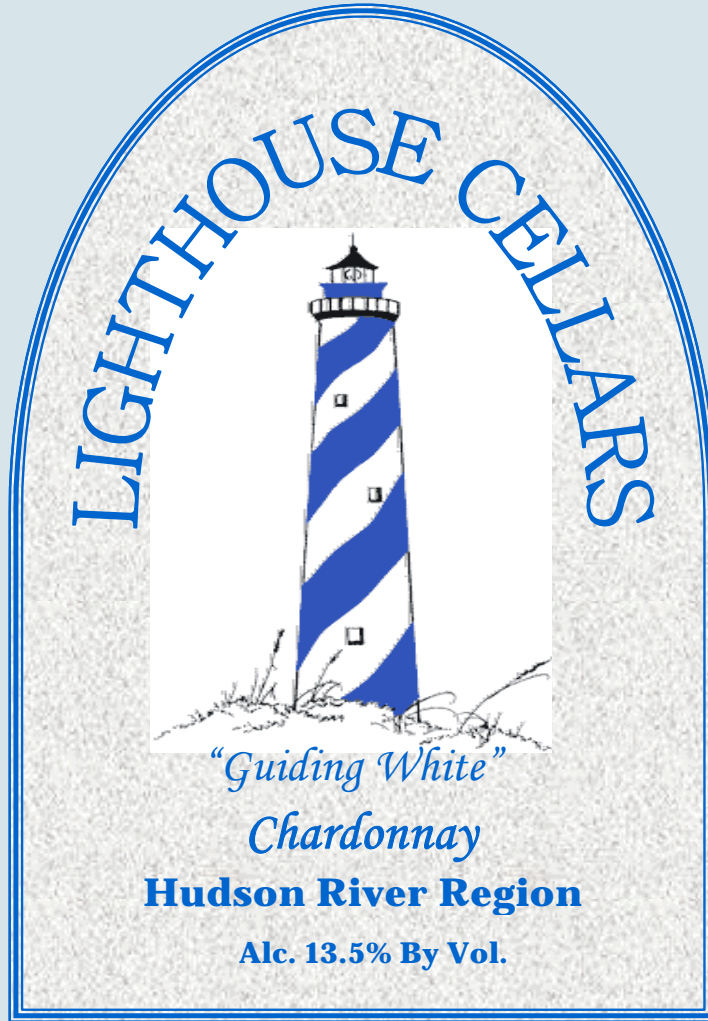
# NAME & ADDRESS STATEMENT

- Name or Trade name of the Bottler/Importer as listed on the permit
  - Address (City and State) of the bottler/importer as listed on the permit
- ▶ May appear on any label

