



TTB Boot Camp for Wineries

LABELING



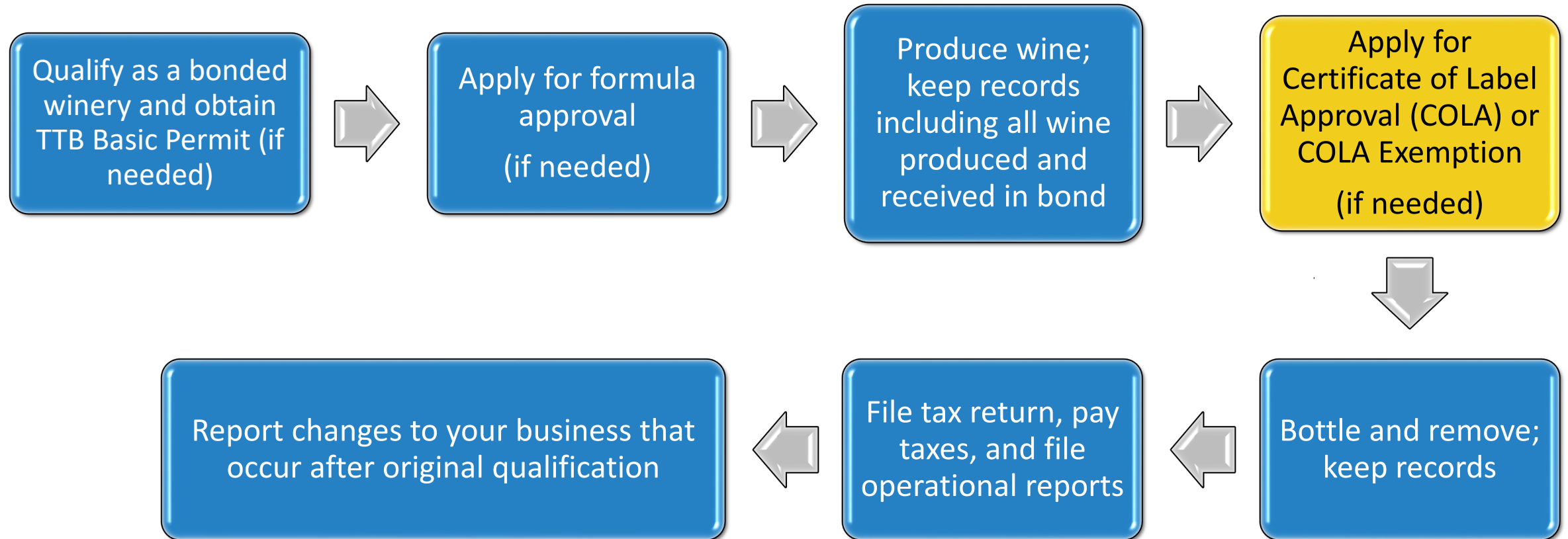
TTB Disclaimer

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 documents (such as records, returns, and labels) are for illustrative purposes only and contain fictitious data



Typical TTB Touchpoints for Bonded Wineries





Agenda

In this introductory session we will cover these topics:

- Mandatory Label Information
- Top Labeling Errors
- COLAs Online
- Allowable Revisions
- Resources

Labeling Regulations





TTB Laws and Regulations for Wine

Domestic Producers*

Internal Revenue Code (IRC)

- [Part 24](#) Wine- Tax payments, premises requirements which protect the revenue, production, formulas (if applicable), etc.

Federal Alcohol Administration Act (FAA Act)

- [Part 1](#) Basic Permits
- [Part 4](#) Labeling and Advertising of Wine
- [Part 9](#) American Viticultural Areas
- [Part 16](#) Health Warning Statement
- Parts [6](#), [8](#), [10](#) and [11](#) Trade Practices

27 CFR

* Not a complete list



IRC Requirements for Wine

The Internal Revenue Code (IRC) implementing regulations (27 CFR part 24) cover issues such as:

- Qualification/registration of bonded wine premises
- Production requirements
- Formulas (for some)
- Recordkeeping/reports
- Taxes
- Basic labeling/marketing

The part 24 regulations apply to all domestic commercial cideries making product with 0.5% ALC. BY VOL. or more.

[27 CFR part 24](#) (domestic)

[27 CFR part 27](#) (imports)



FAA Act Requirements for Wine

- FAA Act defines wine as having from 7% to 24% alcohol by volume
- The implementing regulations (27 CFR) cover issues such as:
 - Labeling
 - Certificates of Label Approval (COLA)
 - Qualification (Basic Permit)
 - Advertising
 - Trade practices

The FAA regulations only apply if ALC. BY VOL. is 7% or more, and product is sold/offered for sale interstate

27 CFR parts [1](#), [4](#), [6](#), [8](#), [10](#), [11](#), and [13](#)



Which Labeling Laws and Regulations Apply?

Law	Regulations	If the alcohol content (alc/vol) is:	
		0.5% to <7%	7% to 24%
Alcohol Beverage Labeling Act of 1988 (ABLA) 27 U.S.C. 213, et seq.	27 CFR part 16 – Alcoholic Beverage Health Warning Statement	X	X
Internal Revenue Code (IRC) 26 U.S.C. Chapter 51	27 CFR part 24 – Wine 27 CFR part 27 – Importation of Distilled Spirits, Wines, and Beer	X	X
Federal Alcohol Administration (FAA) Act 27 U.S.C. 201, et seq.	27 CFR part 4 – Labeling and Advertising of Wine		X COLA if sold in interstate commerce, COLA Exemption if only sold intrastate
Federal Food, Drug, and Cosmetic Act (FD&C Act) 21 U.S.C. 341-350	21 CFR part 101 – Food Labeling	X	

Mandatory Label Information





Mandatory Label Information

Required Information on the Brand Label

- Brand Name
- Class/Type Designation
- Appellation of Origin (in certain circumstances)
- Percentage of Foreign Wine (if applicable)

Either the front or back label may be the designated as the “brand label.”

