



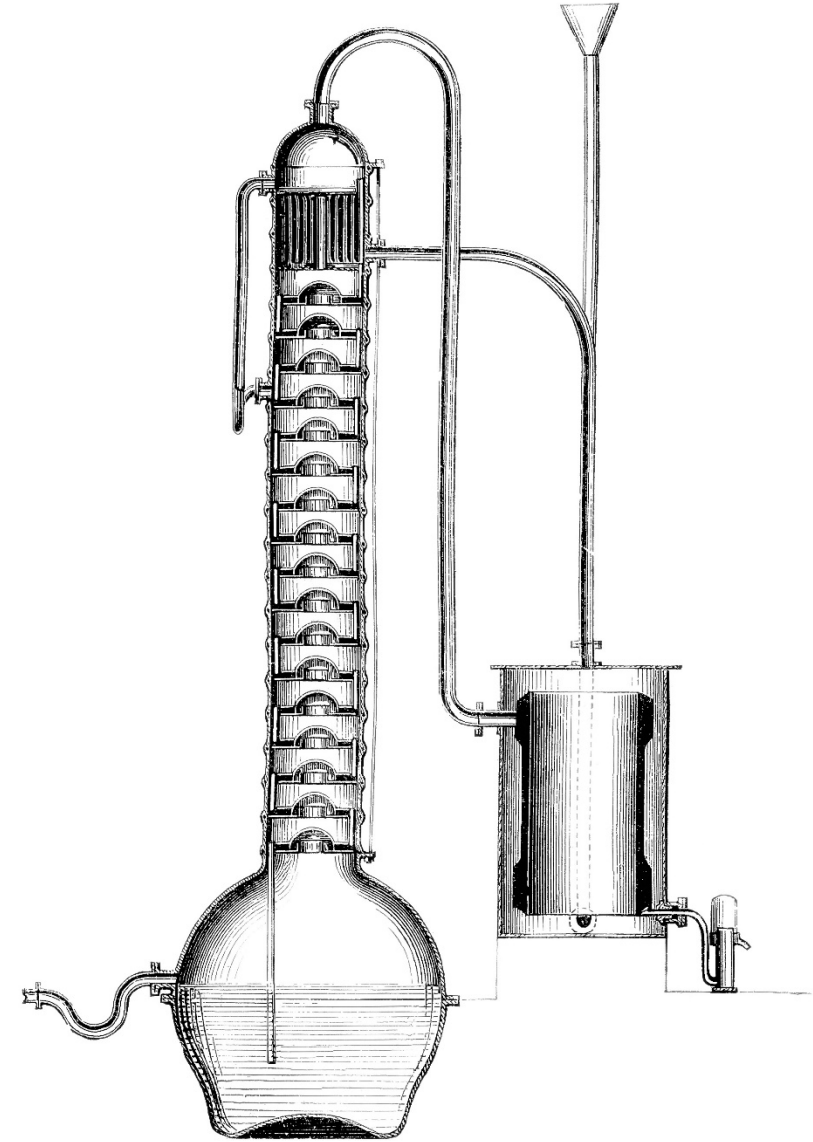
TTB Bootcamp for Distillers

2021 ADI Craft Spirits Conference

Introduction to TTB

Janelle Christian

Industry Outreach Program Manager





TTB Disclaimer

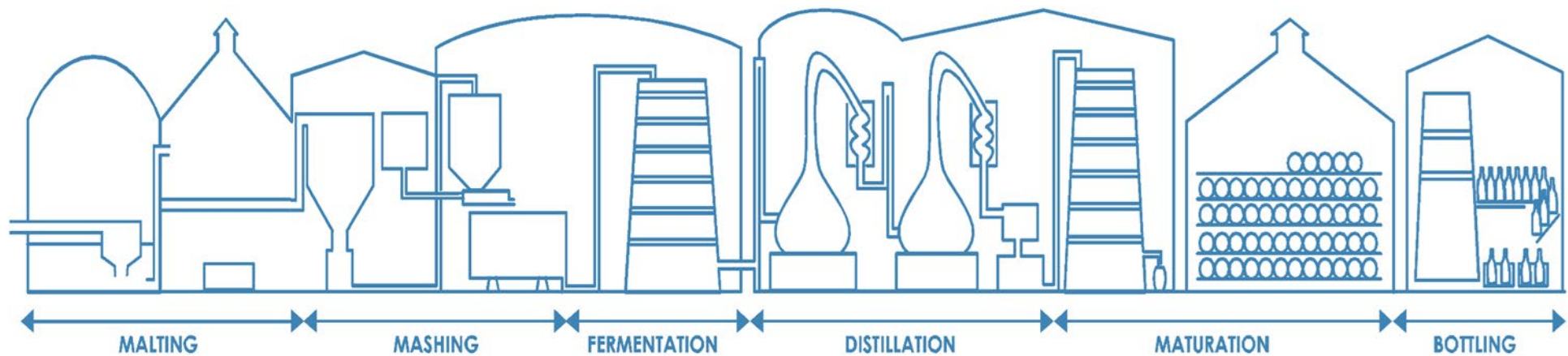
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Please consult the applicable laws and regulations for the most current requirements.

TTB Overview





TTB Overview

- We are a bureau within the Department of the Treasury
- We currently have about 480 employees
- Our headquarters are in Washington, DC
- The National Revenue Center is in Cincinnati, Ohio
- We have field offices located across the country
- We have 4 laboratories, located in Maryland and California

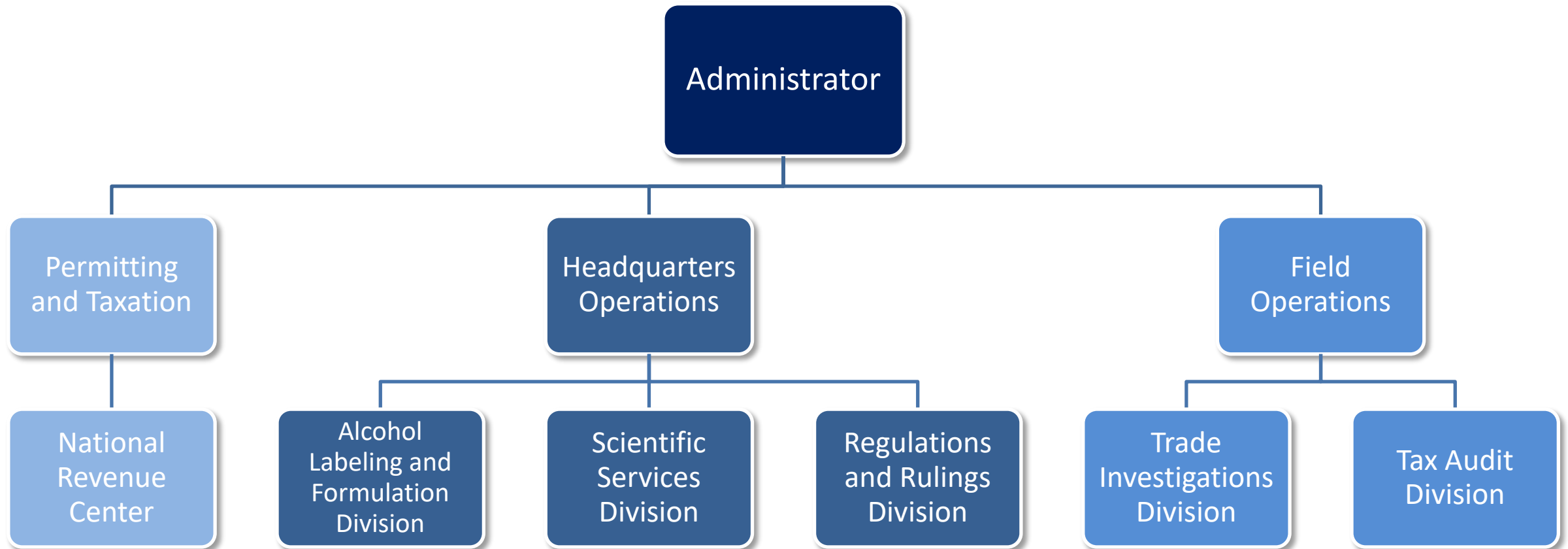


TTB Mission

- **COLLECT** the taxes on alcohol, tobacco, firearms, and ammunition;
- **PROTECT** the consumer by ensuring the integrity of alcohol products;
- **ENSURE** only qualified businesses enter the alcohol and tobacco industries; and
- **PREVENT** unfair and unlawful market activity for alcohol and tobacco products.

