

ALFD'S

SAMPLE

WINE LABELS

A BIT BEYOND THE BASICS

Have you already read the wine labeling regulations in 27 CFR § 4 and the Health Warning regulations in 27 CFR § 16 but are still not confident that your label design will receive a Certificate of Label Approval? Have you reviewed the Federal Alcohol Administration Act but been left wanting? Then this booklet is for you! The Advertising, Labeling and Formulation Division created this to provide examples of approvable wine labels along with additional comments to further explain some aspects of the labeling rules.

To maximize the usefulness of this guide, all of the pages and comments should be reviewed. Every label is unique and certain information on a label may trigger other labeling requirements. TTB regulations are quite detailed in regard to the production of a wine and the information appearing on the label. We have assembled some samples in this handout that may prove useful, but are not all-encompassing.

SAMPLE GENERIC 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 words "Table Wine" are present on the label, the alcohol content need not be specifically shown on the label as long as the alcohol content of the product is between 7 and 14 percent by volume (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 prior to bottling the wine. In some cases, the winery may then obtain a new certificate of label approval 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 as outlined in 27 CFR 24.308.

SAMPLE GENERIC 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)).

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, so it could be stated on the label in place of “Red Wine” (27 CFR 4.21(a)(3)). Unlike “Table Wine”, the designation “Dessert Wine” does not substitute as an alcohol content statement. A specific alcohol content statement 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 certificate of label approval prior to bottling the wine. In some cases, the winery may then obtain a new certificate of label approval 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 as outlined in 27 CFR 24.308.

SAMPLE STANDARD ONE-PIECE WINE BRAND LABEL

ABC WINERY
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. CONTAINS SULFITES

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)).

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

SAMPLE STANDARD TWO-PIECE WINE LABEL

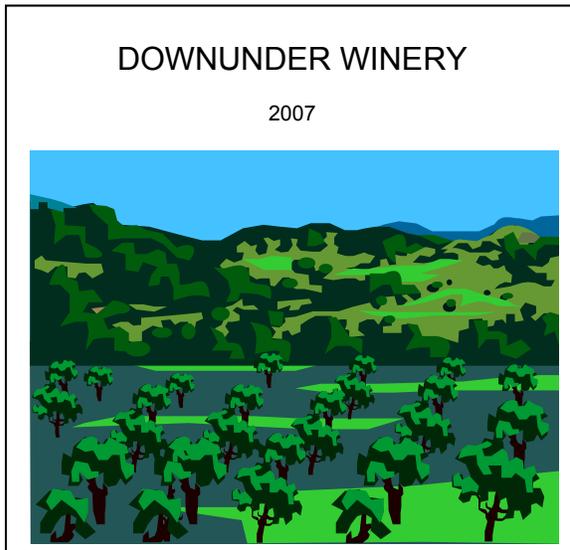
<p>ABC WINERY</p> <p>2008</p> <p><i>Fanciful Name Rose</i></p> <p>ZZZ COUNTY</p> <p>ROSE WINE</p> <p>ALC. 12.5% BY VOL.</p>	<p>BOTTLED BY ABC WINERY, CITY, STATE</p> <p>CONTAINS SULFITES</p> <p>750 ML</p> <p>GOVERNMENT WARNING: (1) ACCORDING TO THE SURGEON GENERAL, WOMEN SHOULD NOT DRINK ALCOHOLIC BEVERAGES 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 ↑

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" must be followed by "Wine" in order for it 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 must be shown on the brand label (27 CFR 4.27(a)).

