

## **CHAPTER 10**

### **SAMPLE WINE LABELS**

This chapter is designed to provide examples of approvable wine labels using the most common label formats submitted to the Alcohol and Tobacco Tax and Trade Bureau (TTB), along with additional comments to further explain some aspects of the labeling rules. The TTB regulations are quite detailed in regard to the production of a wine and the information appearing on the label, and although we have assembled some samples in this chapter that should prove useful, they are not intended to be all-encompassing.

These labels are all for 750 ml containers, so the type sizes are accurate. The smallest letter in all of the mandatory information statements is at least 2 mm in height, although the alcohol content statement could be as small as 1 mm in height but can be no larger than 3 mm in height. The Government Warning statement has no more than 25 characters per inch.

This information is being issued to help the public understand and comply with the laws and regulations that TTB administers. It is not intended to establish any new, or change any existing, definitions, interpretations, standards, or procedures regarding those laws and regulations.

## SAMPLE TABLE WINE BRAND LABEL

RED TABLE WINE
BOTTLED BY XYZ WINERY, CITY, STATE
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.
CONTAINS SULFITES
750 ML

This label contains all of the mandatory information for a typical domestic grape wine that contains at least 7 percent alcohol by volume but no more than 14 percent alcohol by volume.

In this example, since this product is not sold under a brand name, the name of the bottler also serves as the brand name for the label (27 CFR 4.33(a)). “Table Wine” is the class and type designation (27 CFR 4.21(a)(2)).

Also, when the type designation “Table Wine” appears on the brand label of a wine having at least 7 percent but no more than 14 percent alcohol by volume, a numerical alcohol content statement is not required. (27 CFR 4.36(a)).

**NOTE:** Bottlers of wine often obtain approval of “generic” wine labels in order to comply with the regulatory requirement to obtain a certificate of label approval (COLA) prior to bottling the wine. In some cases, the winery may then obtain a new COLA before removal of the wine, to reflect additional language placed on the label that is ultimately affixed to the bottle. In such cases, both the generic COLA number and the COLA number of the approved label ultimately affixed to the bottle should then be reflected in the bottled or packed wine record required by 27 CFR 24.308.

## SAMPLE DESSERT WINE BRAND LABEL

RED WINE
ALC. 14.1% BY VOL.
BOTTLED BY XYZ WINERY, CITY, STATE
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.
CONTAINS SULFITES
750 ML

This label contains all of the mandatory information for a typical domestic grape wine that contains more than 14 percent but not more than 24 percent alcohol by volume. TTB refers to wine of this class as “Dessert Wine” (27 CFR 4.21(a)(3)).

In this example, “Red Wine” is the class and type designation; however, “Dessert Wine” would also be an acceptable class and type designation for grape wine with an alcohol content in excess of 14 percent (27 CFR 4.21(a)(3)). Unlike “Table Wine,” the designation “Dessert Wine” does not suffice as an alcohol content statement. A numerical statement of the percentage of alcohol by volume is required for any wine with an alcohol content of more than 14 percent alcohol by volume (27 CFR 4.36(a)).

In this example, since this product is not sold under a brand name, the name of the bottler also serves as the brand name for the label (27 CFR 4.33(a)).

**NOTE:** Bottlers of wine often obtain approval of “generic” wine labels in order to comply with the regulatory requirement to obtain a COLA prior to bottling the wine. In some cases, the winery may then obtain a new COLA before removal of the wine, to reflect additional language placed on the label that is ultimately affixed to the bottle. In such cases, both the generic COLA number and the COLA number of the approved label ultimately affixed to the bottle should then be reflected in the bottled or packed wine record required by 27 CFR 24.308.

## SAMPLE STANDARD ONE-PIECE WINE BRAND LABEL

ABC WINES
AMERICAN MERLOT
ALC. 15.5% BY VOL.
BOTTLED BY XYZ VINTNERS, CITY, STATE
750 ML
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. <b>CONTAINS SULFITES</b>

This wine is designated as “American Merlot.” “American” represents the appellation of origin (27 CFR 4.25(b)) and “Merlot” represents the varietal designation (27 CFR 4.23(b)). This designation means that at least 75 percent of the wine is derived from Merlot grapes grown in the United States.