27 CFR 4.35

# NAME AND ADDRESS

## Front Label



## Back Label





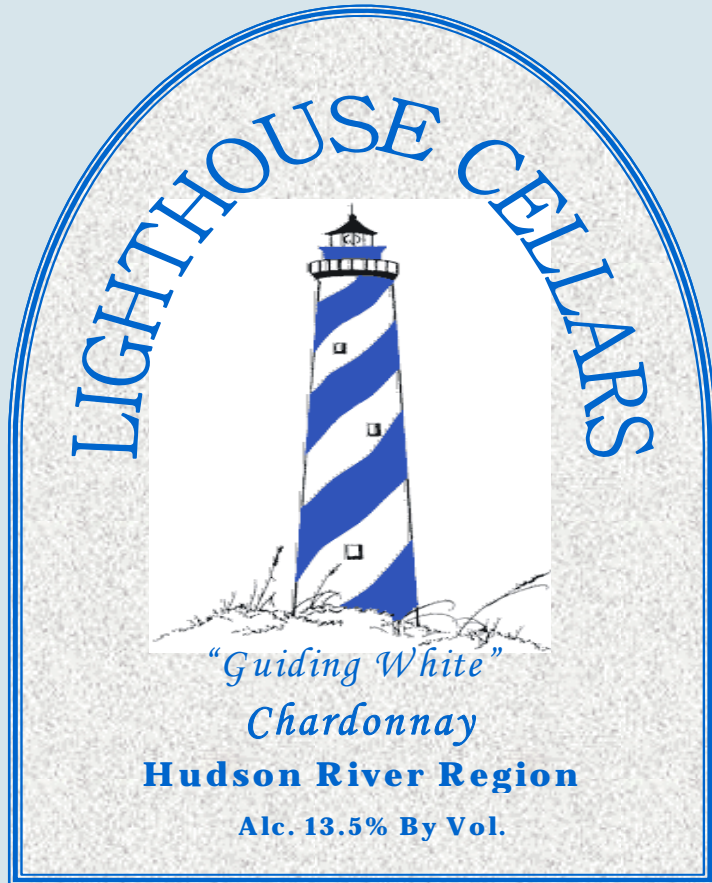
# NET CONTENTS

- Metric standards of fill; authorized sizes per 27 CFR 4.72
  - May be on label or etched/blown into the container (which would be stated under “Special wording”)
  - “ml” on containers of less than 1 liter and “L” on container of one liter or more
- ▶ May appear on any label

27 CFR 4.37, 4.72

# NET CONTENTS

## Front Label



## Back Label



**Produced And  
Bottled By  
Lighthouse Cellars  
Kingston, NY**

**Contains Sulfites 750mL**

**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.

# SULFITE DECLARATION



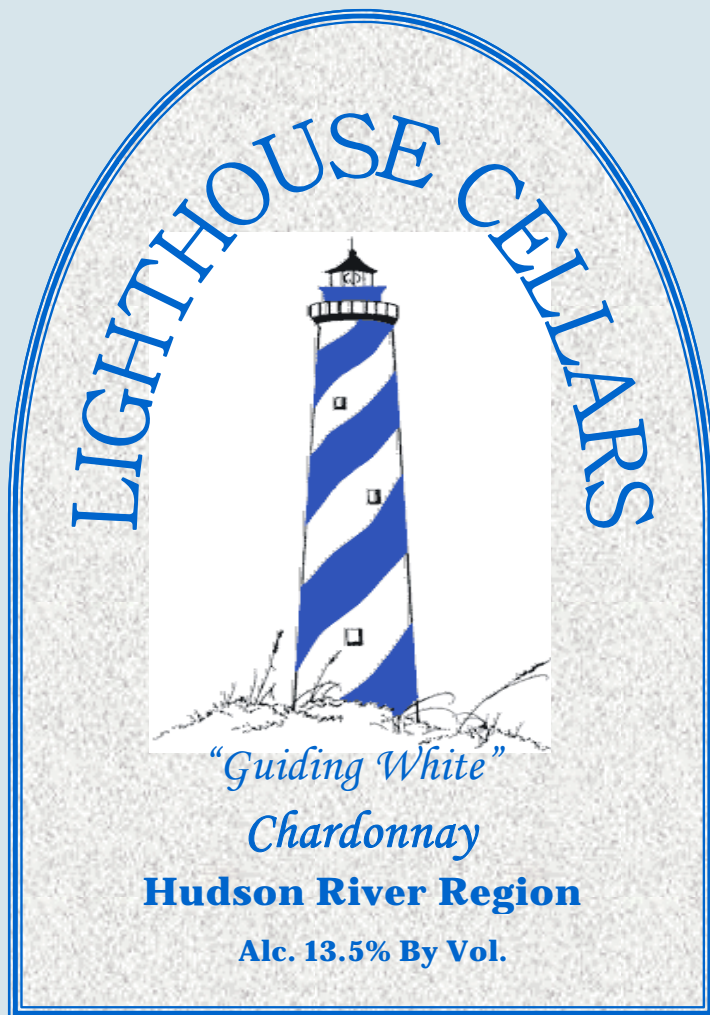
- ▶ Must declare if 10 ppm or more
- ▶ “Contains Sulfites”
- ▶ Statement may appear on any label
- ▶ If less than 10 ppm, may be omitted:
  - Obtain Lab Analysis
  - Submit analysis with COLA