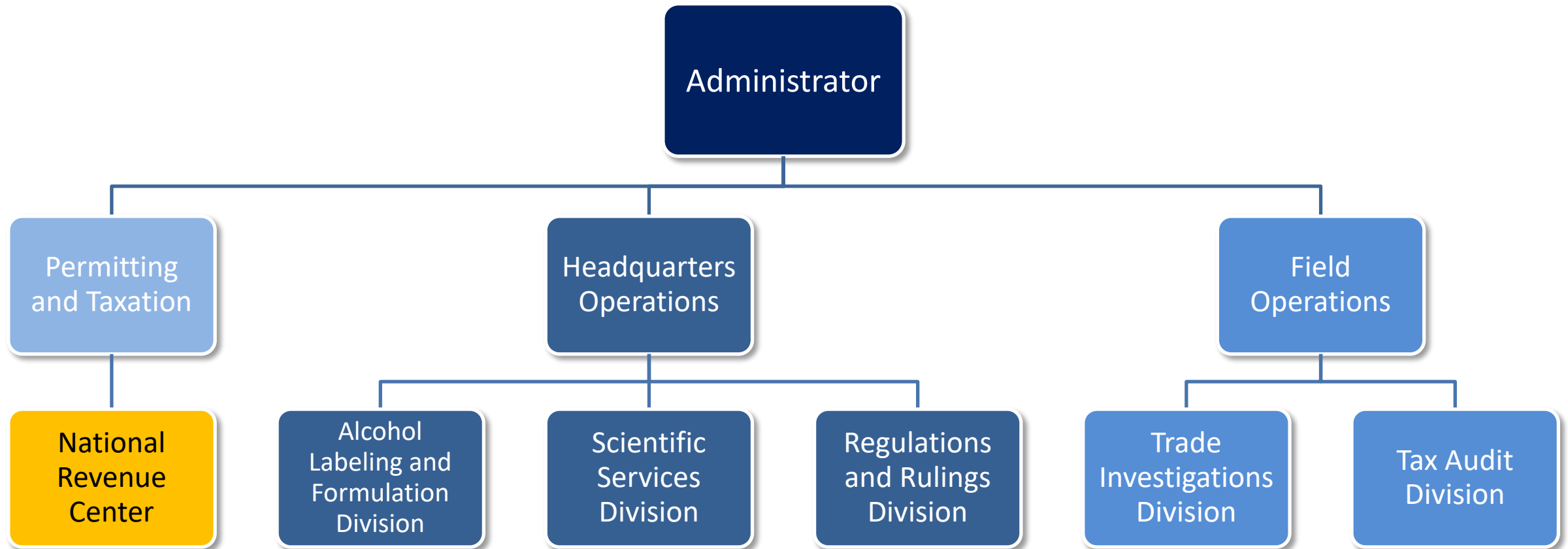


TTB Organizational Chart





TTB Organizational Chart



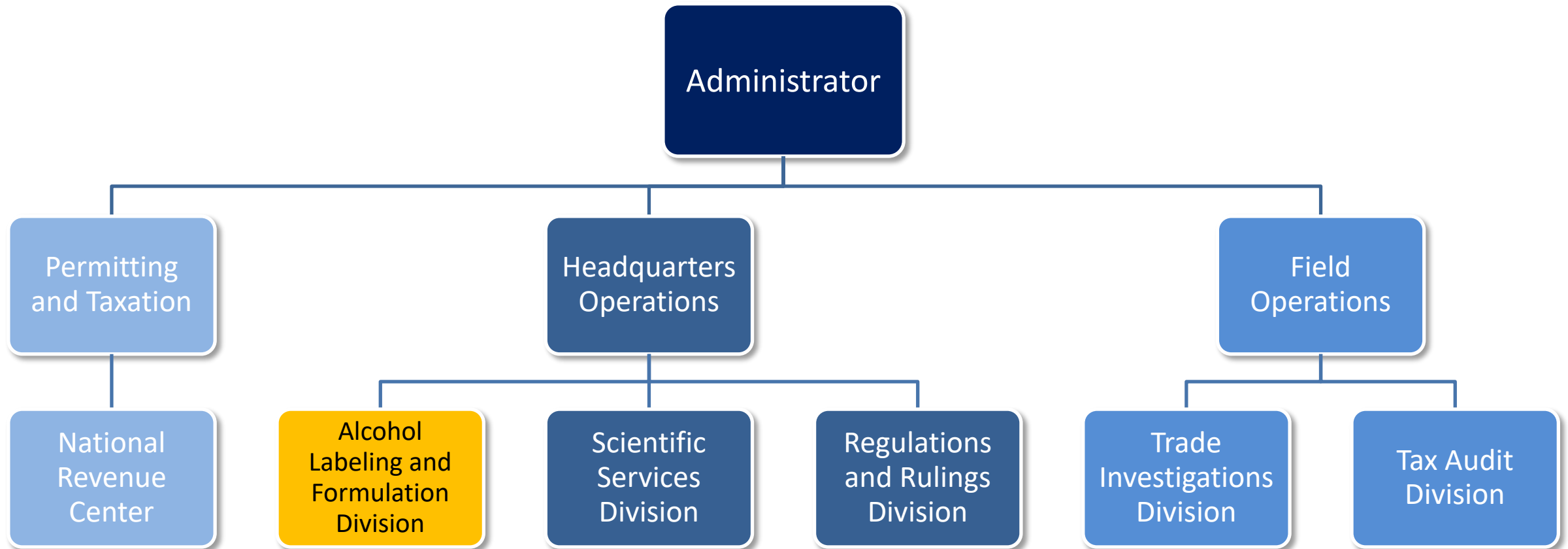


National Revenue Center

- Issues **permits/notices/registrations**
- Processes **tax returns, operational reports, and claims**
- Located in Cincinnati, Ohio
- Toll-Free: 877-882-3277
- Web Form: [Submit Online Inquiry](#)



TTB Organizational Chart

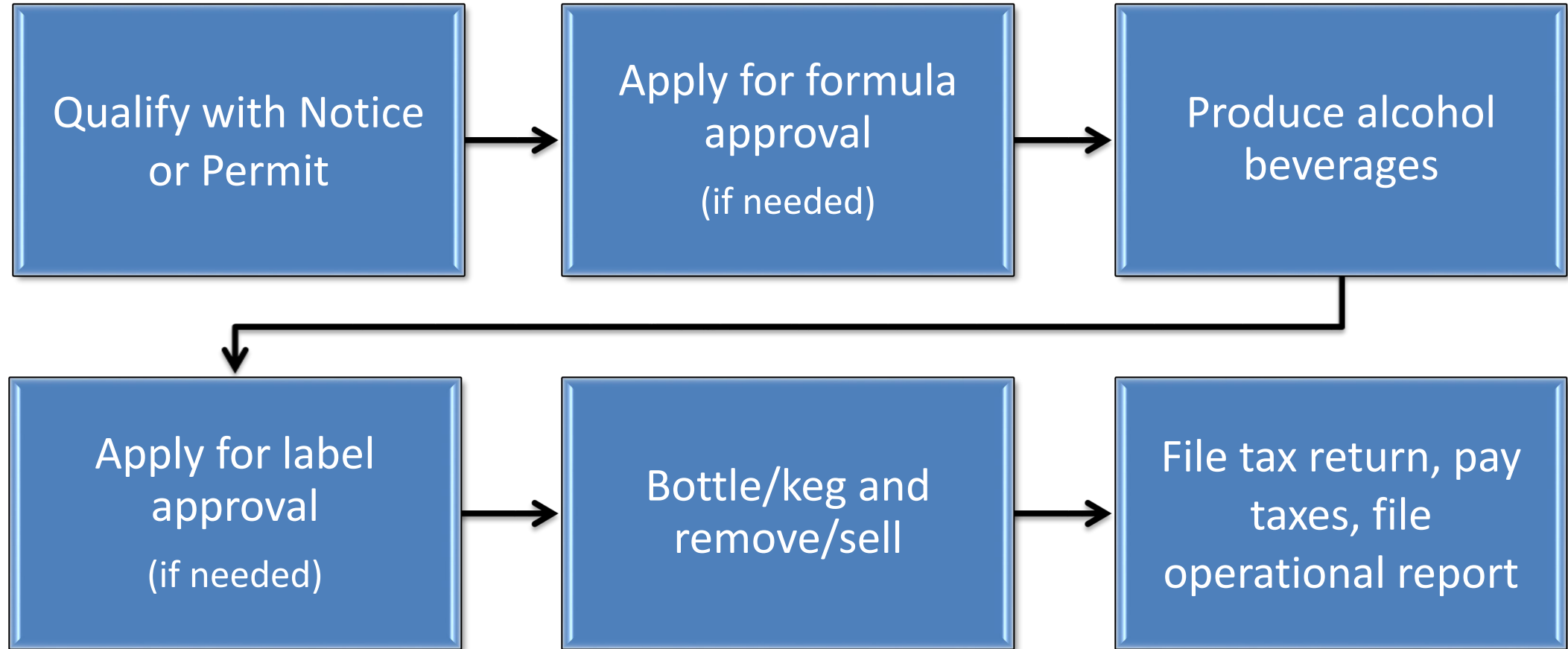




Alcohol Labeling and Formulation Division

- Processes applications for **formula** approval
- Processes applications for **label** approval
- Located in Washington, DC
- Toll-Free: 866-927-2533
- Web Form: [Submit Online Inquiry](#)