Required Information on Any Label

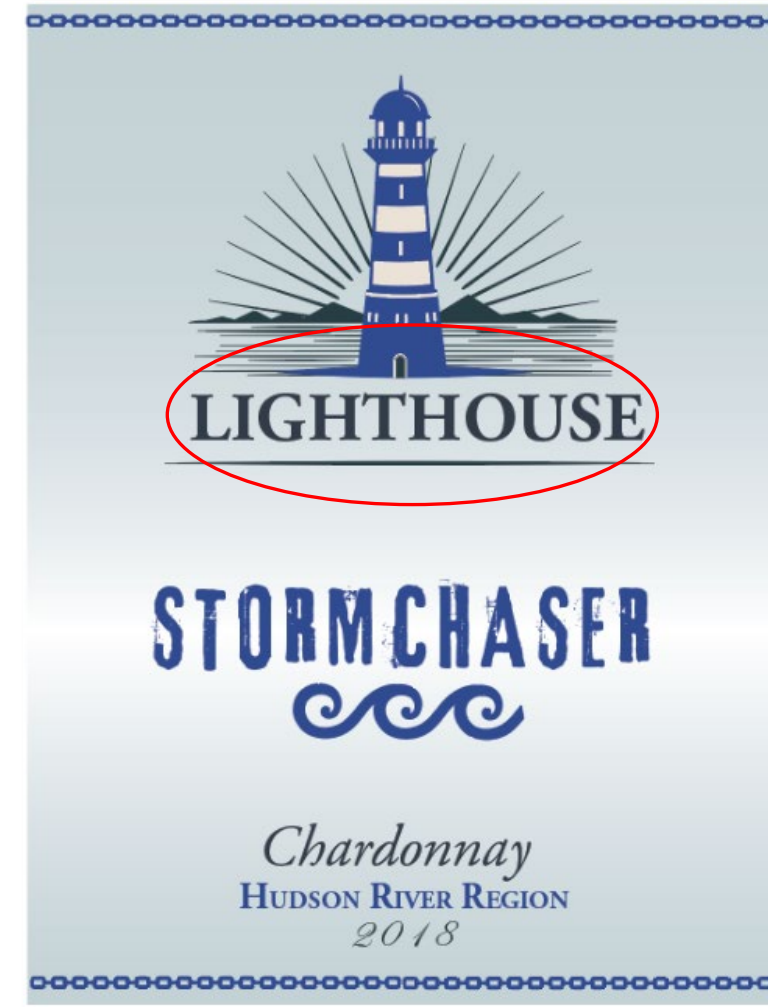
- Name & Address of Bottler/Importer
- Net Contents
- Alcohol Content
- Sulfite Declaration
- Health Warning Statement
- Country of Origin (imported only)
- Color Ingredient Disclosure (if applicable)

27 CFR 4.32



Brand Label: Brand Name

- The brand name is the name under which a wine or line of wines is marketed.
- The brand name **must** appear on the brand label.
- The brand name may not create a **misleading impression**.
- The **class/type** designation (e.g., "Chardonnay," "White Wine"), standing alone, may not be used as the brand name.
- If **no other brand name** appears on the label, the name of the bottler, packer, or importer will be treated as the brand name.



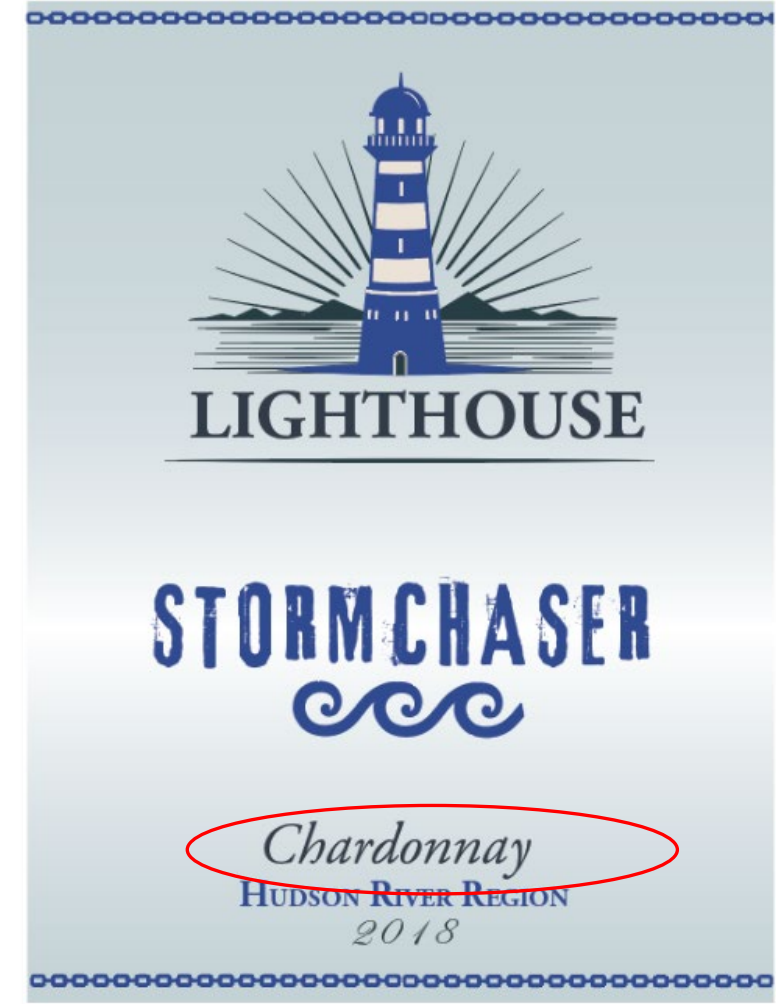
27 CFR 4.33



Brand Label: Class/Type Designation

- A class/type designation is a categorical description of the wine in the container, based on the defined standards of identity found in 27 CFR 4.21.
- To label and market your wine under a particular class/type designation, the wine must meet the regulatory standards of identity for that class/type.

27 CFR 4.34





Brand Label: Class/Type Designation

- Eight general **classes** of wine.
- Most classes are subdivided into more specific **types** of wine.
- Generally, the class and/or type designation may be used to meet the mandatory labeling requirement.

Class Example	Type Example
Grape Wine	Red Wine, Merlot, Table Wine
Sparkling Grape Wine	Sparkling Chardonnay, Sparkling Red Wine
Fruit Wine	Cider, Perry, Strawberry Dessert Wine

27 CFR 4.21



Brand Label: Class/Type Designation

- Wines that do not meet the definition of any of the standards of identity are considered **wine specialty products** and are subject to different class/type labeling requirements.
- Adding flavors, colors, or spices to your wine will generally result in your wine being classified as a wine specialty product.
- Wine specialty products must be labeled with a truthful and adequate statement of composition.
- Required to appear on brand label.

