

LABELING ORGANIC WINE

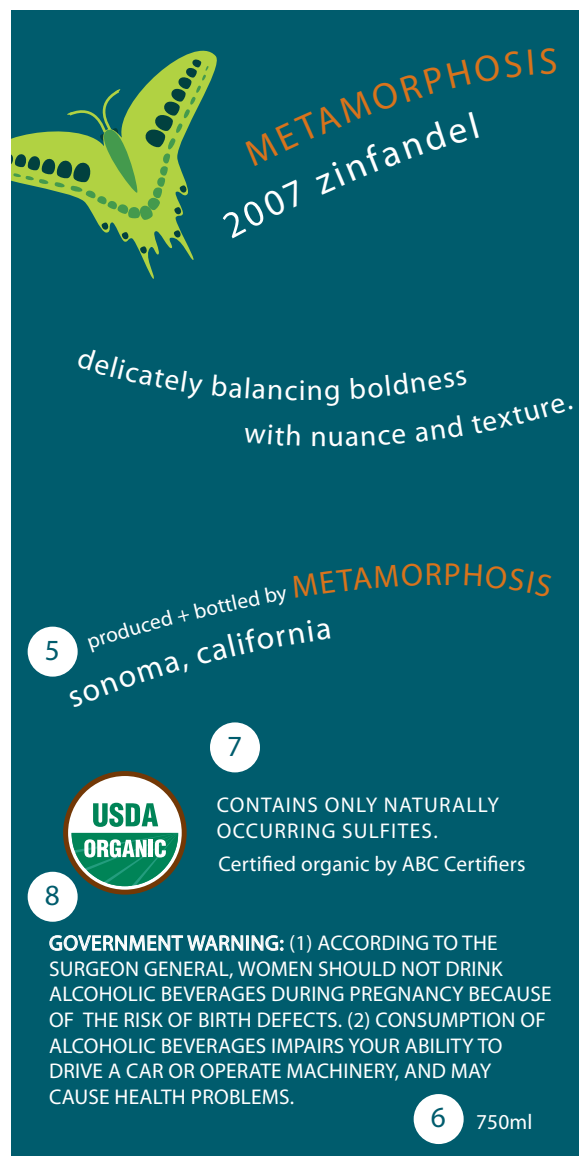
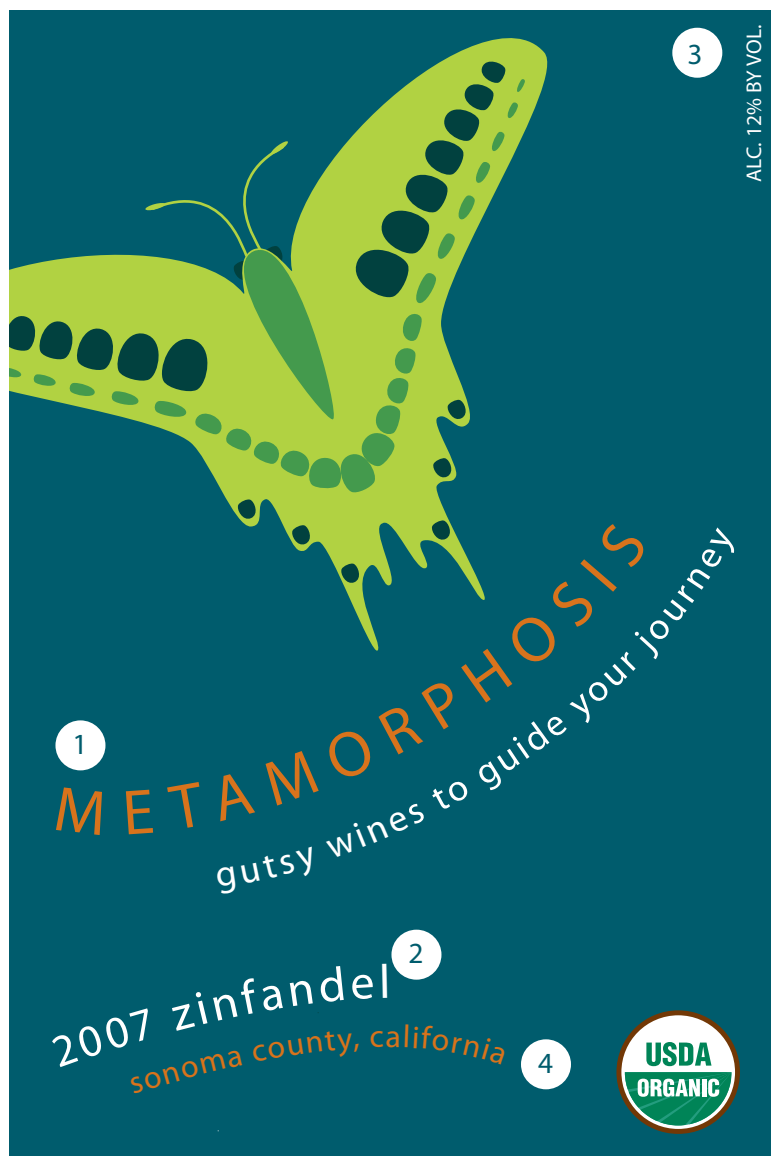