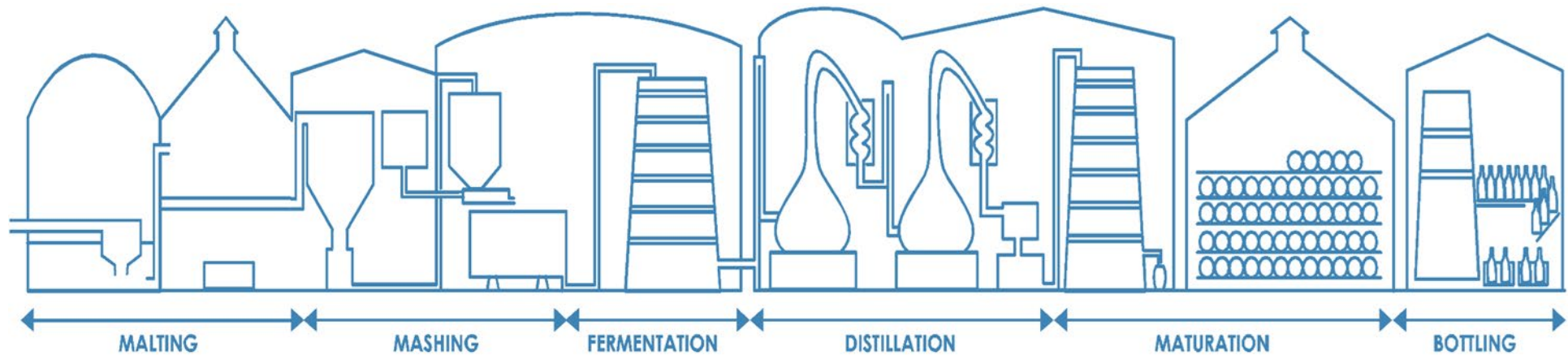
Follow the TTB Path



Ongoing once your Brewer's Notice, Distilled Spirits Plant Permit, or Winery Permit is approved:

1) Keep records of operations 2) report changes to your business to TTB

TTB Laws and Regulations





TTB Laws and Regulations*

Domestic Producers

- Internal Revenue Code (IRC)
 - [Part 19](#) Distilled Spirits Plants
 - [Part 24](#) Wine
 - [Part 25](#) Beer
- Federal Alcohol Administration Act (FAA Act)
 - [Part 4](#) Labeling and Advertising of Wine
 - [Part 5](#) Labeling and Advertising of Distilled Spirits
 - [Part 7](#) Labeling and Advertising of Malt Beverages

* Not a complete list



IRC Requirements for (Domestic) Alcohol Beverage Products

- Applies to all alcohol beverage products produced in the U.S.
- Includes:
 - Qualification
 - Recordkeeping requirements and reports
 - Taxes
 - Formulas (for some alcohol beverage products)
 - Minimum marks, brands and label requirements

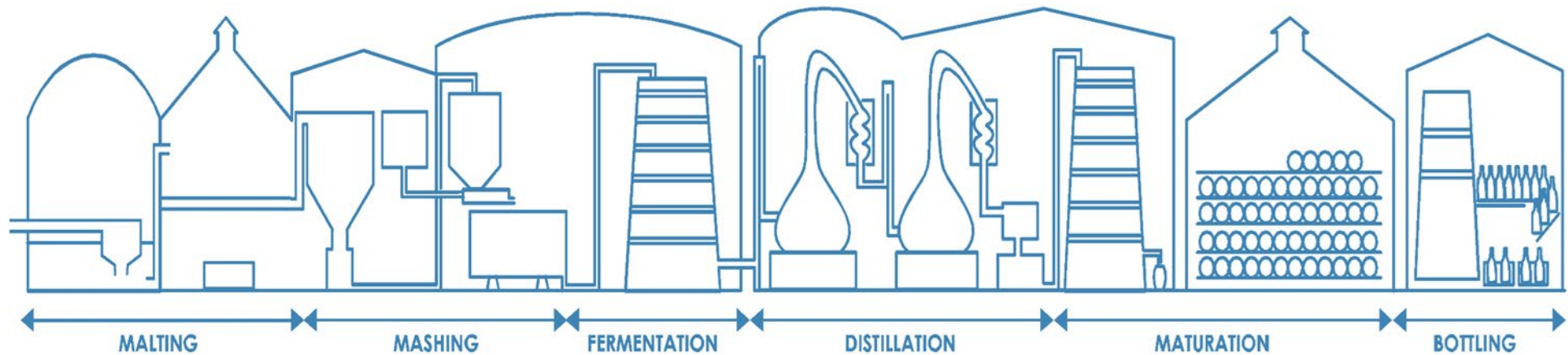


FAA Act Requirements

- Applies to domestic and imported alcohol beverage products, but only if they are sold or shipped ... in interstate commerce*
- Includes:
 - Labeling requirements
 - Certificates of Label Approval (COLA)
 - Advertising
 - Trade practices

*Other conditions may apply for labeling and COLA requirements

Qualification: Permits





Business Entity and Commodity Operations

- Your information in Permits Online is organized in two different kinds of records
 - The **entity record** equates to a single company or business entity, represented by a unique Employer Identification Number (EIN)
 - A **commodity operations record** is created for each TTB-regulated operation or permit, registration, or notice the entity is approved for
- A typical entity record will have at least one, but may have multiple commodity operations records associated with it



Business Entity and Commodity Operations





Business Entity and Commodity Operations

- When applying to start a new TTB-regulated business, you'll complete **both a new entity application and a new commodity operations application** for each permit, registration, or notice you need
- If you need to file an amendment related to the business entity, you will file one application and the changes are associated with each TTB permit, registration, or notice held by that company



Changes to Your Entity that You Must Report to TTB

- Changes in:
 - the legal business name
 - controlling ownership
 - any partner or general partner
 - any stockholder or members holding ownership of 10 percent or more
 - corporate officer, directors, or any titled positions
- Adding, revoking, or changing:
 - signing authority
 - power of attorney
- Termination of all TTB-regulated operations under your EIN (going completely out of business)



Changes to Your Commodity Operations That You Must Report*

- Change in:
 - premises location
 - bond
 - construction or use of building
 - operations
 - DBA/Operating name
 - mailing address
- Adding or removing:
 - trade names
 - noncontiguous premises
 - alternation of premises
 - alternation of proprietor
 - variance or alternate method
- Termination of operations at one location, but keeping other operations/locations under the same EIN open

*requirements vary slightly by commodity



Resources

Resources

Apply for a Permit: Qualifying with TTB

<https://www.ttb.gov/business-tools/qualify-with-ttb>

Permits Online Customer Page

<https://www.ttb.gov/ponl/customer-support>

Permits Online Tutorial

<https://www.ttb.gov/ponl/ponl-launch>

State Alcohol Beverage Authorities

<https://www.ttb.gov/wine/alcohol-beverage-control-boards>

Alcohol FAQs

<https://www.ttb.gov/faqs/alcohol>

Maintaining Compliance in a TTB-Regulated Industry

<https://www.ttb.gov/business-central/industry-members-responsibilities>

Overview of the Application Process

<https://www.ttb.gov/ponl-help/permits-online-overview-of-the-application-process>

Laws, Regulations, and Public Guidance

<https://www.ttb.gov/laws-regulations-and-public-guidance>



Contact Us

Questions?

Contact the National Revenue Center at:

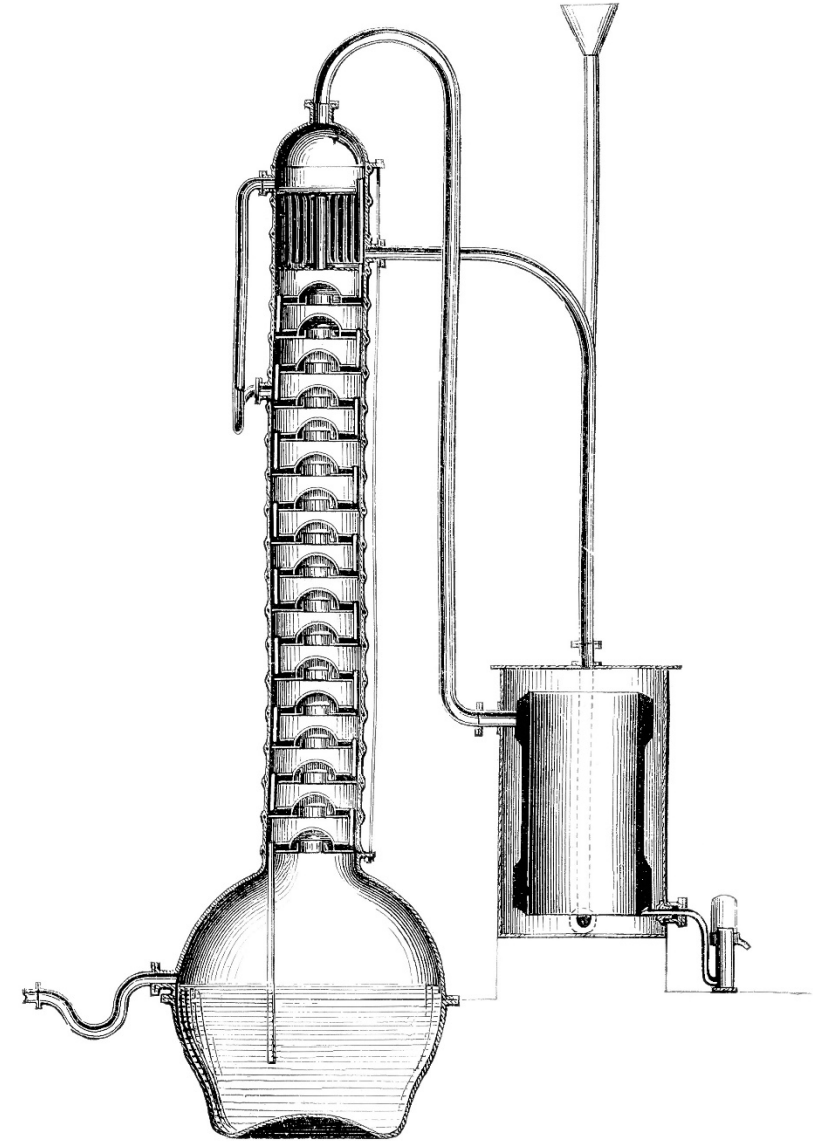
- Toll-Free: 877-882-3277 / 877-TTB-FAQS
- Use our [National Revenue Center Contact Form](#)