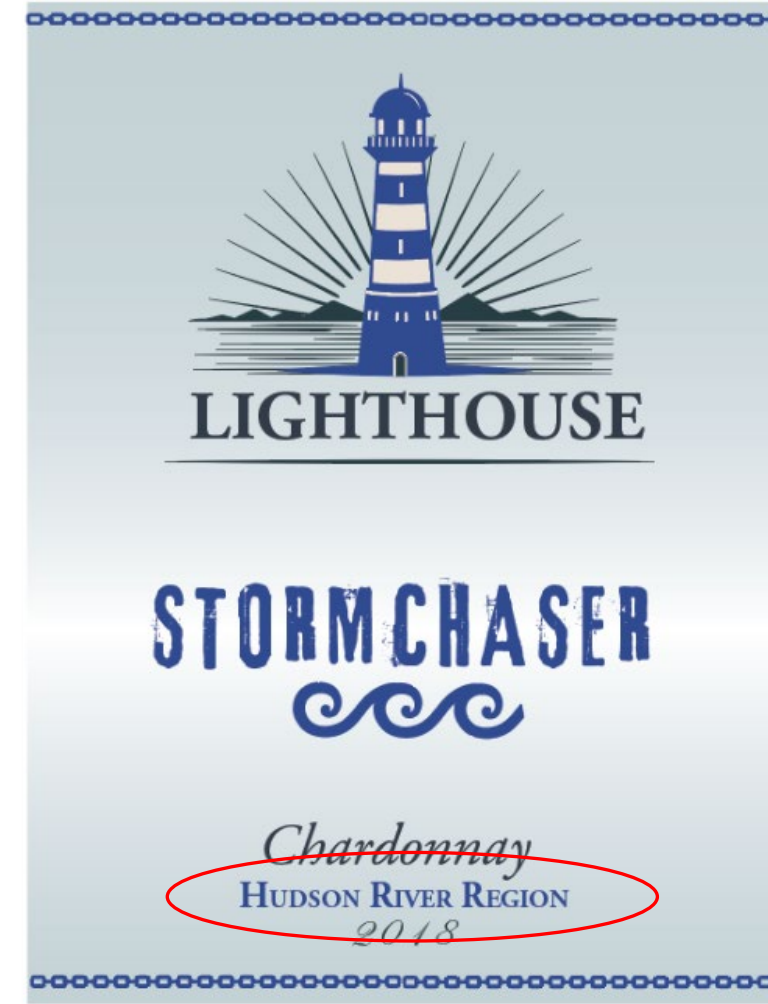
Note: Wine specialty products require **formula approval** prior to applying for a COLA.



Brand Label: Appellation of Origin

- An **appellation of origin** generally designates the geographic area (or areas) where the fruit or other agricultural products used to make the wine were grown.
- In general, the **appellation** can be:
 - For **Domestic wine**: The United States, a state(s), a county(s), or an approved American Viticultural Area(s).
 - For **Imported wine**: a foreign country, a state(s), county, or similar political subdivision, or an viticultural area.

27 CFR 4.25

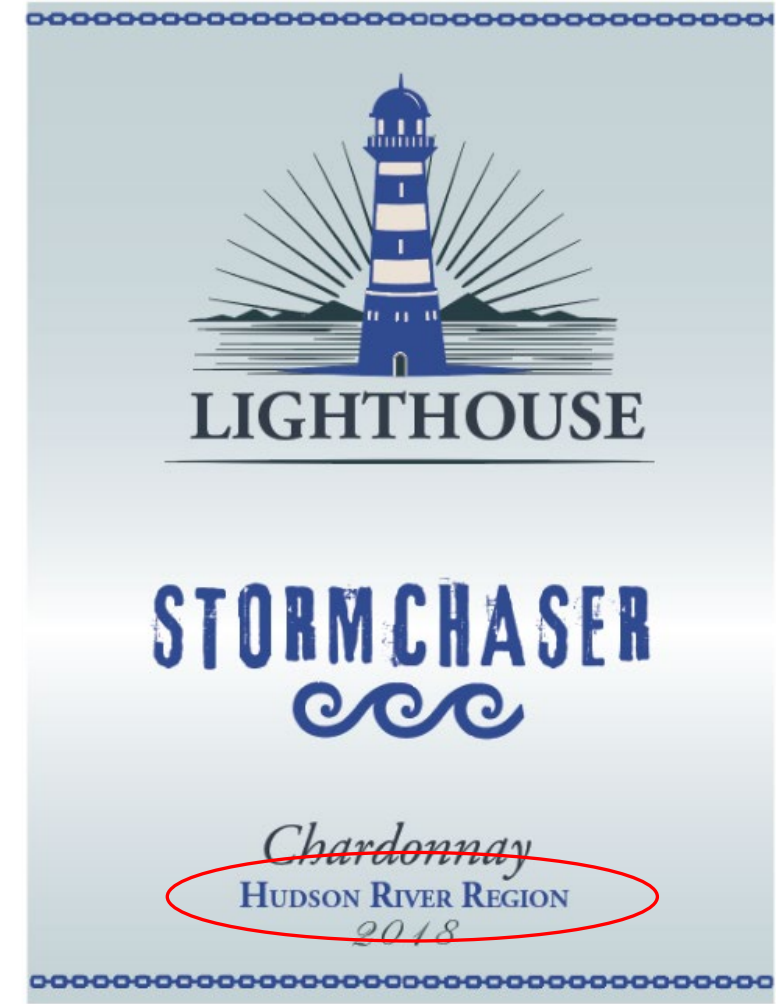




Brand Label: Appellation of Origin

- Mandatory if any of the following appear on the label:
 - Grape varietal
 - Vintage date
 - Semi-generic designation (if grandfathered)
 - Estate bottled
- Must appear on brand label, if required.

27 CFR 4.25





Brand Label: Appellation of Origin

American Viticultural Area (AVA): A type of appellation specific to grape wines. It is a defined grape-growing region having a name, distinguishing features, and a delineated boundary as established in 27 CFR part 9.