All organic alcohol beverages must meet both Alcohol and Tobacco Tax and Trade Bureau (TTB) and USDA organic regulations. TTB requires that alcohol beverage labels be reviewed through the Certificate of Label Approval (COLA) application process. Learn more at <http://www.ttb.gov/wine>. Organic-specific labeling requirements will be described in the subsequent pages.

Required Elements of a Wine Label

- | | |
|---|------------------------------|
| 1 Brand name | 5 Bottler's name and address |
| 2 Class/type (such as red wine or grape varietal) | 6 Net contents |
| 3 Alcohol content | 7 Sulfite declaration |
| 4 Appellation (required in most cases). | 8 Health warning statement |

For specific requirements related to each of these elements, other requirements, and information on labeling imported products, visit www.ttb.gov.





Requirements for wine making organic claims. In addition to TTB requirements, the USDA organic regulations describe the specific production and handling requirements for the three main categories of organic labeling claims. For each category (described on subsequent pages), these regulations dictate the wine's composition, as well as how and when wine labels may make organic claims.

Organic oversight. The USDA authorizes third-party accredited certifying agents (ACAs) to assess organic operations' compliance with the USDA organic regulations. The table below outlines some of the key requirements for each labeling category (learn more at www.ams.usda.gov/nop):

	"Organic"	"Made with Organic Grapes"	Other
Overseen by certifier/ACA?	Yes	Yes	No*
USDA organic seal or foreign equivalent allowed?	Yes	No	No
Organic claims allowed in addition to ingredient statement?	Yes	Yes	No
Added sulfites allowed?	No, only naturally occurring** (less than 10 parts per million (ppm))	Yes, sulfur dioxide only up to 100 ppm. Added sulfites must be disclosed on the label	Yes
Non-organic grapes allowed?	No	No	Yes
Ingredients produced using prohibited methods (such as genetic engineering) allowed?	No	No	Yes

*For wine not in the "organic" or "made with organic grapes" labeling categories ONLY: COLA application must include organic certificates ("crop reports") for any specific ingredients identified as "organic" on the label.

**Any statement that indicates a wine contains only naturally occurring sulfites requires a lab analysis.

Certifier/ACA + COLA review. To ensure compliance with both TTB and USDA organic regulations, a certified operation's alcohol labels must be approved through the following steps prior to sale of the organic alcohol product:

1. Certifier/ACA reviews the alcohol label(s) to assess compliance with USDA organic regulations.
2. Certifier/ACA stamps/signs label(s), verifying compliance with USDA organic regulations.
3. TTB permittee (importer or organic operation, such as a bottler) completes the COLA application.
4. TTB permittee submits COLA application and label(s) approved by the certifier/ACA to TTB.
No longer requires a copy of the organic certificate. <http://bit.ly/ttb-documentation>