Representatives are Available:

8 a.m. to 4:30 p.m. ET Monday - Friday (except on federal holidays)

Formulas

Vonzella C. Johnson
Formula Specialist
Alcohol Labeling and Formulation Division





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Common Formula Questions

- What is a formula?
- Why is a formula required?
- What types of distilled spirits require formula review?
- How is a formula submitted?



What is a Formula - A Basic Definition

- A formula is a recipe
- It must indicate a total yield, or batch size
- It must have a quantitative list of ingredients
- It must include a description of how the product is produced



Why is a Formula Required?

- It's required per TTB regulations. (27 CFR 5.27)
- **Generally, an approved formula is required to:**
 - Blend
 - Mix
 - Purify
 - Refine
 - Compound
 - Or treat spirits in a manner which results in a change of:
 - Character
 - Composition
 - Class or type of the spirits



Why is a Formula Required?

- [27 CFR 5.22](#) contains the 12 Standards of Identity
 - Some classes are straightforward, for example, Rum, while other products have more working parts that require label disclosure
 - A product may have a particular requirement to satisfy in order to belong to a given class
- Formula review finds a “home” for a product and describes its working parts
- A class, type, or statement of composition represents the outcome of this process
 - Additional information may be added for labeling reasons
- Not all products will require a formula



When is a Formula Required?

- The use (except as authorized for production or storage operations as provided by 27 CFR part 19) of any physical or chemical process or any apparatus which accelerates the maturing of the spirits
- The steeping or soaking of fruits, berries, aromatic herbs, roots, seeds, etc., in spirits.
- The artificial carbonation of spirits
- The blending in Puerto Rico of spirits with any liquors manufactured outside of Puerto Rico
- (See 27 CFR 5.27 for additional processes that require formula approval)

[Which Alcohol Beverages Require Formula Approval Tool](#)



Are Formulas Required for all Products?

- **Not** all products require formula review
- Time saving resources:
 - [Which Alcohol Beverages Require Formula Approval Tool](#)
 - [TTB G 2016-3 - Pre-COLA Product Evaluations for Distilled Spirits Products](#)
 - [TTB G 2017-5 - Alcohol Beverage Formula Approval with Lab Sample Analysis](#)
 - [TTB Ruling 2016-3 - TTB Approves General-Use Formulas for Certain Distilled Spirits Produced Using Harmless Coloring, Flavoring, or Blending Materials](#)



How to Submit a Formula

- **Formulas Online** is part of the TTB electronic storefront on www.ttbonline.gov
- You must register for an account before you can use Formulas Online:



What TTB Looks For

- Class and Type – Is the base produced according to the stated standard for the specified class and type?
- Flavors and Flavor Ingredient Data (FID) sheets
- Food safe ingredients under FDA regulations (including Generally Recognized As Safe or GRAS ingredients)
- Restricted and prohibited ingredients
- Colors



Compounded Flavors

- Types:
 - All natural
 - Natural and artificial containing less than or equal to 0.1% artificial content topnote
 - Natural and artificial containing greater than 0.1% artificial content topnote
 - All artificial
 - Non-flavor: product is not a flavor (e.g., Cloud Emulsion)
- Submitted to TTB Nonbeverage Lab for Review
- May contain coloring materials



Flavor Ingredient Data Sheet (FID Sheet or FIDS)

- A FID Sheet is a document that includes information about certain ingredients used to make a compounded flavor
- Submit one for each compounded flavor used in your product
- The FID Sheet allows TTB to:
 - Ensure that the compounded flavor has been evaluated by the TTB Nonbeverage Products Laboratory (NPL)
 - Verify that your beverage does not contain any ingredients in excess of the limits prescribed by TTB or by FDA
 - Ensure the appropriate labeling of your product.
 - Ensure your product complies with TTB restrictions governing how much of the alcohol in your beverage may be derived from flavors and other nonbeverage ingredients containing alcohol.
- See [TTB G 2017-4](#) for additional information and examples.



Flavor Ingredient Data Sheet (FID Sheet or FIDS)

- Flavor manufacturer supplies form to the Producer.
- FID based on exchange between flavor producer and TTB Nonbeverage Laboratory
- It lists concentration of limited ingredients in PPM
- Lists any colors used in flavor
- States alcohol content of flavor
- This information, combined with the use rate determines classification of flavor

Flavor Ingredient Data Sheet				
Flavor Producer Information				
TTB Co. Code: <u>FLRUS</u>		Date: <u>1/1/2017</u>		
Company Name: <u>Flavors-R-Us LLC</u>		Contact Person: <u>Jane Q. Flavor</u>		
Address: <u>123 Nonexistent Street</u>		Phone: <u>202-555-5555</u>		
<u>Any City, State USA 00000</u>		Fax: <u>202-555-5554</u>		
Check Appropriate Box:				
Flavor Name: <u>Natural Poppin' Pecan Supreme</u>		Approved for Drawback (DrB) <input type="checkbox"/>		
TTB Drawback Number: <u>123456</u>		Approved as No Action (N/A) <input checked="" type="checkbox"/>		
Alcohol Range by Volume: <u>50.0 - 54.0</u>		Fit for Beverage Purposes (Fit) <input type="checkbox"/>		
Flavor Product Number: <u>7891011</u>		Submitted for TTB Approval <input type="checkbox"/>		
		Not Yet Submitted for TTB Approval <input type="checkbox"/>		
Classification				
Natural <input checked="" type="checkbox"/>	N&A ≤ 0.1% Topnote <input type="checkbox"/>	N&A > 0.1% Topnote <input type="checkbox"/>	Artificial <input type="checkbox"/>	Non-Flavor <input type="checkbox"/>
Total Artificial Flavor Content: _____ ppm (Excluding Synthetic Vanillin, Ethyl Vanillin, Synthetic Maltol, and Ethyl Maltol)				
Flavor Components				
TTB/FDA Limited Ingredients	TTB/FDA Limitation in Finished Product	Amount of Additive or Agent Present in Flavor	Maximum Use Rate	Coloring Additives and Other Additives that Affect the Beverage Label (check or list label ingredients that affect the beverage label)
1. Synthetic Vanillin	40.0 ppm	_____ ppm	- %	1. FD&C Yellow #5 <input type="checkbox"/>
2. Ethyl Vanillin	16.0 ppm	_____ ppm	- %	2. FD&C Yellow #6 <input type="checkbox"/>
3. Synthetic Maltol	250.0 ppm	_____ ppm	- %	3. FD&C Blue #1 <input type="checkbox"/>
4. Ethyl Maltol	100.0 ppm	_____ ppm	- %	4. FD&C Blue #2 <input type="checkbox"/>
5. Ester Gum	100.0 ppm	_____ ppm	- %	5. FD&C Green #3 <input type="checkbox"/>
6. BVO	15.0 ppm	_____ ppm	- %	6. FD&C Red #40 <input type="checkbox"/>
7. Sodium Benzoate	1,000.0 ppm	5,000 ppm	20.00 %	7. Grapeskin Extract <input type="checkbox"/>
8. Gum Arabic/Acacia	200,000.0 ppm	_____ ppm	- %	8. Caramel Color <input checked="" type="checkbox"/>
9. Propylene Glycol	50,000.0 ppm	10,000 ppm	NO LIMIT %	9. Annatto <input type="checkbox"/>
10. BHA	(<0.5% Essential Oil)	<input type="checkbox"/> check if contained	- %	10. Elderberry Extract <input type="checkbox"/>
11. Acetic Acid	1,500.0 ppm	_____ ppm	- %	11. Beet Extract <input type="checkbox"/>
12. _____	_____ ppm	_____ ppm	- %	12. Oak Extract <input type="checkbox"/>
13. _____	_____ ppm	_____ ppm	- %	13. Carmine/ <input type="checkbox"/>
14. _____	_____ ppm	_____ ppm	- %	Cochineal Extract <input type="checkbox"/>
15. Total Vanillin	40.0 ppm	- ppm	- %	14. _____ <input type="checkbox"/>
16. Total Maltol	250.0 ppm	- ppm	- %	15. _____ <input type="checkbox"/>
Confidential Limited Ingredients Not Shown (CLI)				
Check if contained in formula <input type="checkbox"/> Check if CLI was previously submitted <input type="checkbox"/>				
Beverage Manufacturer / Importer: _____				
Formula # / Serial #: _____				
_____ Title: <u>Supervisory Chemist</u> Date: <u>30-Sep-17</u>				
Flavor Company Representative Signature				