- Must be fully finished within same state as AVA*

*except for cellar treatment under §4.22(c), and blending that does not result in an alteration of class or type under §4.22(b)

27 CFR 4.25 and part 9



Brand Label: Foreign Wine

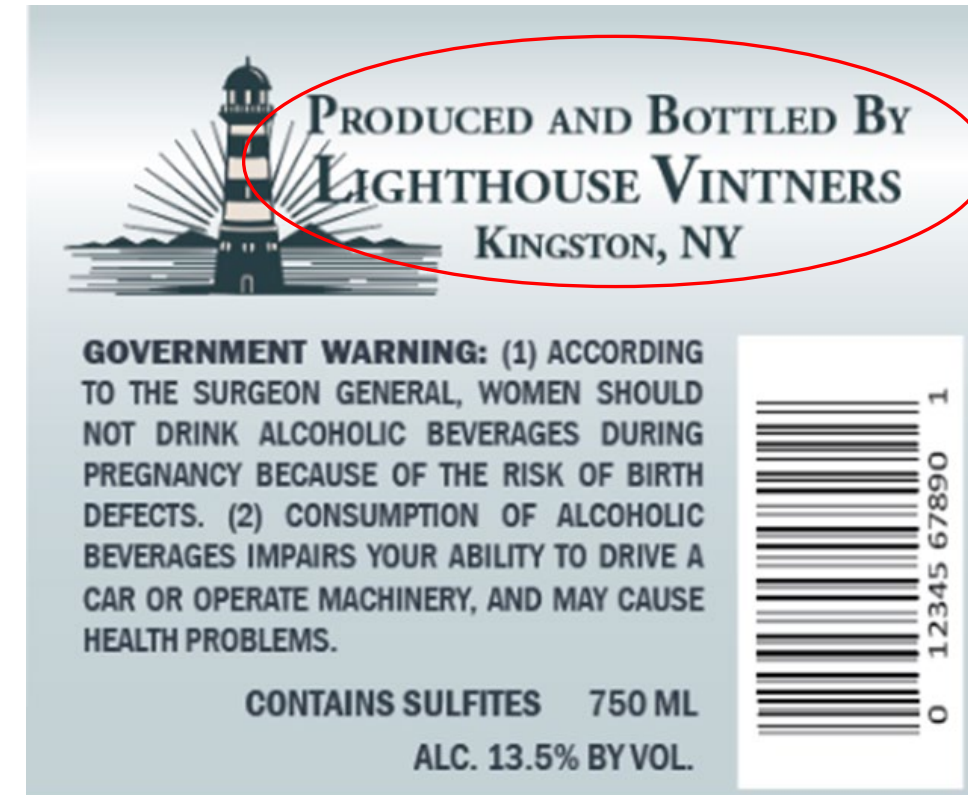
A statement of the percentage and origin of foreign wine is required on blends of American and foreign wines if any reference to the presence of foreign wine is made on the label.

➤ e.g., "30% Grape Wine from Italy"



Any Label: Name and Address Statement

- The **name and address** (city and state) of the bottler or importer must appear on the label, as shown on their **basic permit**.
- A **trade name/DBA** approved by TTB may be used in place of the official operating name, if on the **basic permit**.
- “Bottled By,” “Packed by,” or “Imported by” are **acceptable formats**.
- Additional words **may not** appear within the name and address statement, **except to** use additional, optional phrases authorized by regulations.



27 CFR 4.35



Any Label: Name and Address Statement

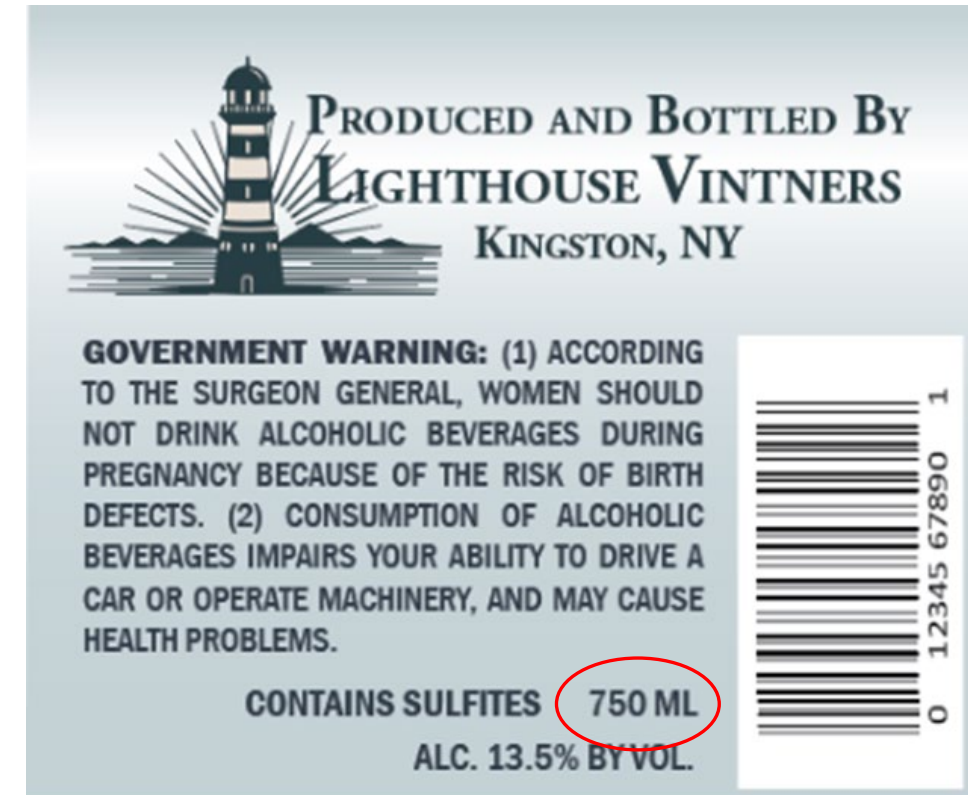
PHRASE	IF the Named Winery, at that location...
Produced and bottled by Made and bottled by	Fermented not less than 75% of the wine, Changed the class or type, or Produced sparkling wine by secondary fermentation
Blended and bottled by	Mixed the wine with other wines of the same class and type
Prepared and bottled by Cellared and bottled by Vinted and bottled by	Subjected the wine to cellar treatment

27 CFR 4.35



Any Label: Net Contents

- Metric standards of fill; authorized sizes per 27 CFR 4.72.
- “mL” on containers of less than 1 liter and “L” on container of one liter or more.
- May be on label or etched/blown into the container.
- May appear on any label.
- The net contents indicated on a label may be changed without applying for a new COLA. A separate COLA is not needed for every standard of fill.