Since a varietal designation (Merlot) is used on this label, an appellation of origin (American) is required (27 CFR 4.23(a)). The appellation must appear in direct conjunction with the class/type designation (27 CFR 4.34(b)); this requirement is satisfied because both are on the same label. On this label, the mandatory sulfite statement is in bold print and flush right to comply with the requirement that the health warning statement be separate and apart from all other information (27 CFR 16.21).

In this example “ABC Wines” serves as the brand name for the label (27 CFR 4.33(a)).

## SAMPLE STANDARD TWO-PIECE WINE LABEL

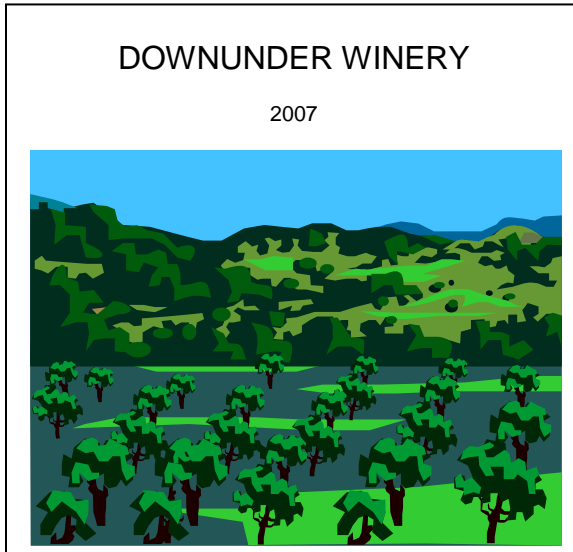
ABC WINERY 2008 <b><i>Fanciful Name Rose</i></b> ZZZ COUNTY ROSE WINE ALC. 12.5% BY VOL.	BOTTLED BY ABC WINERY, CITY, STATE CONTAINS SULFITES 750 ML  GOVERNMENT WARNING: (1) ACCORDING TO THE SURGEON GENERAL, WOMEN SHOULD NOT DRINK ALCOHOLIC BEVERAGES DURING PREGNANCY BECAUSE OF THE RISK OF BIRTH DEFECTS. (2) CONSUMPTION OF ALCOHOLIC BEVERAGES IMPAIRS YOUR ABILITY TO DRIVE A CAR OR OPERATE MACHINERY, AND MAY CAUSE HEALTH PROBLEMS.
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↑ Brand Label ↑

This example provides an optional fanciful name. Fanciful names do not replace the need for a class and type designation (in this case, “Rose Wine”) (27 CFR 4.34(a)). Also keep in mind that “Rose” (like “red,” “pink” “amber,” or “white”) must be followed by “Wine” in order to serve as the class and type designation (27 CFR 4.21(a)(1)(iv)).

In addition, because this wine is vintage dated, an appellation of origin is required (27 CFR 4.27(a)). The appellation must appear in direct conjunction with the class and type designation (27 CFR 4.34(b)); this requirement is satisfied because both are on the same label. In this case, a county serves as the appellation of origin.

## SAMPLE IMPORTED WINE LABEL WITH ADDITIONAL STRIP 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.  
CONTAINS SULFITES