FID Header

Flavor Ingredient Data Sheet

Flavor Producer Information

TTB Co. Code: FLRUS
Company Name: Flavors-R-Us LLC
Address: 123 Nonexistant Street
Any City, State USA 00000

Date: 1/1/2017
Contact Person: Jane Q. Flavor
Phone: 202-555-5555
Fax: 202-555-5554

Flavor Name: Natural Poppin' Pecan Supreme
TTB Drawback Number: 123456
Alcohol Range by Volume: 50.0 - 54.0
Flavor Product Number: 7891011

Check Appropriate Box:

Approved for Drawback (DrB) ☐
Approved as No Action (N/A) ☒
Fit for Beverage Purposes (Fit) ☐
Submitted for TTB Approval ☐
Not Yet Submitted for TTB Approval ☐

Classification

Natural ☒ N&A \leq 0.1% Topnote ☐ N&A $>$ 0.1% Topnote ☐ Artificial ☐ Non-Flavor ☐

Total Artificial Flavor Content: _____ ppm (Excluding Synthetic Vanillin, Ethyl Vanillin, Synthetic Maltol, and Ethyl Maltol)



Limited Ingredients Section

Flavor Components				Coloring Additives and Other Additives that Affect the Beverage Label
TTB/FDA Limited Ingredients	TTB/FDA Limitation in Finished Product	Amount of Additive or Agent Present in Flavor	Maximum Use Rate	(check or list label ingredients that affect the beverage label)
1. Synthetic Vanillin	40.0 ppm	_____ ppm	- %	1. FD&C Yellow #5 <input type="checkbox"/>
2. Ethyl Vanillin	16.0 ppm	_____ ppm	- %	2. FD&C Yellow #6 <input type="checkbox"/>
3. Synthetic Maltol	250.0 ppm	_____ ppm	- %	3. FD&C Blue #1 <input type="checkbox"/>
4. Ethyl Maltol	100.0 ppm	_____ ppm	- %	4. FD&C Blue #2 <input type="checkbox"/>
5. Ester Gum	100.0 ppm	_____ ppm	- %	5. FD&C Green #3 <input type="checkbox"/>
6. BVO	15.0 ppm	_____ ppm	- %	6. FD&C Red #40 <input type="checkbox"/>
7. Sodium Benzoate	1,000.0 ppm	5,000 ppm	20.00 %	7. Grapeskin Extract <input type="checkbox"/>
8. Gum Arabic/Acacia	200,000.0 ppm	_____ ppm	- %	8. Caramel Color <input checked="" type="checkbox"/>
9. Propylene Glycol	50,000.0 ppm	10,000 ppm	NO LIMIT %	9. Annatto <input type="checkbox"/>
10. BHA	(<0.5% Essential Oil)	<input type="checkbox"/> check if contained		10. Elderberry Extract <input type="checkbox"/>
11. Acetic Acid	1,500.0 ppm	_____ ppm	- %	11. Beet Extract <input type="checkbox"/>
12. _____	_____ ppm	_____ ppm	- %	12. Oak Extract <input type="checkbox"/>
13. _____	_____ ppm	_____ ppm	- %	13. Carmine/ Cochineal Extract <input type="checkbox"/>
14. _____	_____ ppm	_____ ppm	- %	14. _____ <input type="checkbox"/>
15. Total Vanillin	40.0 ppm	- ppm	- %	15. _____ <input type="checkbox"/>
16. Total Maltol	250.0 ppm	- ppm	- %	



TTB Limited Ingredients

- There are four artificial flavoring materials that are TTB limited ingredients:
 - Synthetic maltol
 - Ethyl maltol
 - Synthetic vanillin
 - Ethyl vanillin
- If the limits for these ingredients are exceeded, a “natural flavor” is treated as an “artificial flavor” in the product



Ingredient Specification Sheet (Spec Sheet or Technical Data Sheet)

- A spec sheet is a document or label that lists or describes the contents of an ingredient that is made from more than one component
- Submit a spec sheet for each ingredient that is made from more than one component, e.g., a fruit juice made from water, apples, and sugar
- Should not be used for compounded flavors (use FID sheet)
- See [TTB G 2017-3](#) for additional information and examples



FDA Requirements

- FDA has authority over food and ingredient safety
 - Approved Food Additives
 - 21 CFR parts 170-186
 - Generally Recognized as Safe
 - Traditional use in food prior to 1958
 - Scientific determination
- Traditional medicines/dietary supplements are not necessarily GRAS
- Importer/producer is responsible for proving that an ingredient is GRAS or otherwise approved for use in alcohol beverages.





Helpful Hints

- Supply a quantitative list of ingredients.
- Provide a complete method of manufacture.
- Indicate at what stage flavors are added to the product.
- Flavor Ingredient Data Sheets (FIDS) should include a TTB number, a Flavor Product Number, and the TTB Approval status (Nonbeverage Lab Approval).
- Provide the common name and scientific name (genus and species) for any unusual herbal ingredients.
- Ensure that ingredients are considered GRAS or otherwise approved by the FDA.



Formula Resources

- [Formula Approval guidance pages on TTB.gov](#)
- [Distilled Spirits Beverage Alcohol Manual \(BAM\)](#)
 - [BAM Chapter 1](#): Commodity Statements
 - [BAM Chapter 4](#): Quick product reference guide stating basic technical requirements
 - [BAM Chapter 7](#): Provides chart listing limitations placed on harmless coloring blending and flavoring materials (HCBFM)



Benefits of Using Formulas Online

- Secure method for drafting, submitting, and tracking your formula applications electronically
- Includes:
 - Step-by-step guidance
 - Data validation checks along the way
 - Application status updates via email
 - Facilitates record keeping
 - Approved formulas are stored online
 - Copies of approved formulas can be printed if needed



Example in Formulas Online

TTBONLINE.GOV
ALCOHOL AND TOBACCO TAX AND TRADE BUREAU
U.S. DEPARTMENT OF THE TREASURY



Formulas Online

[COLAS](#) [Home](#) [Text Menu](#) [My Profile](#) [Help](#) [Contact Us](#) [Log Off](#)

New View Company

Submissions

Beverage

Main Formula Samples Results Company Comments Docs/Links Workflow Needs Correction History

[Print](#) | [Comment](#) | [Upload](#) | [Close Historical](#)

☐ Expedite ☒ Paper Submission

Product Information

Class: IMITATION DISTILLED SPIRITS

Type:

Product Name: DS Example #1

[Change Product Information](#)

Definition

☐ [What does TTB look for?](#)

1 Measurement

* Type: ☒ Percentage ☐ Volume/Weight



2 Yield Summary

* Total Yield:



* Low

High

* Unit

* Alcohol Content of Finished Product: -



3 Ingredients List

List ALL ingredients to be used in formulating a batch of the product. Please enter the ingredients in production order.

[Ingredient List Examples](#)

▶ Vodka	98.0 - 99.0 Percentage AbV: 45% - 45% PaD: 191 - 195 Proof TTB Formula ID: <Not Entered>	Finished Alcohol	
▶ Artificial Rock-Lemon flavor	1.0 - 2.0 Percentage TTB Company Code: WL5 TTB Drawback #: 100	Flavor (Compounded)	
▶ Water	1.0 - 4.0 Percentage	Other	
▶ St. Johnathan's - The Sweetener with Heart	0.75 - 1.2 Percentage	Other	

[+Add Ingredient...](#)

[Which category should I choose?](#)

4 Method of Manufacture

Describe in sequence each step used to produce this product.

This can be done in a format similar to a recipe, for instance providing the sequence of steps in either a list or paragraph format to describe how your product is made.

See [Method of Manufacture Examples](#) for some indications of the level of detail that TTB looks for when evaluating formula submissions.

Description:

1.) Transfer finished Vodka to plant.
2.) Add Artificial Lemon Flavor and natural sweetener.
3.) Test alcohol level, adjust for added alcohol from flavors, add water to adjust bottling proof and bottle.

Method of Manufacture Documents

TYPE	NAME	DATE	ACTION
------	------	------	--------

[Add Attachment](#)

[« Previous](#)

[Save as Draft](#)

[Validate](#)

[Cancel](#)

[Next »](#)

We collect this information to verify your compliance with Federal laws and regulations that TTB administers. The information collected on this form must be considered confidential tax information under 26 U.S.C. 6103, and must not be disclosed to any unauthorized party under 26 U.S.C. 7213.