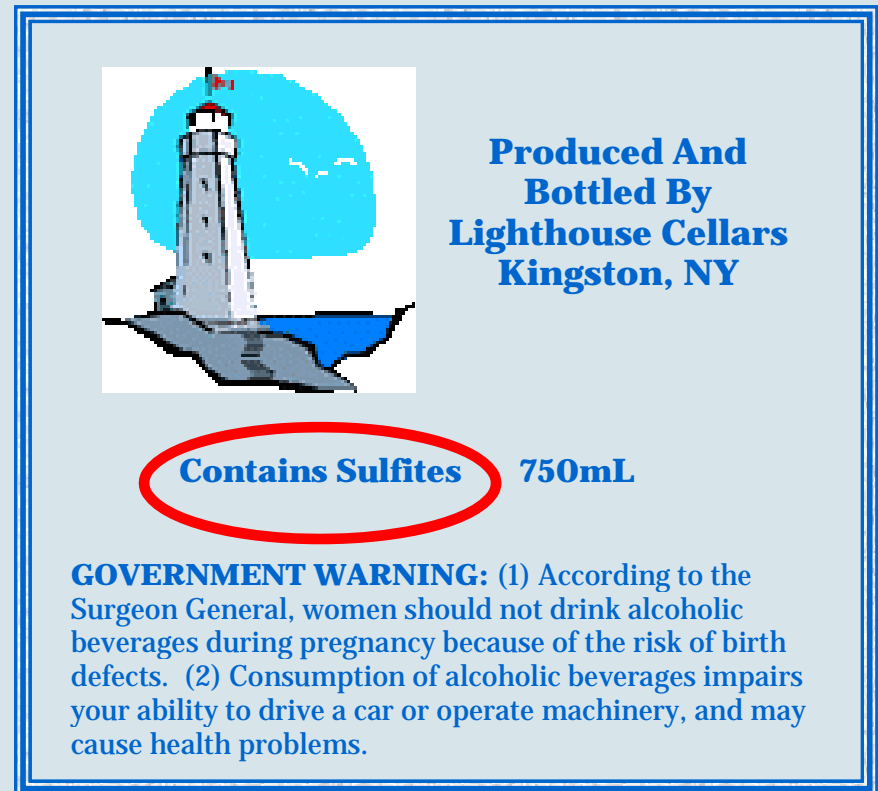
27 CFR 4.32(e)