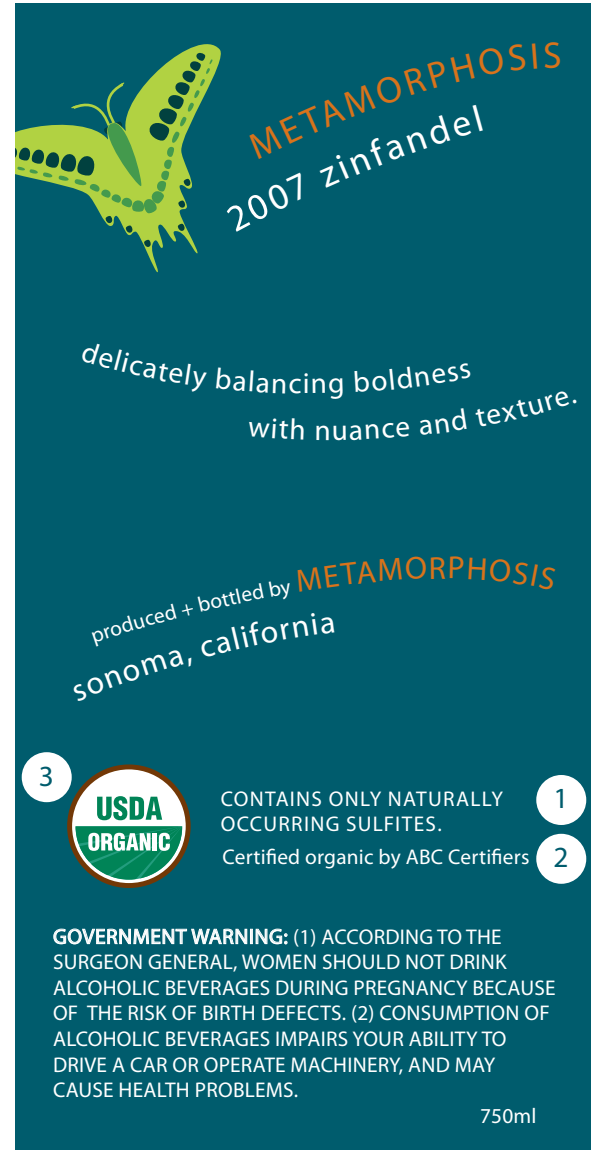
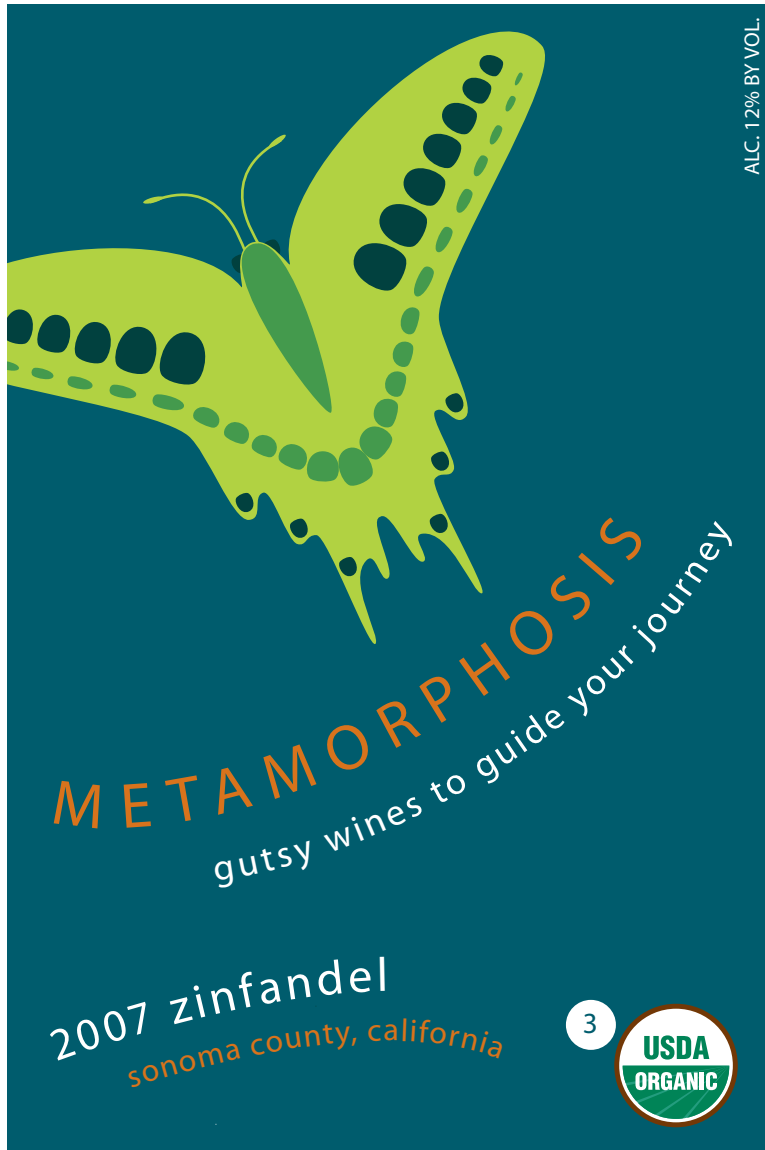
Trade considerations. USDA has trade partnerships with multiple countries. These partnerships allow organic products certified in one country to be sold as organic in the other. Regardless of country of origin, traded products must meet the labeling requirements in the destination country and any other terms of the arrangement. Therefore, a wine produced and sold in a foreign country typically has a separate label if it is also imported to the United States. To learn more about specific trade partnerships, visit www.ams.usda.gov/NOPInternationalAgreements.