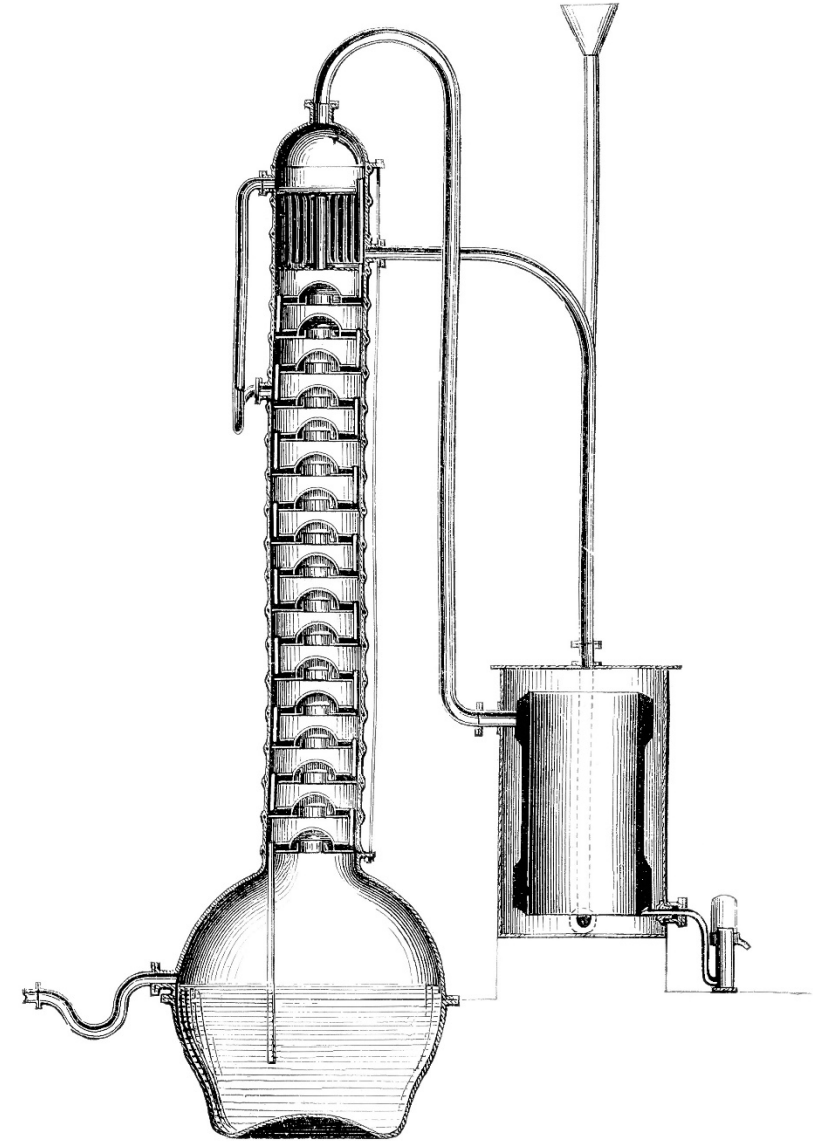


Common Reasons Formulas Must be Returned for Correction

- [Ingredient Specification Sheet \(Spec Sheet\)](#) is missing for ingredients composed of more than one component
- [Limited Ingredient Calculation Worksheet](#) is missing when compounded flavors are used
- [Flavor Ingredient Data \(FID\)](#) is missing when compounded flavors are used

Labeling

Tracy McNeill
Labeling Specialist
Alcohol Labeling and Formulation Division





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Overview

- Mandatory Information
- Organic Labeling
- Additional Information
- Q&A

27 CFR part 5



How to Apply for Label Approval

- The recommended method is submitting electronically using [COLAs Online](#)
- A paper alternative is also available
 - [TTB Form 5100.31](#) mailed to TTB (use address on the form)



Mandatory Information

On Designated Brand Label

- Brand Name
- Class/Type
- Alcohol Content

On Front, Back or Side Label

- Bottler's or Importer's Name and Address
- Net Contents
- Health Warning Statement
- Country of Origin (imported)

27 CFR 5.32



Mandatory Information (if applicable)

The following may appear on the designated brand label or a back label if applicable:

- 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



Brand Name

- 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 a designated 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.



Class and Type

Twelve Standards of Identity:

1. Neutral Spirits (Vodka)
2. Whisky
3. Gin
4. Brandy
5. Blended Applejack
6. Rum
7. Agave Spirits (e.g., Tequila)
8. Cordials and Liqueurs
9. Flavored Brandy, Flavored Gin, Flavored Rum, Flavored Vodka, and Flavored Whisky
10. Imitations
11. Geographical Designations
12. Products without Geographical Designations but Distinctive of a Particular Place

27 CFR 5.35



Class and Type (Continued)

- If product does not fall under one of the standards of identity, it 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
- 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
- Must appear on the designated brand label

27 CFR 5.35

Class and Type



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.



Alcohol Content

- ____% 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 designated brand label
- 27 CFR 5.37

Alcohol Content



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Bottler/Importer Name and Address

- 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



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750 ml

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Net Contents

- 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



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Health Warning Statement

- May appear on brand, back or side label

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.

27 CFR 16



Health Warning Statement (Continued)

- 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



Imported by XYZ Company

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750 ml

PRODUCT OF THE DOMINICAN REPUBLIC



GOVERNMENT WARNING:

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Country of Origin

- Imported distilled spirits labels must display the product's country of origin in compliance with Customs Border Protection requirements set forth at 19 CFR 134.

Country of Origin



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.



Coloring Materials

- 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

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

27 CFR 5.32



Cochineal Extract and Carmine

- 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

Required for:

- Whisky aged less than 4 years
- Grape lees brandy or grape pomace/grape marc brandy aged less than 2 years
- Distilled spirits labeled with a distillation date
- Allowed on all distilled spirits except neutral spirits (vodka)

27 CFR 5.40



Organic Labeling

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



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, 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

- 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)



What may I change on previously-approved labels?

- See the complete list of allowable revisions and specific guidelines on the COLA form or on www.ttb.gov
- We have also created sample labels to demonstrate each allowable revision



TTB Form 5100.31 pp. 3 & 4

IV. CONTACT INFORMATION

For Additional Information Contact:

Advertising, Labeling and Formulation Division (ALFD)
Alcohol and Tobacco Tax and Trade Bureau
1310 G. Street, N.W., Box 12
Washington, DC 20005
Phone (202) 453-2250
1-866-927-2533 (Toll Free)
E-mail address: alfd@ttb.gov

For A Supply Of This Form (TTB F 5100.31) Contact:

The form may be ordered electronically by accessing the TTB Web site at
http://www.ttb.gov/forms/ordering_forms.shtml
The form may be electronically accessed at the TTB Web site at
<http://www.ttb.gov/forms/f510031.pdf>

V. ALLOWABLE REVISIONS TO APPROVED LABELS

Once a label receives TTB approval, you are permitted to make certain changes to that label without submitting it to TTB. The label(s) identified on and affixed to this certificate may be revised without resubmission as follows:

NOTE: Any revision(s) you make to your approved label(s) must be in compliance with the applicable regulations in 27 CFR parts 4, 5, 7, and 16, and any other applicable provision of law or regulation, including, but not limited to, the conditions set forth in the "Comments" below.

	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
YOU MAY...				

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



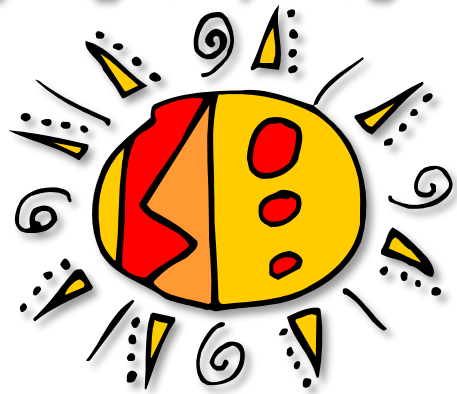
Allowable revision



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 Distillery
Springfield, Oregon