# SULFITE DECLARATION

## Front Label



## Back Label



# HEALTH WARNING STATEMENT

**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.

**May appear on any label**

27 CFR part 16

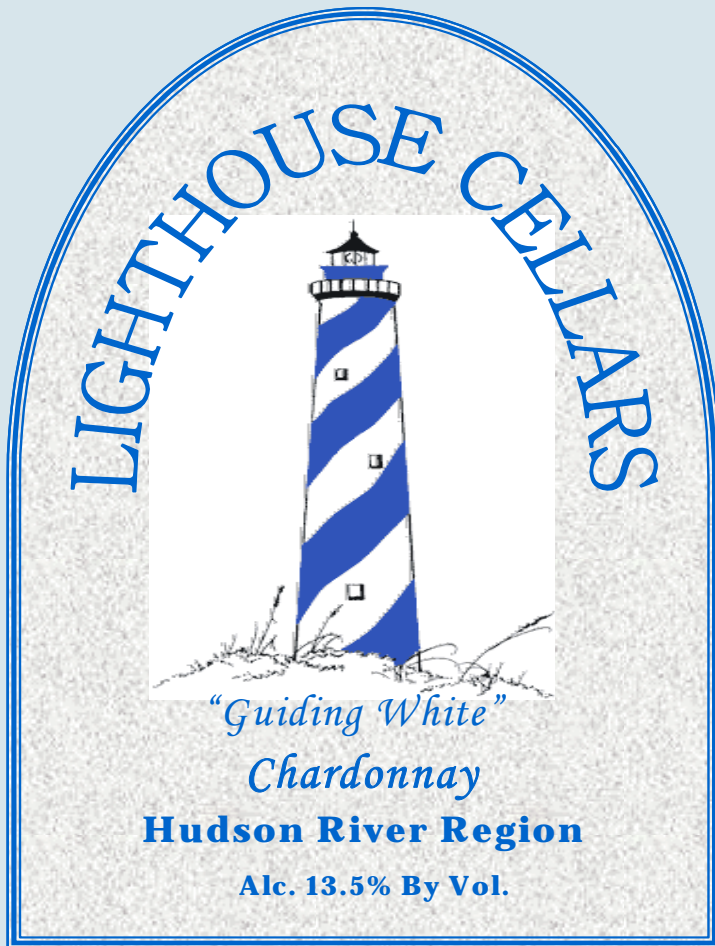
# HEALTH WARNING STATEMENT

- The words **“GOVERNMENT WARNING”** must be in capital letters and bold type
- The **“S”** in Surgeon and **“G”** in General must be capitalized
- Appear as one statement
- Legible on contrasting background
- Separate and Apart