Labeling Category: "Organic"

Wine in the "organic" labeling category must be overseen by a certifier/ACA, who will verify that the wine meets all appropriate specifications in the USDA organic regulations, such as (see acceptable label for "organic" wine below):

- Yeast must be certified organic unless the desired strain isn't available in organic form.
- All agricultural ingredients (such as grapes) must be certified organic except per the National List of Allowed and Prohibited Substances (National List).
- Added sulfites are prohibited.
- Non-agricultural ingredients must be specifically allowed on the National List and may not exceed a combined 5 percent of the total product (excluding salt and water).

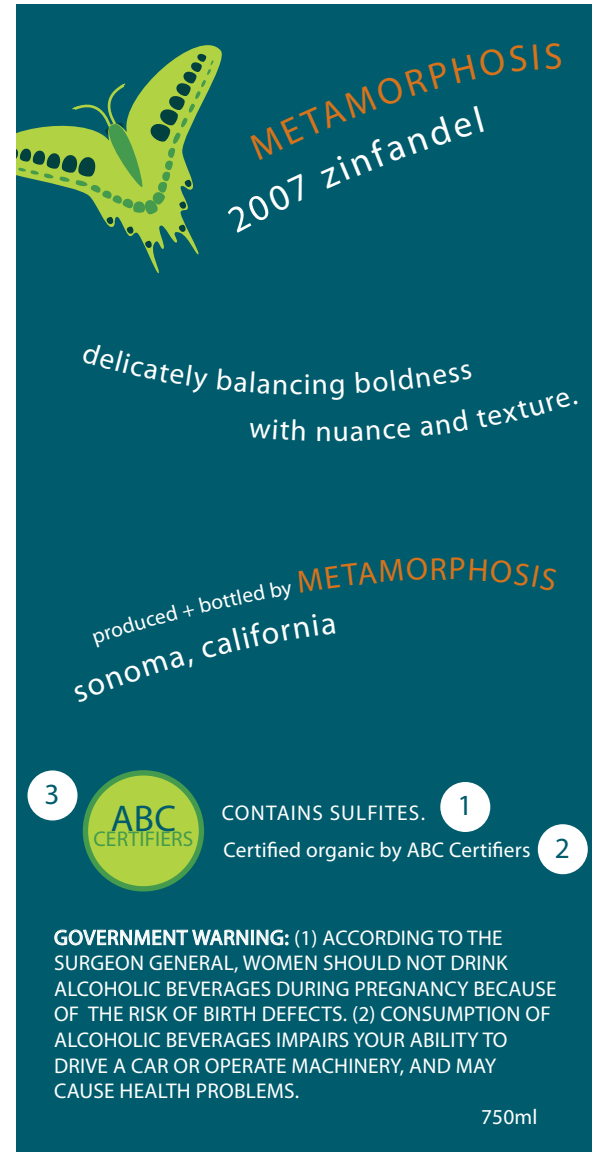


Why the label is acceptable

1. The certifier/ACA has confirmed that sulfites weren't added to the wine (sulfite statement is optional).
2. The certifier/ACA is listed below the handler, bottler, or distributor (certified organic by ***).
3. For "organic" wine, the USDA organic seal (or foreign equivalent if authorized under an equivalency arrangement with the United States) may be used anywhere on the label.