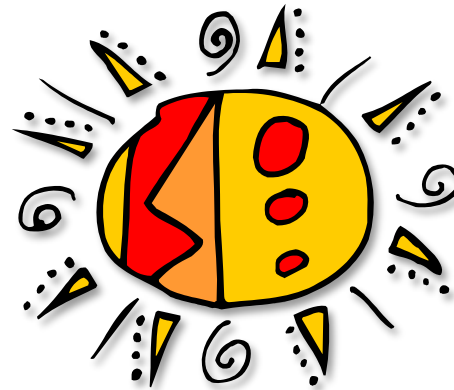


Vodka

40% Alc/Vol 750ml

Allowable revision

Vodka



SUNNYSIDE Distillery
Springfield, Oregon

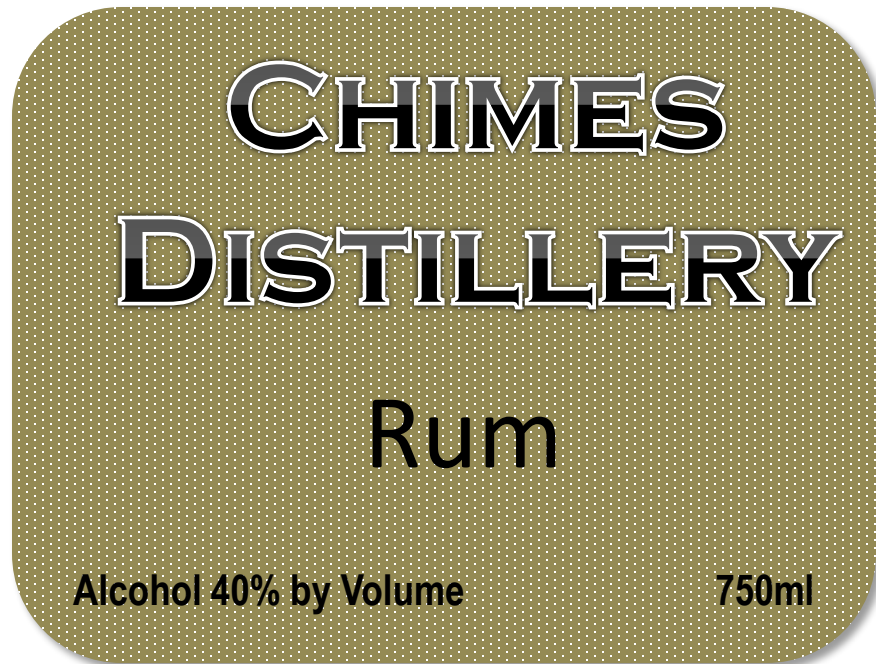
40% Alc/Vol 750ml

YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
3. Change the color(s) (background and text), shape and proportionate size of labels. Change the type size and font, and make appropriate changes to the spelling (including punctuation marks and abbreviations) of words, in compliance with the regulations. Change from an adhesive label to one where label information is etched, painted or printed directly on the container and vice versa.	YES	YES	YES	All mandatory information must be readily legible and appear on a contrasting background. If you received approval for a single label then you may not divide the label into multiple labels without re-approval. All changes must comply with applicable regulations, and changes in spelling must not change the meaning of the previously approved information.

Approved COLA



Allowable revision



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

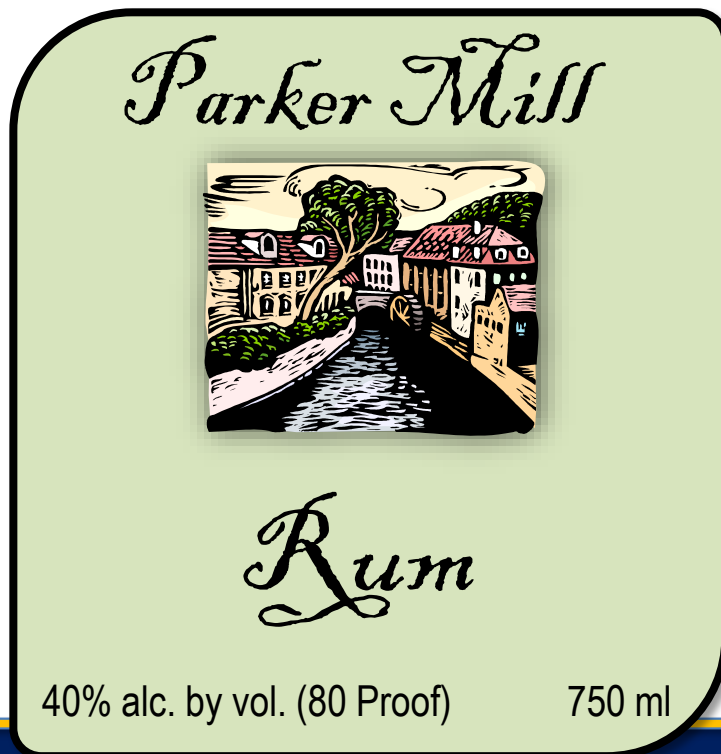


Allowable revision

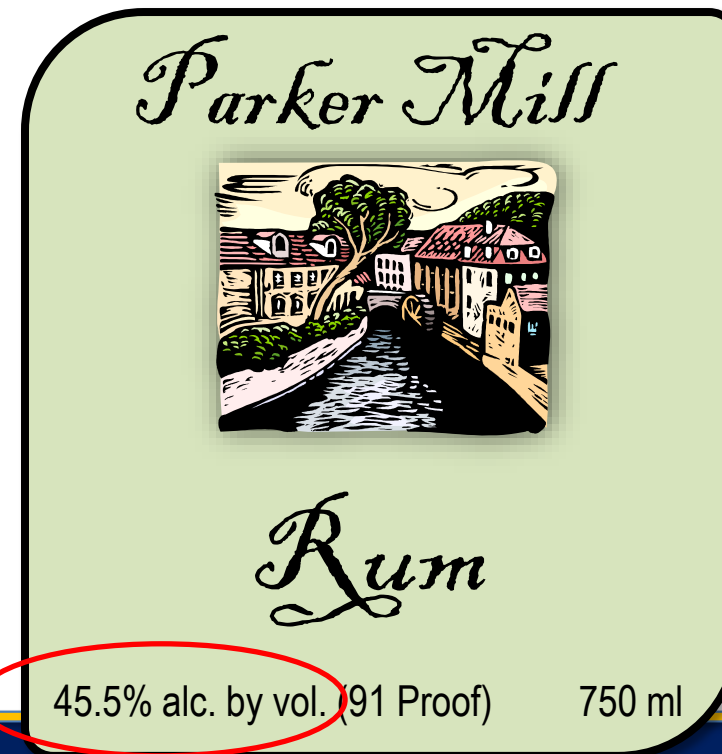


YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
11. Change the mandatory statement of alcohol content, where such change is not inconsistent with the labeled class and type designation, or with any other labeling statements.	YES	YES	YES (Flavored Malt Beverages Only)	The change must not result in a change to the labeled class or type designation of the product. For example, a label bearing a "table wine" designation may not be changed to state an alcohol content above 14 percent alcohol by volume, and a label bearing a "rum" designation may not be changed to state an alcohol content statement of less than 40 percent alcohol by volume. The change may not be inconsistent with any other mandatory or optional labeling statements.

Approved COLA



Allowable revision



YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
13. Change the statement of percentage of neutral spirits and the name of the commodity from which a distilled spirit is produced.	N/A	YES	N/A	These changes must not result in a change to the class or type designation of the distilled spirits product.

Approved COLA

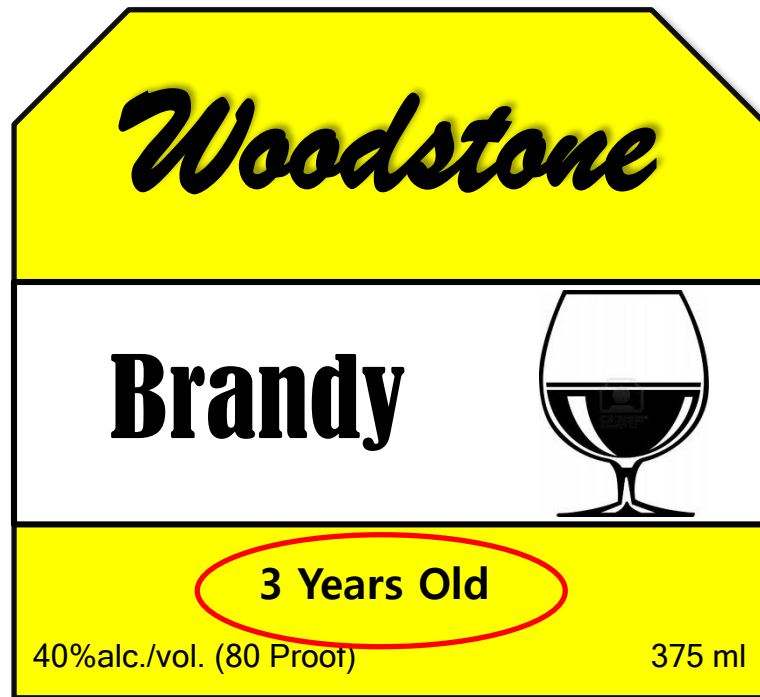


Allowable revision

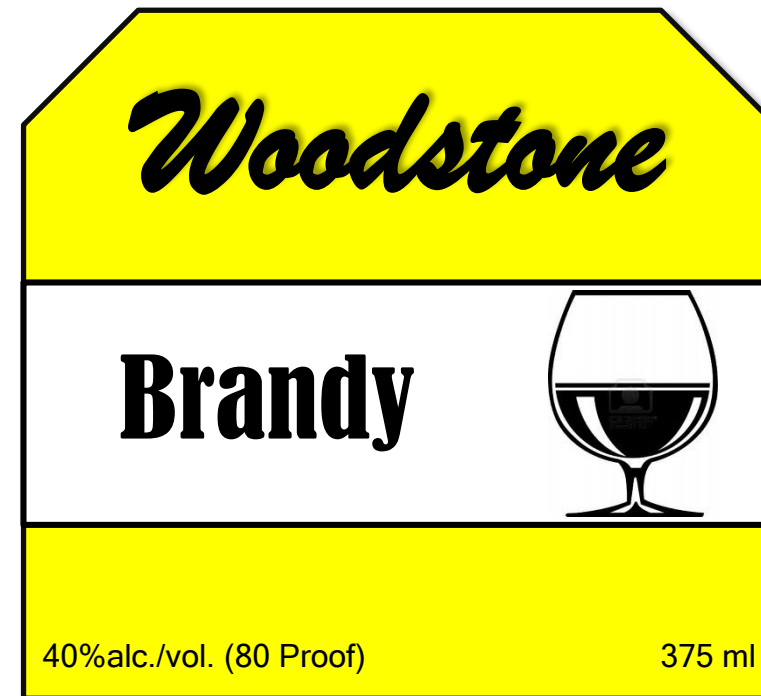


YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
14. Change the mandatory age statement, or delete or change an optional age statement for distilled spirits labels.	N/A	YES	N/A	These changes must not result in a change to the class or type designation. See 27 CFR 5.22 and 5.40 for further information about age statements and minimum aging requirements applicable to certain classes and types of spirits.