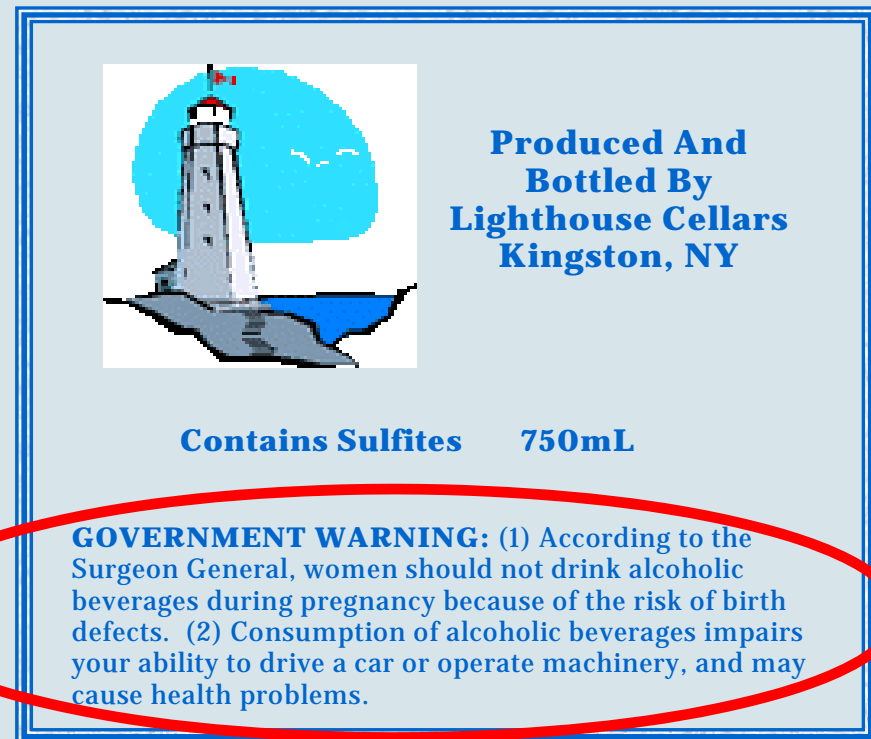
27 CFR part 16

# HEALTH WARNING STATEMENT

## Front Label

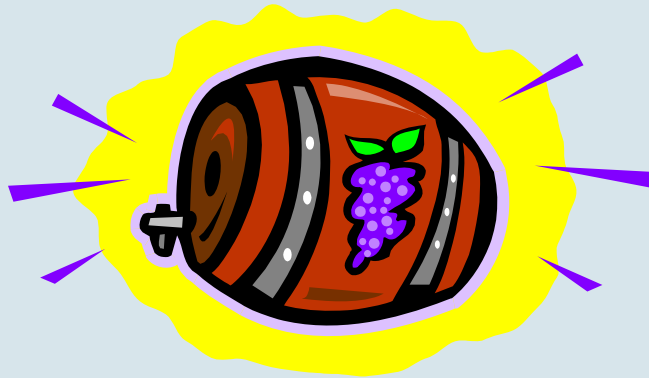


## Back Label



# ALLOWABLE REVISIONS

When do I NOT need to get new approval?



Allowable Revisions- <https://ttb.gov/allowable-revisions/label-generator.shtml>



# INCLUDES BUT NOT LIMITED TO (UNDER SPECIFIED CONDITIONS):

- Deleting non-mandatory information
- Repositioning
- Change color/font
- Percentage of blend
- Vintage date
- Change name or Trade Name to reflect a name that is listed on your permit.
- Change “Produced” to “Vinted” or “Cellared”
- Net Contents
- Alcohol Content
- Age Statement

YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
1. Delete any non-mandatory label information, including text, illustrations, graphics, etc.	YES	YES	YES	

### Approved COLA



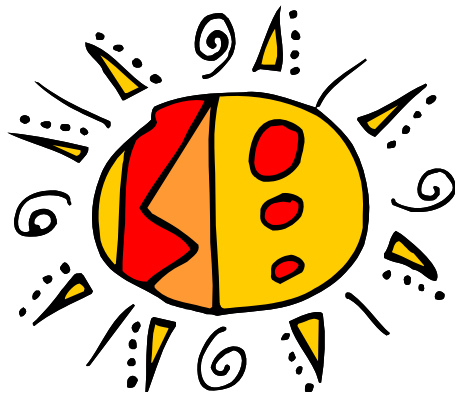
### Allowable revision



YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
2. Reposition any label information, including text, illustrations, graphics, etc.	YES	YES	YES	The repositioning must comply with any placement requirements applicable to mandatory information. For example, some types of mandatory information must appear on the brand label or must appear together with other label information.

**Approved COLA**

**SUNNYSIDE ACRES**

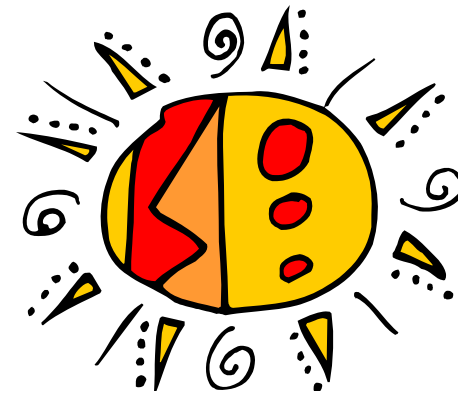


Finger Lakes

New York

**WHITE WINE**

**Allowable revision**



**SUNNYSIDE ACRES**

**WHITE WINE**

New York

Finger Lakes

YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
10. Change the net contents statement.	YES	YES	YES	Revisions must comply with all applicable regulations governing net content statements and standards of fill. Please ensure that all applicable type size requirements are met for each container size.