27 CFR 4.37



Any Label: Net Contents – Standards of Fill

The following metric standards of fill are authorized for wine:

50 milliliters	250 milliliters	375 milliliters	600 milliliters	1 liter
100 milliliters	300 milliliters	473 milliliters	620 milliliters	1.5 liters
180 milliliters	330 milliliters	500 milliliters	700 milliliters	1.8 liters
187 milliliters	355 milliliters	550 milliliters	720 milliliters	2.25 liters
200 milliliters	360 milliliters	568 milliliters	750 milliliters	3 liters

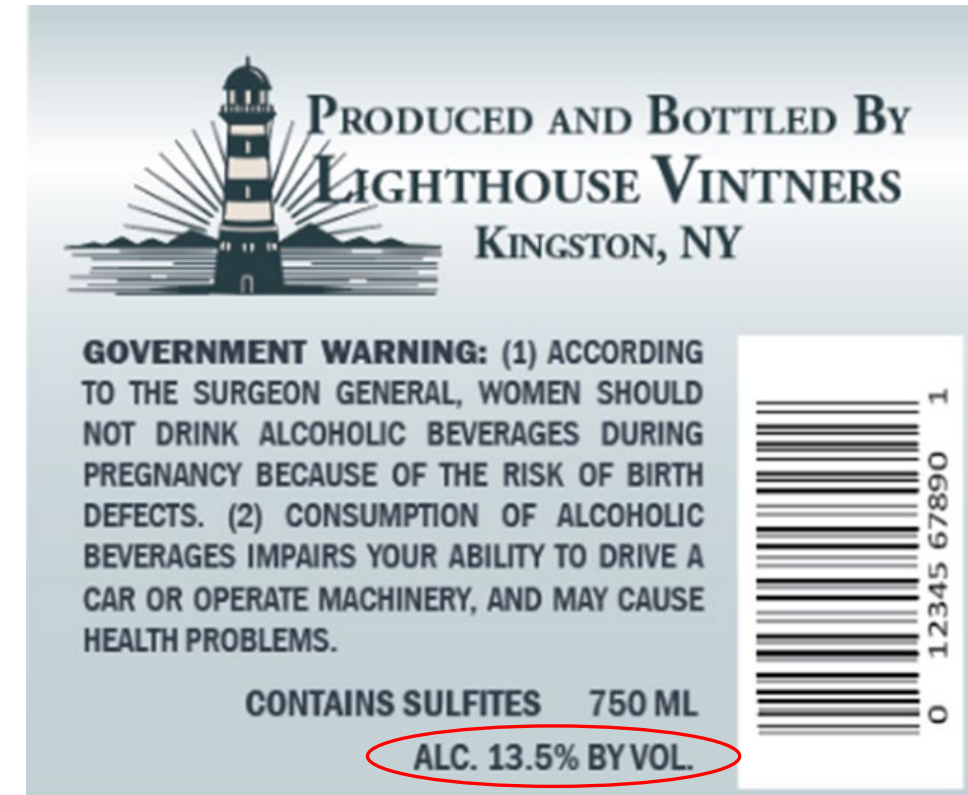
- Wine may be bottled or packed in containers of 4 liters or larger if the containers are filled and labeled in quantities of even liters (4 liters, 5 liters, 6 liters, etc.).
- Containers 18L or greater are exempt from the general standards of fill under 4.70(b)(2).
- The 473 mL and 568 mL sizes correspond to 16 oz. and 19.2 oz. respectively.
- Sizes shaded in blue were authorized January 2025.

27 CFR 4.72



Any Label: Alcohol Content

- The alcohol content is a numerical indication of the alcohol content of the wine stated in terms of percent alcohol by volume.
- For wines over **14 percent** alcohol by volume, a numerical alcohol content statement is **mandatory**.
- **Table Wine** or **Light Wine** may be used in place of a percentage for wine with 7-14% alcohol by volume.



27 CFR 4.36



Any Label: Alcohol Content

May appear as either a specific number or as a range (tolerances apply)

- **If stated as a specific number**, alcohol content is allowed to vary from the stated alcohol:
 - +/- 1.5% for $\leq 14\%$
 - +/- 1% for $> 14\%$
- **If stated as a range**, alcohol content must be within the stated range, and the range can be:
 - 3% for $\leq 14\%$
 - 2% for $> 14\%$

***Range cannot cross tax classes.**

Acceptable formats

- “Alcohol ____ % by volume;” or “____%”
- “Alc. By Vol.”
- “____% to ____% alc. by vol.”

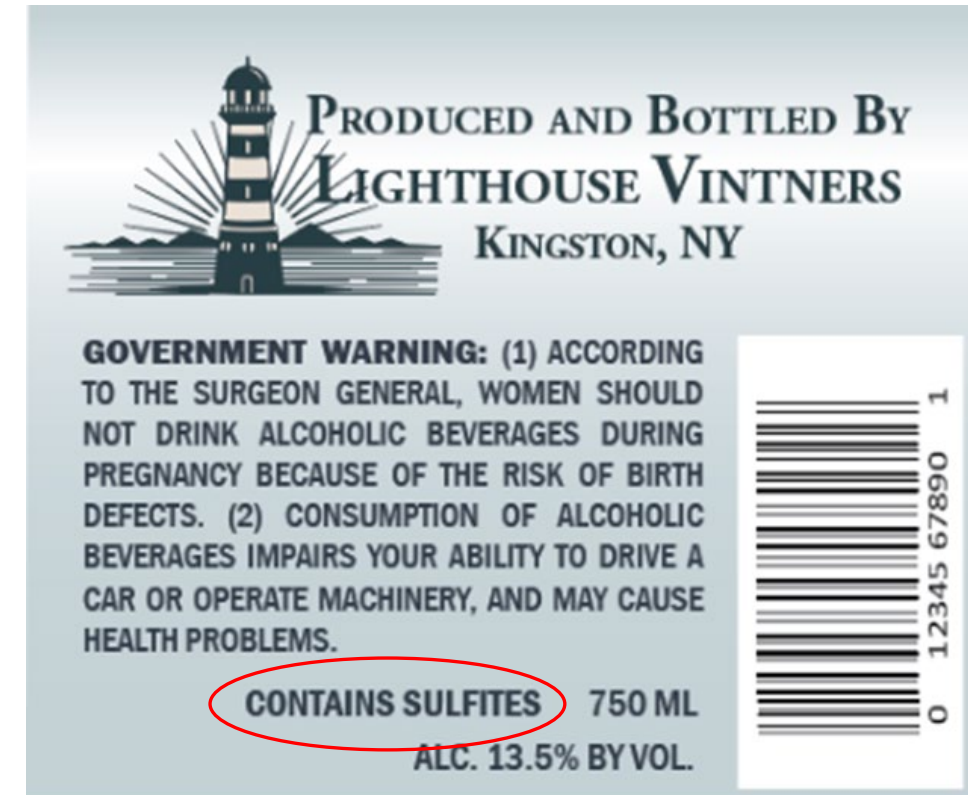
“**ABV**” is **not** allowed as an abbreviation of “**alcohol by volume**” in the mandatory alcohol content statement.