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 ↓

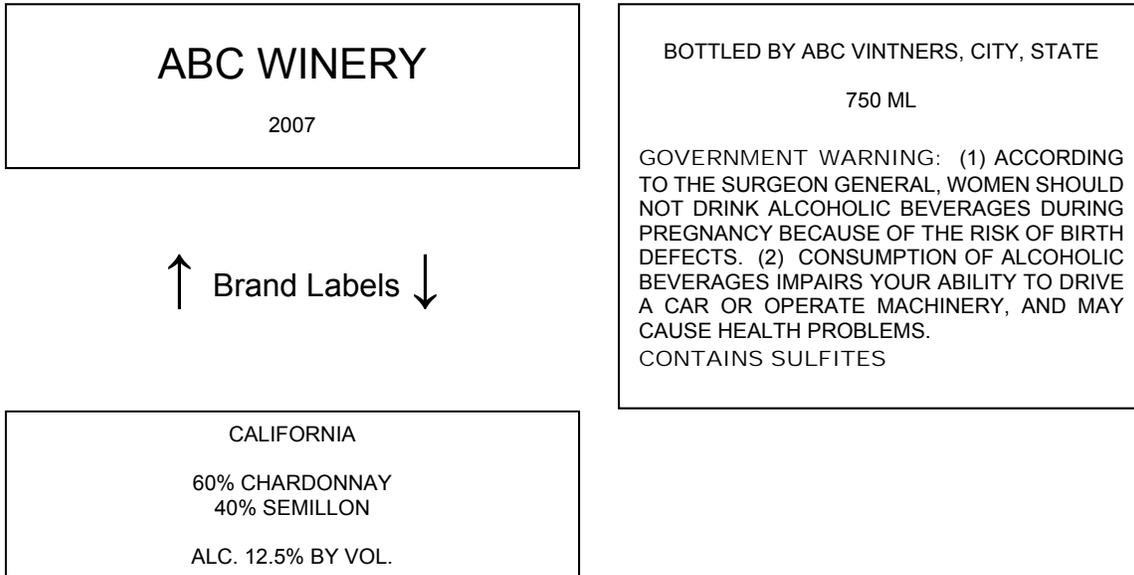
RED WINE	VICTORIA	12% ALC./VOL.
IMPORTED BY OZ IMPORTS, CITY, STATE		
PRODUCT OF AUSTRALIA		750 ML

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 that must appear on the brand label (such as the designation “red wine” and the alcohol content statement). (27 CFR 4.32(a).)

An appellation of origin is required on this label because of the presence of a vintage date (27 CFR 4.27). 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”), which means that they *must appear on the same label* (27 CFR 4.34(a)).

In this example “Downunder Winery” or “Oz Imports” may serve as the brand name for the label (27 CFR 4.33(a)). “Product of Australia” serves as the country of origin statement in accordance with Customs and Border Protection regulations at 19 CFR Part 134.