### Approved COLA

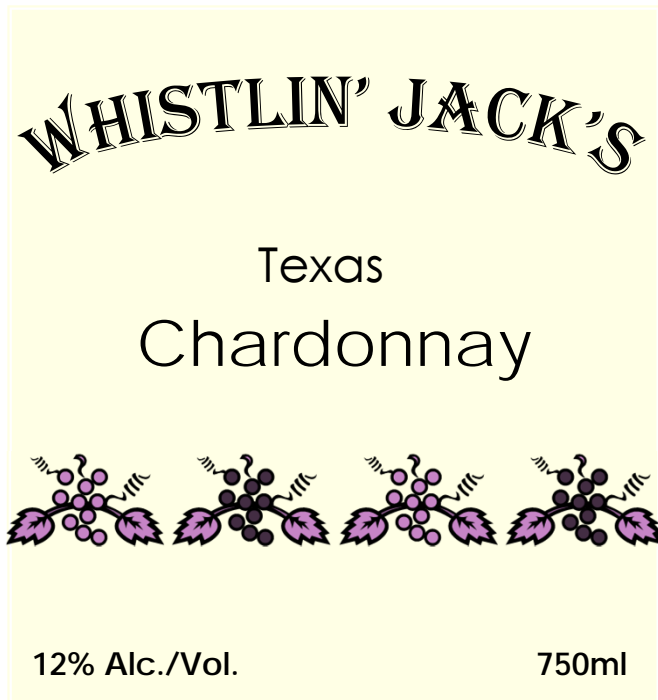


### Allowable revision

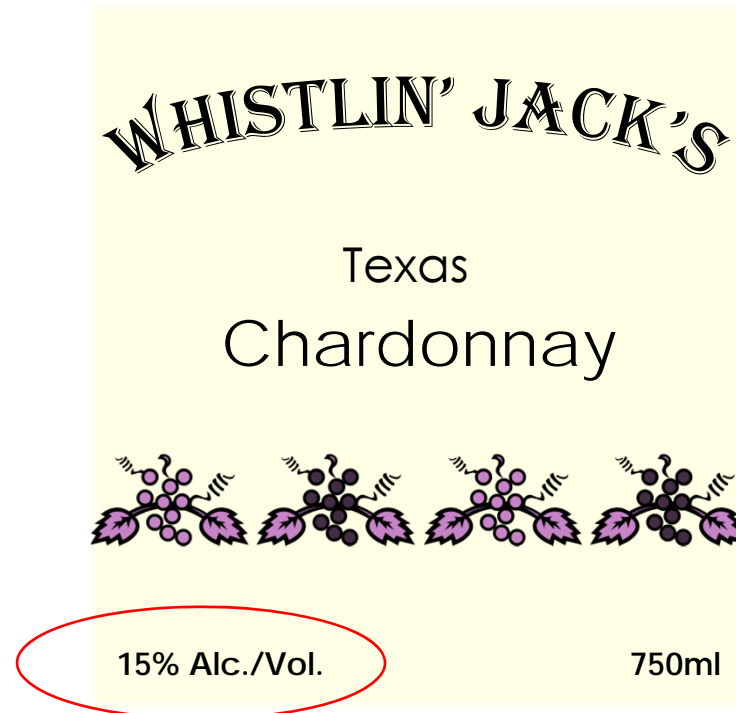


YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
11. Change the mandatory statement of alcohol content, as long as the change is consistent with the labeled class and type designation, and all other labeling statements.	YES	YES	YES (Flavored Malt Beverages Only)	For example, you may change the alcohol content of a grape wine labeled with a varietal designation from 13 percent to 15 percent alcohol by volume, even though it results in a change to the product's tax classification. However, if the product was designated and labeled as a "table wine," an alcohol content of 15 percent alcohol by volume would be inconsistent with the rules for use of that designation, so this change would not be permitted.  Similarly, a label bearing a "rum" designation may not be changed to state an alcohol content of less than 40 percent alcohol by volume. The revised alcohol content statement must be consistent with all other mandatory or optional labeling statements.

### Approved COLA



### Allowable revision



# TOP REASONS FOR CORRECTION

- **Class/Type Designation is missing**
- **Name or Trade Name are incorrect**
- **Clarification Needed**
- **Application Omissions**
- **Application not submitted by the bottler**
- **Wrong Label uploaded as the Brand label**
- **General Misleading**
- **Appellation Conflict**
- **Class/Type info in Brand, Fanciful Name or Appellation field**
- **Appellation is missing**

\*Highlighted in **Yellow** are application errors

# Questions