27 CFR 4.36



Any Label: Sulfite Declaration

- Must declare if 10 ppm of total sulfites or more; generally stated as **“Contains Sulfites.”**
- If less than 10 ppm, may be omitted if:
 - Obtain lab analysis from a TTB lab.
 - Submit analysis with COLA.
 - **NOTE:** TTB does not permit statements such as **“sulfite free,”** but other statements are allowed, such as “No sulfites added” (must also state “may contain naturally occurring sulfites”) or “Contains naturally occurring sulfites.”
- May appear on any label.

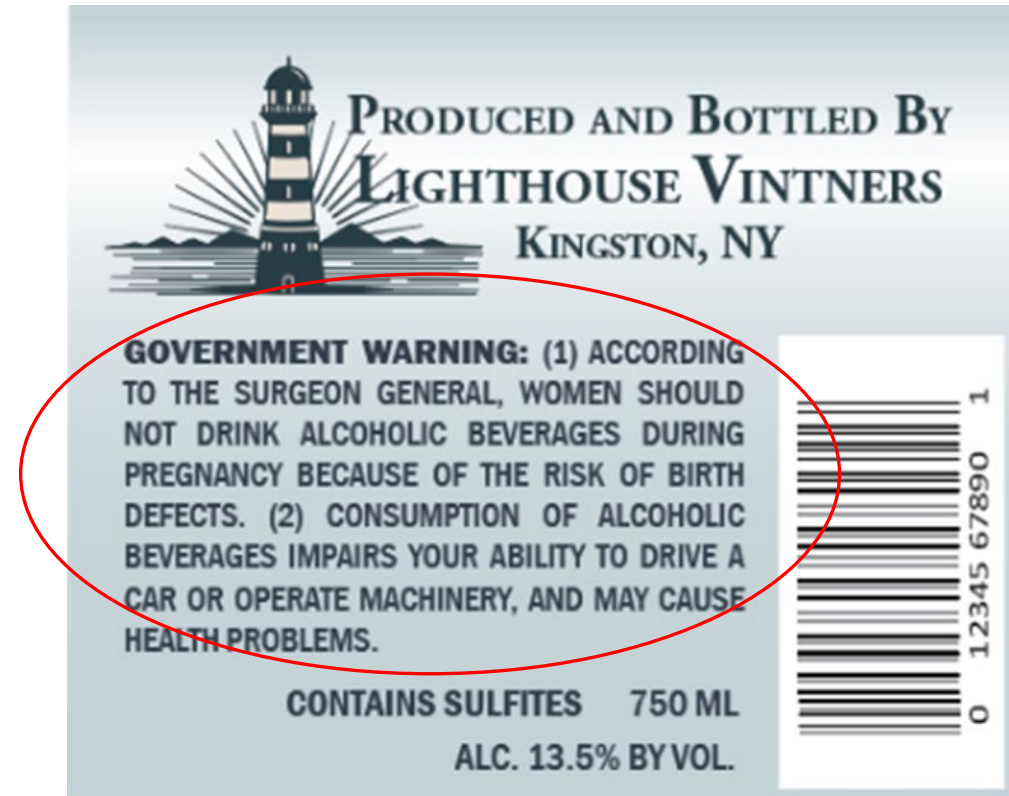


27 CFR 4.32



Any Label: Health Warning Statement

- By law, this exact statement is required to appear on all alcohol beverages **containing 0.5% or more alcohol by volume.**
- May appear on any label.



27 CFR 16.21



Any 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.

- Words “**GOVERNMENT WARNING**” must be in capital letters and bold type; remainder of statement may not appear in bold type.
- “S” in Surgeon and “G” in General must be capitalized.
- It must appear as a continuous paragraph, separate and apart from other information.

27 CFR 16.21



Any Label: Country of Origin

- U.S. Customs and Border Protection requires a statement of origin on all imported alcohol beverages.
- Acceptable formats:
 - Product of Italy
 - Produced by XYZ, Bordeaux, France
 - Made in Spain
 - Australian Wine
- Every article of foreign origin entering the United States must be legibly marked with the English name of the country of origin unless an exception from marking is provided for in the law.
- May appear on any label.

27 CFR 4.35(e)

CHATEAU SISLER	
MARGAUX	
Appellation Margaux Controllee	
Red Bordeaux Wine	
Imported by: Sisler Imports, Washington, DC	
Alc. 14% by vol	Product of France
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



Any Label: Color Ingredient Disclosure

- The presence of the following must be disclosed on the product labels:
 - Yellow #5 - 27 CFR 4.32(c)
 - Carmine - 27 CFR 4.32(d)
 - Cochineal Extract - 27 CFR 4.32(d)
- Wines that contain color additives require [formula approval](#) prior to applying for label approval and will be noted in the approved formula for the wine.
- For these products, the phrase "Contains [color additive name]" must appear on the product label.