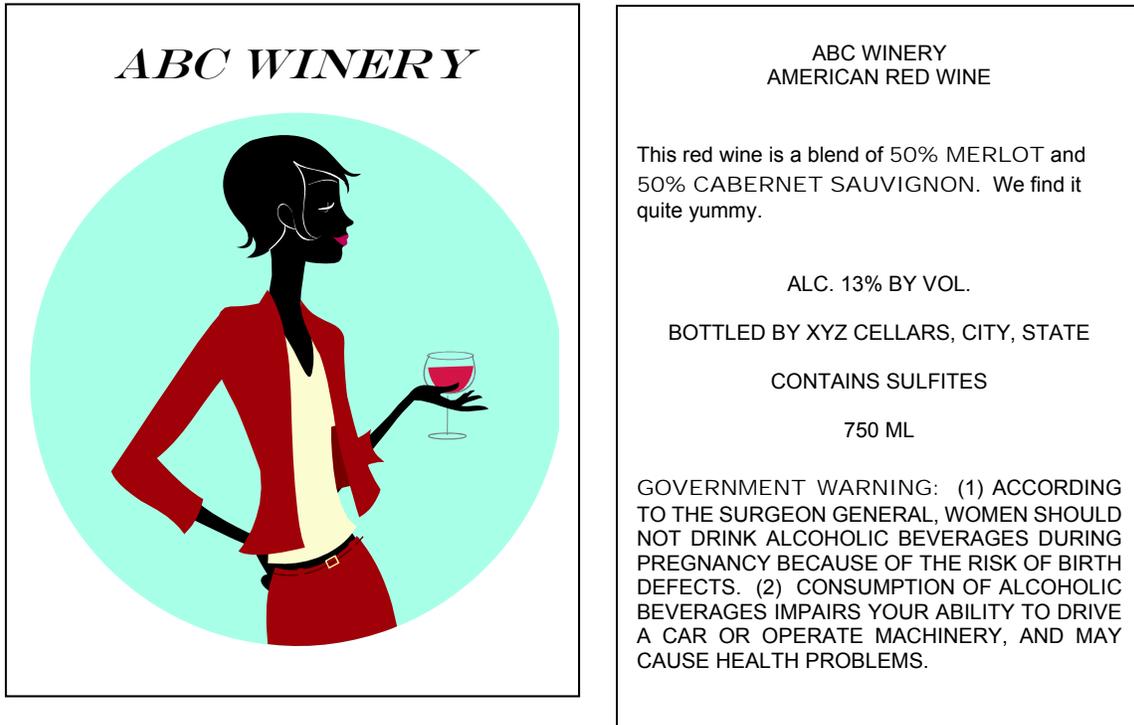
SAMPLE DOMESTIC THREE-PIECE WINE LABEL



When designing two-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”) and *the class and type designation* (in this case, the varietals and their percentages) *must appear on the same label*. The brand name is “ABC Winery” (27 CFR 4.33(a)).

NOTE: When multiple varietals are shown on a brand label, 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

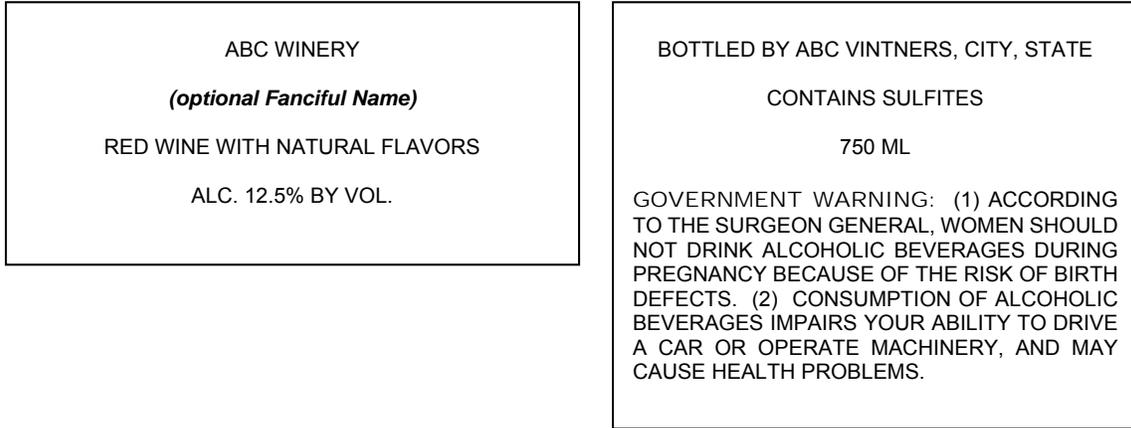


↑ Brand Label ↑

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

For instance, brand-label varietal references take precedence as the class and type designation. 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 appear separate and apart or more conspicuous than surrounding text. If the mandatory information appears surrounded by other text, it must be in bold print or at least twice the size of the surrounding text (27 CFR 4.38(b)).

“NON-STANDARD WINE” LABEL



↑ Brand Label ↑

These labels contain all of the mandatory information for other than standard wines which must have a Formula (domestic) or Pre-Import product evaluation (imported) approved prior to the submission of the label. The Formula/Pre-Import evaluation, when approved, will include a suggested statement of composition (e.g. “Grape wine with natural flavors added”) which is considered the mandatory class and type designation and must appear on the brand label.

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

Also keep in mind that vintage dates and grape varietals are not permitted on these wines (27 CFR 4.27(a), 4.39(n)).