CHECKLIST OF MANDATORY LABEL INFORMATION | WINE

This guidance lists the mandatory information that TTB reviews on every wine label and certificate of label approval application and includes a checklist to help prevent common errors. This document does not provide comprehensive labeling guidance. Wine for which a certificate of label approval is required must be labeled in compliance with **all** applicable requirements in 27 CFR part 4 and 27 CFR part 16.

Mandatory Information that Must Appear on the Brand Label		
Any label may be designated as the brand label provided it contains these items (if applicable)		
Mandatory Item and Description	**Regulatory Citation**	**Checklist**
Brand Name Name under which the product will be sold.	27 CFR 4.33	☐ Does the brand name appear on the brand label? ☐ Does it match the entry in the "Brand Name" field on the application?

Designation:
 	
Class/Type Designation
 	
Examples: "Red Wine," "Sparkling Wine," "Peach Wine," "Honey Wine," or "Chardonnay"
 	
OR Statement of Composition
 	
A truthful and adequate statement of composition in lieu of a class designation if the class of wine is not defined in 27 CFR 4.21.
	27 CFR 4.21
	
	27 CFR 4.34
	
	27 CFR 4.91 (grape varietals approved for domestic wine)
		☐ Does the designation appear on the brand label?
		☐ If the designation is a class or type, is it consistent with a class or type listed in the regulations?
		☐ Is the designation separate and apart from all other information?
		☐ Is it spelled correctly?
		☐ Are one or more grape varietals listed on the brand label? *A varietal is considered the class/type designation if it is present on the brand label.*
		    ☐ If yes, does the listing match the "Grape Varietal(s)" field on the application?
		    ☐ For domestic wine, is each varietal approved for domestic use?
		☐ Is it a wine that requires a formula? (Check wine formula requirements here.)
		    ☐ If yes, is the statement of composition the same as the suggested general statement on the approved formula (under Determination and Labeling Instructions) or more specific?
		    ☐ Has the approved formula number been selected on the application?
		☐ Are this and other labels on the container free from conflicting or inconsistent designations? (e.g., "red wine with natural flavors" vs. "red wine")

Appellation of Origin An area where the fruit or agricultural product used to make the wine was grown.	27 CFR 4.25 27 CFR 4.34	Generally, mandatory ***ONLY*** if the label contains a grape varietal type designation, a type designation of varietal significance, a vintage date, or a semi-generic type designation, or if the product is labeled as estate bottled. See Appellation of Origin for more information. ☐ Is the country, state, county, American Viticultural Area or other appellation shown on the brand label together with the designation? ☐ Does the appellation on the label match the "Appellation" field on the application?
Percentage of Foreign Wine Example: 50% American wine/50% French wine	27 CFR 4.32(a)(4)	Mandatory for blends of American and foreign wine ***ONLY*** if the label refers to foreign wine.

Mandatory information that May Appear on ANY Label		
Mandatory Item and Description	**Regulatory Citation**	**Checklist**
Alcohol Content Example: Alcohol ___% by volume	27 CFR 4.36	☐ Is the alcohol content stated on the label? See Alcohol Content for rules on table wine. ☐ Are the format and abbreviations acceptable? You may use: "Alc.", "Alc", "Vol.", "Vol" or "%".
Net Contents Volume of wine in container.	27 CFR 4.37	☐ Is the net contents statement present on the label or blown into or marked on the container? ☐ Are the format and abbreviations acceptable (e.g., 750 mL, 1 L)? ☐ Does it meet an approved standard of fill? Only a standard of fill approved in 27 CFR 4.72 is acceptable in most cases. Exceptions: See 27 CFR 4.70(b)
Name and Address The name and address (city and state) as listed on your permit.	27 CFR 4.35	☐ Is the name and address on the label? ☐ Does the name on the label match what is shown on the permit listed on your application? ☐ If not, is the DBA/trade name on the label shown on both the application and the permit? ☐ Does the address (city and State) on the label match the address on your application? ☐ Does the name and address immediately follow a phrase such as "Bottled By" or "Imported By", respectively, with no intervening text?
Sulfite Declaration Example: "Contains Sulfites"	27 CFR 4.32(e)	Must appear if the product has 10 ppm or more (total) sulfur dioxide. ☐ "No sulfites added" may be stated but must appear together with the phrase "contains naturally occurring sulfites" or "may contain naturally occurring sulfites." ☐ If the label does not have a sulfite declaration, are you required to include with your application a corresponding sulfite analysis conducted by a TTB laboratory that shows that the wine contains less than 10 ppm sulfites?
Health Warning Statement Statement must appear exactly as prescribed in the regulations.	27 CFR part 16	☐ Is the statement on the label? ☐ Does it match the exact wording and punctuation? ☐ Are the words "**GOVERNMENT WARNING**" in capital letters and bold type? ☐ Are the "S" in Surgeon and "G" in General capitalized? ☐ Does it appear as one statement? ☐ Is it separate and apart from other information on the label?
Country of Origin Imported wines only Required by U.S. Customs and Border Protection (CBP).	19 CFR 134.11	☐ Is the country of origin statement on the label? ☐ Does the format of the country of origin statement comply with CBP regulations? **NOTE:** Questions about the appropriate country of origin should be directed to CBP.
FD&C Yellow #5 Example: "Contains FD&C Yellow #5"	27 CFR 4.32(c)	Mandatory ***ONLY*** if FD&C Yellow #5 is used in the wine. ☐ Is the statement on the label?
Cochineal Extract or Carmine Example: "Contains Carmine:"	27 CFR 4.32(d)	Mandatory ***ONLY*** if used in the wine. ☐ Is the statement on the label?