Optional Label Claims





Optional Label Claims

- Varietal Designation
- Vintage Date
- Appellation of Origin (**sometimes mandatory**)
- Estate Bottled
- “Produced” or “Made By”
- Vineyard, Orchard, Ranch, or Farm Name
- Organic Labeling
- Gluten Content Labeling
- Nutritional Content, Serving Facts, Alcohol Facts, and Sugar Content



Varietal Labeling

- A grape variety (or several varieties) may be used as a class/type designation.
- Requires an appellation of origin to appear in direct conjunction on the brand label.
- If one grape variety is used, **at least 75%** of the wine must come from the stated variety (and appellation stated).
- If multiple grape varieties are used as class/type designation, the percentage of each must be shown.
 - If on back label, list in order of predominance if not stating percentages.
- For domestic wines, there is a list of approved variety names.

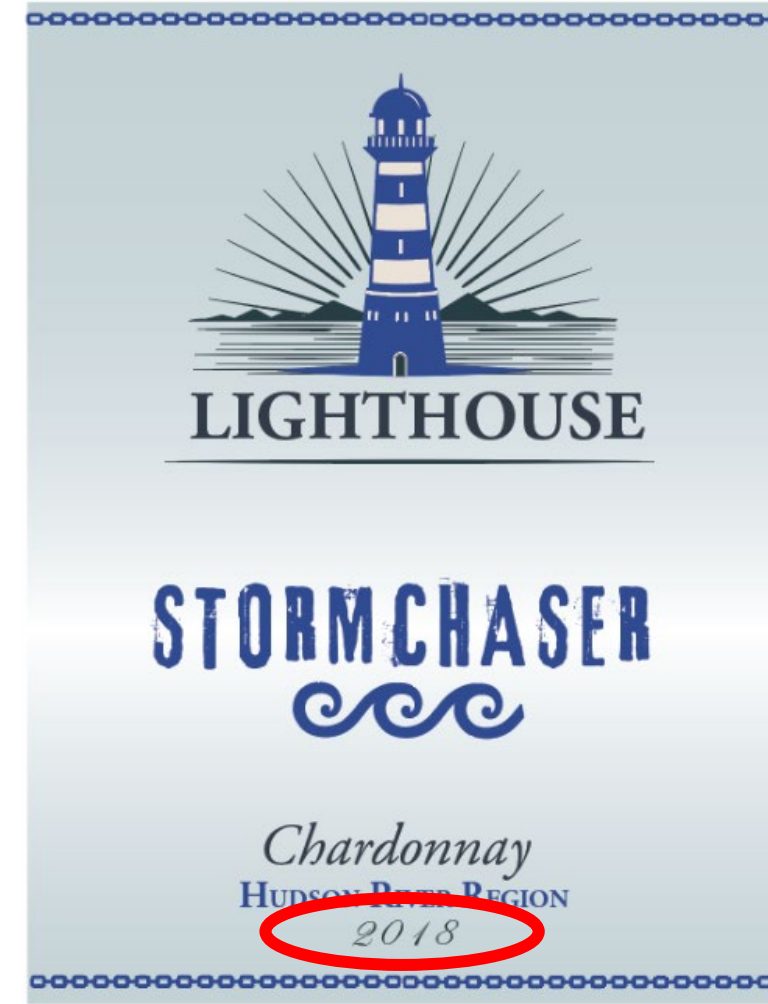
27 CFR 4.23



Vintage Date

- Year or date of harvest.
- Only **grape wine** may use a vintage date.
- Requires an **appellation of origin**
 - If labeled with an AVA or foreign equivalent, not less than **95%** of the wine must be derived from grapes grown in the vintage year.
 - For any other appellation, not less than **85%** of the wine must be derived from grapes grown in the vintage year.

27 CFR 4.27





Estate Bottled

100% of the wine came from grapes grown on land owned or controlled by the winery.

- The wine must be labeled with an AVA as appellation of origin.
- The winery that produced and bottled the wine must be located in the AVA.
- All the grapes used to make the wine must have been grown in the labeled AVA area on land owned or controlled by the winery that produced and bottled the wine.
- The winery that produced and bottled the wine must have crushed the grapes, fermented the juice resulting from the crushing, finished, aged and bottled the wine in a continuous process, the wine at no time leaving the winery's premises during the entire process.

27 CFR 4.26



Vineyard, Orchard, Farm, or Ranch Name

When used in a brand name, a vineyard, orchard, farm, or ranch name having geographical or viticultural significance is subject to the requirements of 27 CFR 4.33(b) and 4.39(i).

In general, a brand name that includes a vineyard, orchard, farm, or ranch name is acceptable:

- If not less than 95 percent of the wine was produced from primary winemaking material grown on the named vineyard, orchard, farm, or ranch;

OR

- If the company name or trade name shown in the mandatory name and address statement on the label is identical to the brand name that includes a vineyard, orchard, farm, or ranch name.



Organic Labeling

- **“100% Organic”** contains only organic ingredients and processing aids with no chemically added sulfites.
- **“Organic”** contains at least **95%** organic ingredients with no chemically added sulfites.
- **“Made with Organic [Ingredients]”** contains at least **70%** organic ingredients and may contain up to 100 ppm of sulfites from sulfur dioxide.
- Products containing less than 70% organic ingredients and products that are not processed by a certified organic handling operation may only identify each organically produced ingredient in an ingredient statement.
- Claims must be certified to USDA organic regulations
 - Accredited Certifying Agent (ACA) review
 - Crop reports

Labeling Errors Overview





Top Label Errors (2025)

1. Appellation required on brand label
2. Class/type designation is missing from the brand label
3. The appellation stated on the brand or back label is a misleading geographical reference
4. Use of varietal or vintage requires appellation
5. The Government Warning statement has punctuation errors or the words “Government Warning” do not appear in bold



Top Label Errors (2025)

6. Formula and label contain conflicting information
7. Name/address –company name or DBA name is in conflict with the name in the bottler/ importer statement
8. Alcohol content in the wrong format
9. Class/type conflict
10. Varietal on label but not application

COLA Information





What is a Certificate of Label Approval?

- A Certificate of Label Approval (COLA) authorizes the use of a label in interstate or foreign commerce.
- A COLA is required for each product sold in interstate commerce (product = distinct brand/distinct product designation/distinct label).
- A COLA is not required for wine containing less than 7% alcohol by volume.

27 CFR 4.50(a)



What is a Certificate of Exemption From Label Approval?