Approved COLA



Allowable revision



YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
22. Add, delete, or change bottle deposit information.	YES	YES	YES	

Approved COLA

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.

Bottled by:
Jim’s, Chicago IL

Allowable revision

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.

**CA REDEMPTION VALUE
OR 5¢ IA 5¢ MI 10¢ REF**

Bottled by:
Jim’s, Chicago IL

YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
23. Add, delete, or change UPC barcodes and/or 2D mobile barcodes, e.g., QR codes or Microsoft Tags.	YES	YES	YES	Addition or change of UPC Code must be in compliance with Industry Circular 77-23. Any information retrieved from 2D barcodes must be in compliance with all applicable advertising regulations.

Approved COLA

Allowable revision

Bottled by: Our Distillery
Ft. Mill, SC

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.



Bottled by: Our Distillery
Ft. Mill, SC

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.



YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
25. Add, delete, or change a lot or batch identification number or other serial numbers.	YES	YES	YES	

Approved COLA

Greenfield Vodka

Bottled by: Greenfield Vodka Company, Pittsburgh, PA

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.

BT 568799043

Allowable revision

Greenfield Vodka

Bottled by: Greenfield Vodka Company, Pittsburgh, PA

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.

BT 7553025

YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
26. Add, delete, or change trademark, copyright symbols (e.g., TM, ©, ®), kosher symbols, company logos, and/or social media icons.	YES	YES	YES	Symbols, logos and icons may not violate TTB regulations. Advertisements on social media sites must be in compliance with all applicable advertising regulations.

Approved COLA



Allowable revision



YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
27. Add, delete, or change optional information about awards or medals.	YES	YES	YES	

Approved COLA

MARCELLA'S DISTILLERY




Rum

Alc. 48% by Vol. 750ml


Allowable revision

MARCELLA'S DISTILLERY



Rum

Alc. 48% by Vol. 750ml



YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
28. Add, delete, or change holiday- and/or seasonal-themed graphics, artwork and/or salutations.	YES	YES	YES	Holiday/seasonal-themed information or graphics must not conflict with or qualify the mandatory information and must comply with all applicable regulations, including the rules governing prohibited practices.

Approved COLA



Allowable revision





Examples of Changes that CANNOT be Made

A new COLA is required if:

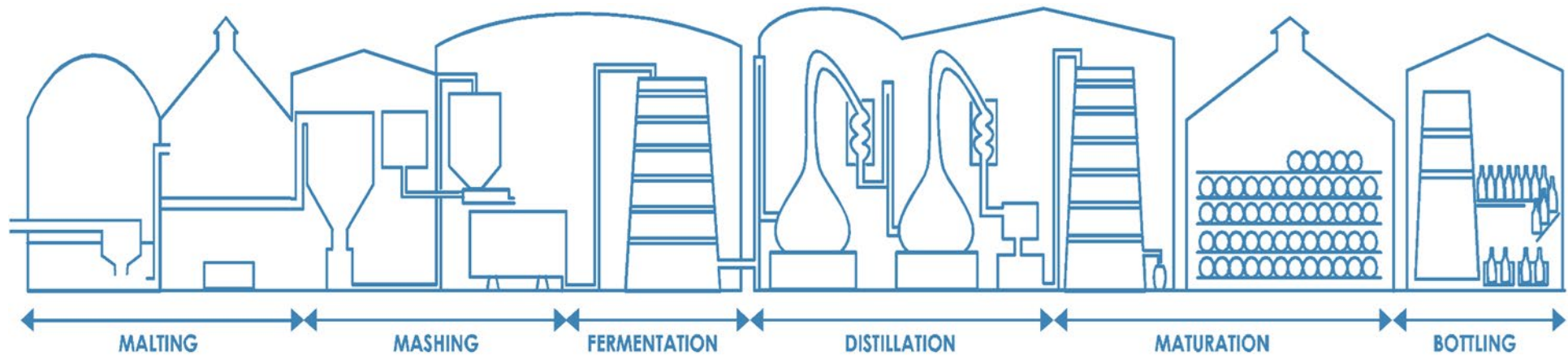
- The class/type changes (all commodities)
- Adding graphic that is not holiday themed
- Adding additional wording that was not on the approved label



Contact Information

- **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
 - **Online:** <https://www.ttb.gov/contact-alfd>

Distilled Spirits Resources





New Distilled Spirits Labeling Pages

- TTB.gov distilled spirits labeling pages updated July 2021
- New [distilled spirits labeling homepage](#) makes it easy to find and access distilled spirits labeling information
- We also created handy reference materials, including a [Mandatory Information Checklist](#) and the [Anatomy of a Distilled Spirits Label](#) interactive tool



Mandatory Information Checklist

CHECKLIST OF MANDATORY LABEL INFORMATION | DISTILLED SPIRITS

This guidance lists the mandatory information that TTB reviews on every distilled spirits label and certificate of label approval application and includes a checklist to help prevent common errors. This document does not provide comprehensive labeling guidance. Distilled spirits for which a certificate of label approval is required must be labeled in compliance with **all** applicable requirements in 27 CFR part 5 and 27 CFR part 16.

Mandatory Information that Must Appear on the Brand Label

The brand label is the label or labels bearing the brand name, alcohol content, and class/type designation in the same field of vision. The same field of vision means a single side of a container (bottle) where all of the pieces of information can be viewed simultaneously without the need to turn the container (for a cylindrical container, a side is 40 percent of the circumference). (See full definition in 27 CFR 5.11.)

Mandatory Item and Description	Regulatory Citation	Checklist
Brand Name Name under which the product will be sold.	27 CFR 5.34	<input type="checkbox"/> Does the brand name appear on the brand label? <input type="checkbox"/> Does it match the entry in the "Brand Name" field on the application?



Anatomy of a Distilled Spirits Label Tool

Anatomy of a Distilled Spirits Label Tool

The **Anatomy of a Distilled spirits Label** tool is an interactive tool that can help you learn more about how to create a distilled spirits label.



Brand
Label



Other
Label



BRAND NAME

Mandatory?	Placement Requirement?
Yes	Required to appear on the BRAND LABEL

Description

The brand name is the name under which a distilled spirits product or line of distilled spirits products are marketed.

See [Brand Name](#) for complete requirements.

TIPS

- The brand name must appear on the brand label.
- The brand name may not mislead the consumer about the age, origin, identity, or other characteristics of the product.
- The class/type designation (e.g., "Rum", "Bourbon" "Spiced Rum, Rum with natural flavors"), standing alone, may not be used as the brand name. However, if no other brand name appears on the label, the name of the bottler, packer, or importer will be treated as the brand name.



Internet Resources

Websites

- www.ttb.gov
- www.fda.gov
- www.ecfr.gov
 - 27 CFR parts 1, 5, 16, 19
- [Distilled Spirits Beverage Alcohol Manual](#)

Key Words

- TTB
- BAM
- Beverage Alcohol Manual
- Distilled Spirits Rulings
- eCFR
- COLA



Resources on TTB.gov

- **Alcohol Beverage Formula Approval Home Page**
<https://www.ttb.gov/formulation/index.shtml>
- **Subscribe to automatically receive the weekly TTB Newsletter**
<https://public.govdelivery.com/accounts/USTTB/subscriber/new>
- **Permits Online Help Center**
<https://www.ttb.gov/ponl/permits-online-help.shtml>



Resources on TTB.gov

- **Distilled Spirits Laws, Regulations, and Public Guidance:**
<https://www.ttb.gov/distilled-spirits/laws-regulations-and-public-guidance>
- **CBMTRA page:** <https://www.ttb.gov/alcohol/craft-beverage-modernization-and-tax-reform-cbmtra>
- **TTB Federal Register Publications:**
<https://www.ttb.gov/what-we-do/regs-guidance/federal-register-publications>