Labeling Category: “Made With” Organic Grapes

Wine in the “made with” labeling category must be overseen by a certifier/ACA, who will verify that the wine meets all appropriate specifications in the USDA organic regulations. Unlike “organic” wine, wine “made with organic grapes” may contain up to 100 ppm of sulfur dioxide. All grapes must be certified organic, but other agricultural ingredients (such as yeast) are not required to be organic. Non-agricultural ingredients must be specifically allowed on the National List. Below is an example of an acceptable label for a “made with organic grapes” wine:



Why the label is acceptable

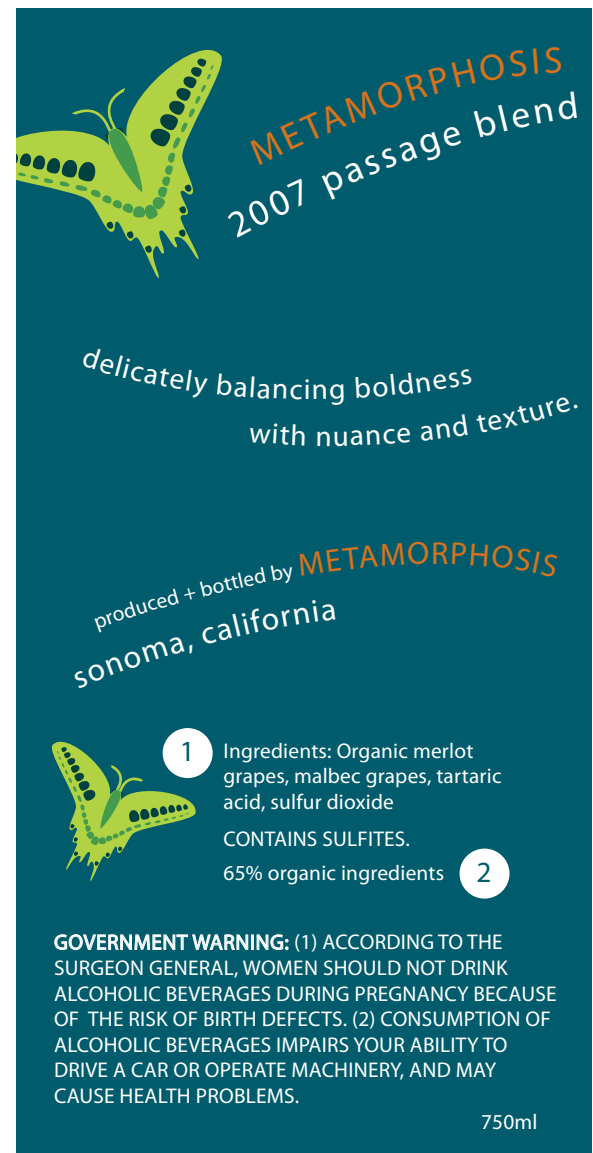
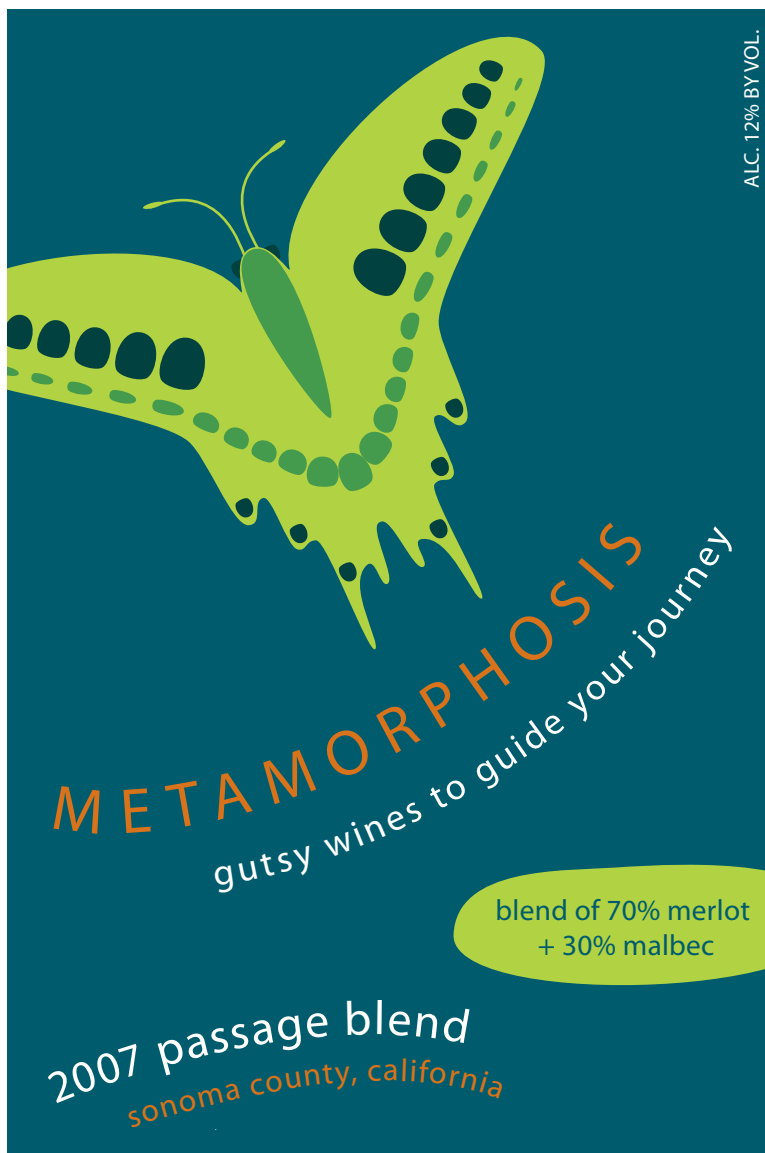
1. A certifier/ACA verified that the finished product contains less than 100 ppm of sulfur dioxide (other types of sulfites, such as potassium metabisulfite, are prohibited). The sulfite statement (“contains sulfites”) is present.
2. The certifier/ACA is listed below the handler, bottler, or distributor (certified organic by ***).
3. The USDA organic seal (or foreign equivalent) isn’t on the label. The certifier/ACA’s logo may be anywhere.
4. All words in the claim, “made with organic grapes,” are formatted the same (and no more than half the size of the largest text on the label). Since “made with organic grapes,” is stated on the label, it can also state the percentage of certified organic content.