- Domestic wines that will only be sold in the state of bottling may instead be covered by a certificate of exemption from label approval.
 - The label must bear the statement, “For sale in (name of state where bottled) only”
- Signifies that the wine is exempt from the FAA Act labeling rules in part 4.
- Issued under the condition that the product will under no circumstances be introduced into interstate or foreign commerce.
- Applications for exemption from label approval follow the same process as applications for COLAs.

27 CFR 4.50(b)



Who Applies and When?

Domestic Wines:

- The **bottler** must apply for label approval or exemption from approval.
- Must obtain COLA (or exemption) prior to bottling.
- Labels must be affixed prior to removal from bonded wine premises.

Imported Wines:

- The **importer** must apply for label approval.
- Must obtain label approval prior to removal of wine from U.S. Customs and Border Protection custody.*

* A COLA should be obtained well in advance to avoid port cost



How Do I Apply?

COLAs Online

- Step-by-step guidance.
- Validation checks along the way.
- Application status updates via email.



[COLAs Online Customer Page](#)

See webinar presentation for information on how to register for an account: [COLAs Online Workshop](#).



Tips for Speedy Label Approval

- Determine if you need formula approval prior to submitting your COLA (see [Which Alcohol Beverages Require Formula Approval?](#)).
- Be sure to accurately enter the brand name or fanciful name as it appears on label.
- Follow the instructions for each field, e.g., do not enter the class/type designation in the brand name or fanciful name field.
- Review your labels to ensure they are not skewed or distorted. They need to accurately depict what the label will look like.



COLAs Online: Conditionally Approved

- TTB may propose changes to the information you entered in the application to make it match the label you submitted.
- After the proposed changes are entered into COLAs Online, the status is **Conditionally Approved**.
- You must review proposed changes, and then either:
 - Accept for immediate approval of COLA **or**
 - Decline and make necessary changes before returning.
- Which application fields are involved?
 - Brand name
 - Fanciful name
 - Grape Varietal
 - Wine Appellation
- **Conditionally Approved** is not a final status, it **requires** action on your part to be approved.



Can I Change My Approved Label Without Getting a New COLA?

- Yes, once a label receives TTB approval, you can make certain changes (listed at the bottom of [TTB Form 5100.31](#)) to that label without obtaining a new COLA.
- Any revisions you make to your approved labels must be in compliance with the applicable regulations.

Allowable Revisions to Approved Labels





Allowable Revisions: Commonly Used

- Deleting non-mandatory information
- Repositioning **label information (e.g., graphics)**
- Change color/font
- Percentage of blend
- Change or remove vintage date
- Change name or trade name to reflect another name listed on your permit
- Change “Produced” to “Vinted” or “Cellared” (*cannot be used in reverse*)
- Change net contents
- Change alcohol content
- Acid/PH/Sugar
- Add or delete ageing time
- Change bottle date
- Change analysis
- Add or change bottle deposit information
- Add, delete, or change web site address, phone # or zip code
- Add, delete, or change holiday or seasonal themed graphics
- Add, delete, or change sustainable farming, environmental, and eco-friendly claims
- Add, delete or change social media icons
- Color change to picture



Allowable Revisions: Example

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





Allowable Revisions: Example

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



Allowable Revisions: Example

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

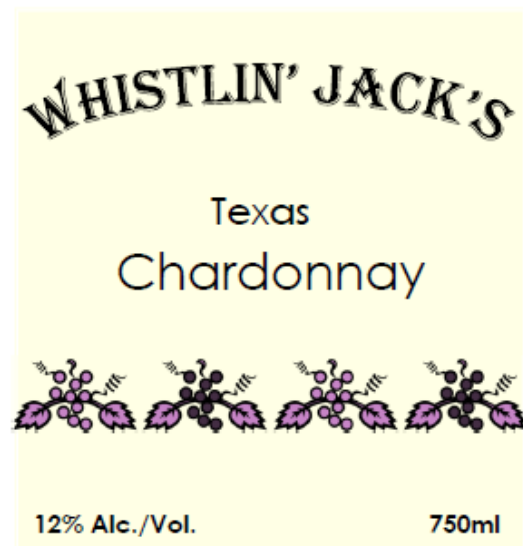




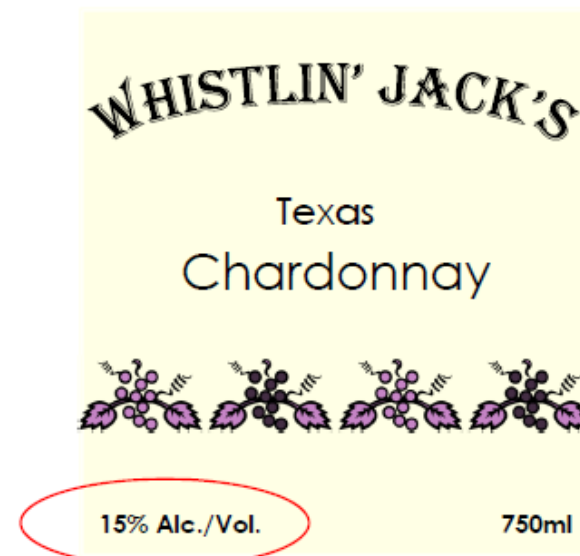
Allowable Revisions: Example

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





Examples of Changes that CANNOT be Made

A new COLA is required if you:

- Change the class/type.
- Change the brand name.
- Add any graphics that are not specifically authorized.
- Add or change wording that is not specifically authorized.

Wine Labeling Resources





TTB Wine Contacts

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 6 – Wine Questions
- Online: <https://www.ttb.gov/contact-alfd>



TTB.gov Resources

Checklist of Mandatory Label Information - Wine

<https://www.ttb.gov/images/wine-label/wine-labeling-checklist.pdf>

Wine Resources

<https://www.ttb.gov/regulated-commodities/beverage-alcohol/wine>

Boot Camp for Wineries

<https://www.ttb.gov/public-information/news/ttb-boot-camp-webinar-series#wine>



Wine Labeling Web Pages

TTB wine labeling guidance on TTB.gov provides information in a user-friendly centralized location:

<https://www.ttb.gov/wine/labeling>

Some key topics are:

- Getting started with wine labeling (sample labels).
- [Anatomy of Wine Label Tool](#)
- Mandatory Wine Label Information ([Mandatory Information Checklist](#)).
- Optional Wine Label Information (American Viticultural Areas, Organic Claims).