↑ Brand Labels ↓

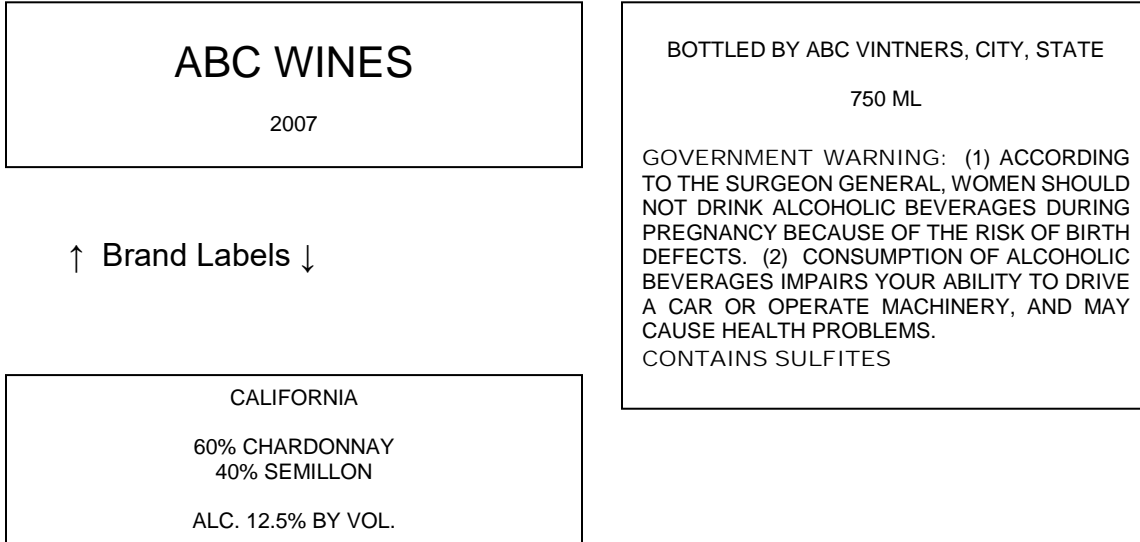
RED WINE	VICTORIA	12% ALC./VOL.
IMPORTED BY OZ IMPORTS, CITY, STATE		
PRODUCT OF AUSTRALIA	750 ML	

The “DOWNUNDER WINERY” label is an example of a label applied by the foreign winery. In order to qualify for TTB approval, the U.S. importer may have the foreign winery affix an additional “strip” label to the bottle in order to bring it into compliance with the requirements of the regulations. The “strip” label must appear on the same face of the container as the label with the brand name if it contains mandatory information (such as the designation “red wine”) that must appear on the brand label. (27 CFR 4.32(a)).

An appellation of origin is required on this label because it is labeled with a vintage date (27 CFR 4.27(a)). Accordingly, it is important to remember that *the appellation of origin* (in this case, “Victoria”) must appear in direct conjunction with *the class and type designation* (in this case, “Red Wine”) (27 CFR 4.34(b)). This requirement is satisfied because they are on the same label.

In this example Downunder Winery is the brand name for the label (27 CFR 4.33(a)). “Product of Australia” serves as the country of origin statement in accordance with U. S. Customs and Border Protection regulations.

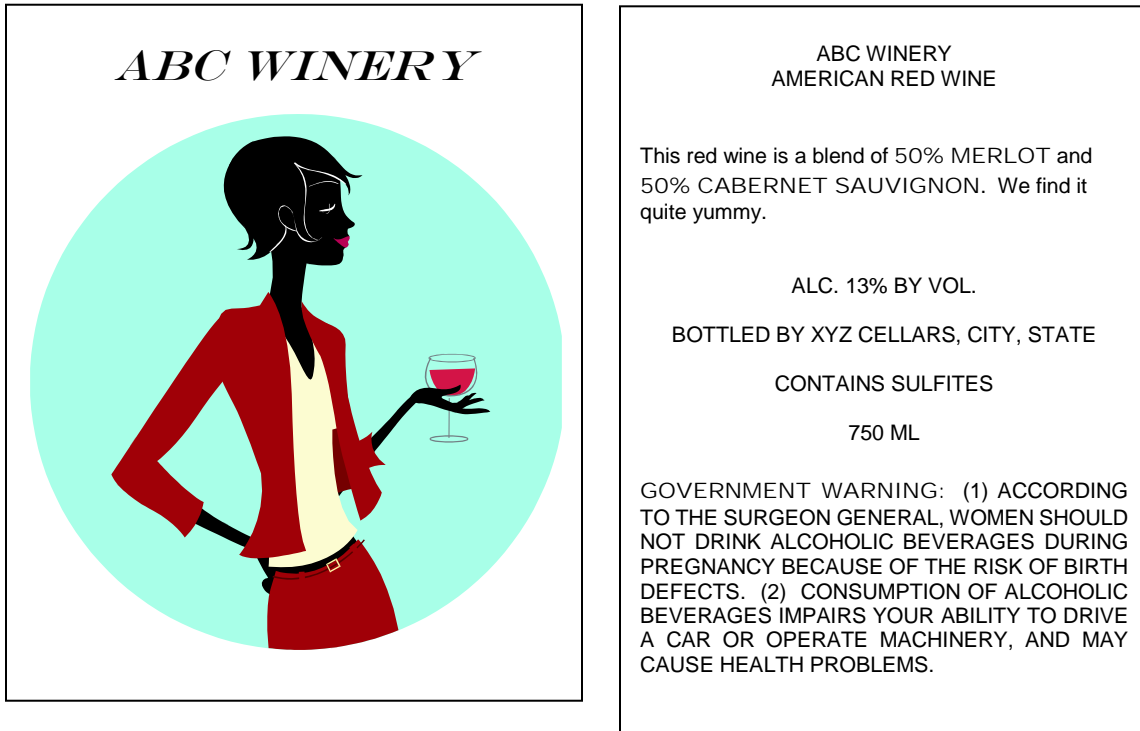
## SAMPLE DOMESTIC THREE-PIECE WINE LABEL



When designing three-piece brand labels for a wine with a varietal designation or a vintage date, it is important to remember that *the appellation of origin* (in this case, “California”) must appear in direct conjunction with *the class and type designation* (in this case, the grape varieties and their percentages). See 27 CFR 4.34(b). This requirement is satisfied because they both appear on the same label. The brand name is “ABC Wines” (27 CFR 4.33(a)).

NOTE: When the names of two or more grape varieties appear on the brand label, this is treated as the type designation, and the percentages of each grape type must be shown and must total 100 percent (27 CFR 4.23(d)).

## SAMPLE BOTTLER/IMPORTER-DESIGNATED-BRAND LABEL



↑ Brand Label ↑

This label is acceptable because it contains the mandatory brand label information and the bottler/importer has designated it as the “brand” label on the COLA submission. However, since this label is to be considered the brand label, it must meet all of the brand-label requirements, and brand-label requirements are more stringent than back-label requirements.

For example, brand-label varietal references are treated as the type designation, even where another designation (such as “red wine”) appears on the brand label. When using a single grape variety or two or more grape varieties as the type designation, the varietals (and their percentages) must be in at least 2 mm print and must appear separate and apart from, or more conspicuous than, surrounding text. If the mandatory information appears surrounded by other text, it must be substantially more conspicuous than the surrounding text. (27 CFR 4.38(b)). This requirement is satisfied if the mandatory information appears in bold print or in a type size that is at least twice the size of the surrounding text.



## “NON-STANDARD WINE” LABEL

<p>ABC WINERY</p> <p><i>(Optional Fanciful Name)</i></p> <p>RED WINE WITH NATURAL FLAVORS</p> <p>ALC. 12.5% BY VOL.</p>	<p>BOTTLED BY ABC VINTNERS, CITY, STATE</p> <p>CONTAINS SULFITES</p> <p>750 ML</p> <p>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.</p>
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↑ Brand Label ↑

These labels contain all of the mandatory information for a wine that is not defined in the standards of identity found in the TTB regulations, and thus must be designated with a truthful and adequate statement of composition, which is considered the mandatory class and type designation, and must appear on the brand label. This kind of wine must obtain formula approval prior to the submission of the label. The formula approval will include a suggested statement of composition (e.g. “Grape wine with natural flavors added”); however, industry members may obtain approval for a more specific statement of composition on their application for label approval.

Please note that a fanciful name is optional and may be shown on the label, but it does not replace the need for a statement of composition (27 CFR 4.34(a)).

The statement of composition for such wines may not include references to a varietal designation, a type designation of varietal significance, a semi-generic geographical type designation, or a geographic distinctive designation (27 CFR 4.34(a) and 4.39(n)).