Labeling Category: Not “Organic” or “Made With Organic Grapes”

If a wine doesn't meet the requirements of the “organic” or “made with organic grapes” labeling categories, it isn't eligible for organic certification. These wines' COLA applications must include an organic certificate (“crop report”) for each ingredient identified as “organic” on the label. Examples of attributes that would disqualify wine from certification:

- Wine contains organic and non-organic grapes
- Sulfite levels exceed 100 ppm of sulfur dioxide
- An ingredient was produced through genetic engineering or other prohibited methods

Uncertified wine labels must not use the USDA organic seal (or foreign equivalent) anywhere on the label. The ingredient statement can identify any certified organic ingredients as organic; if the ingredient statement is present, the label may also state the percentage of certified organic ingredients. All other organic claims are prohibited. Below is an example of an acceptable wine label in this category:



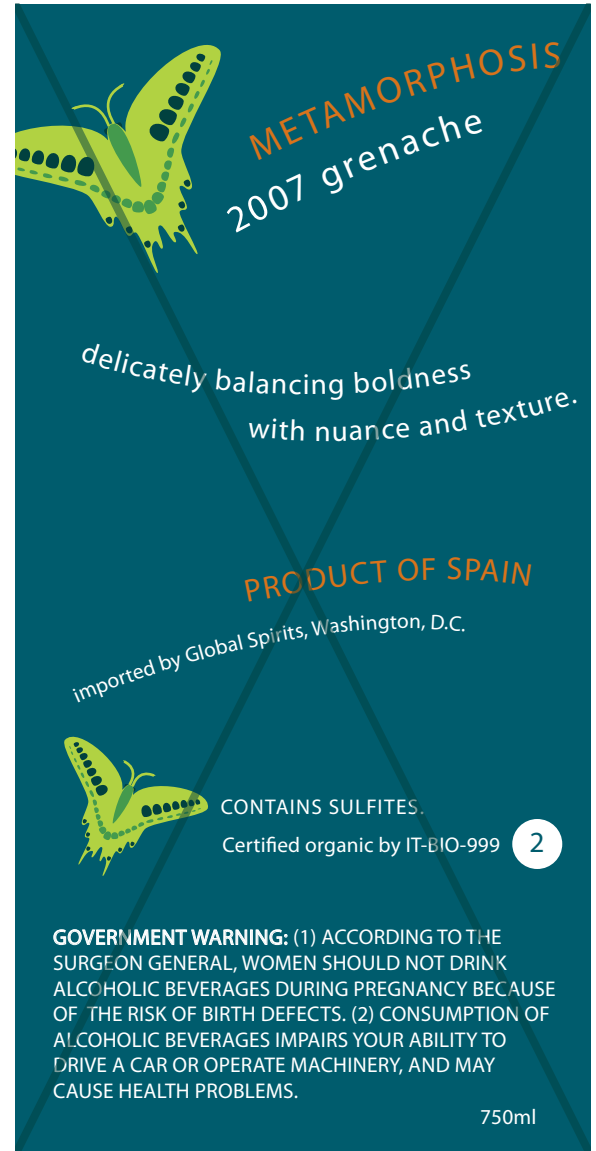
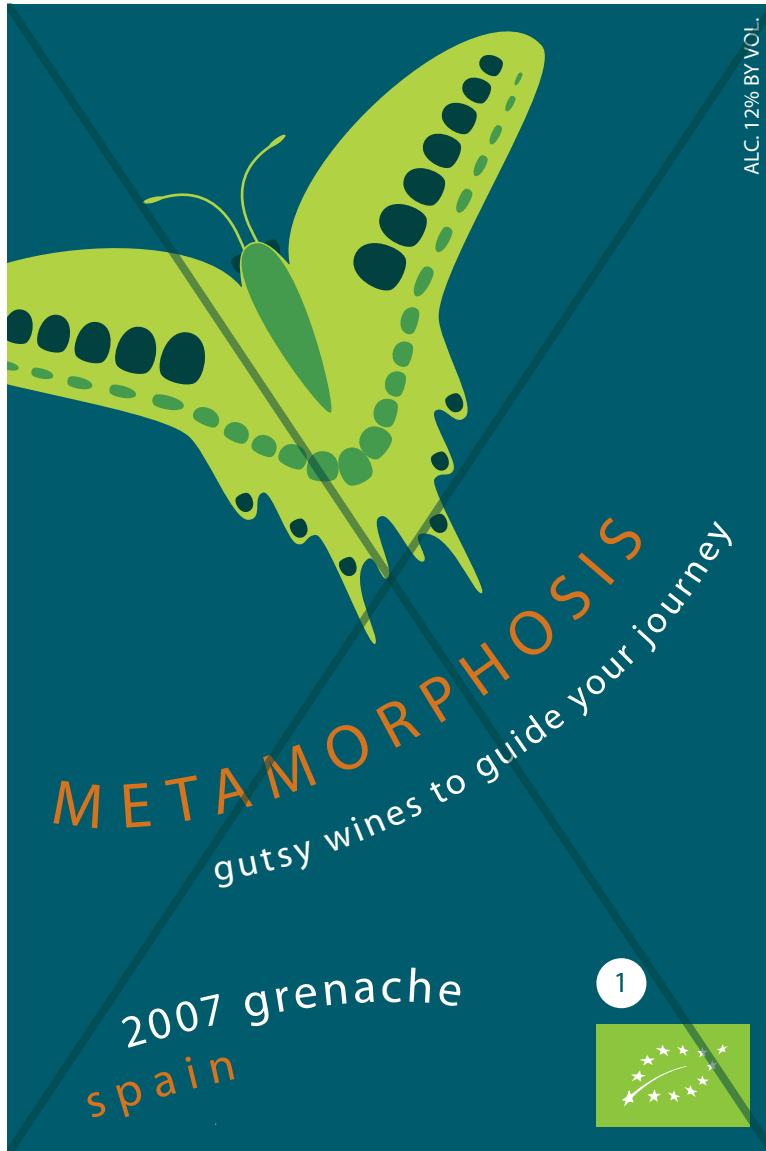
Why the label is acceptable

1. The USDA organic seal isn't present on the label, and organic claims are limited to the ingredient statement.
2. Since the voluntary ingredient statement is present, the percentage of organic ingredients claim is acceptable.

To increase labeling compliance, here are examples of two unacceptable labels we've seen and how to correct them.

Unacceptable Labels: Example 1

A certifier/ACA confirms this wine contains water, organic grenache grapes (99%), yeast (0.5%), sulfur dioxide (0.3%), and tartaric acid made from grape wine (0.2%).



Why is the label unacceptable?

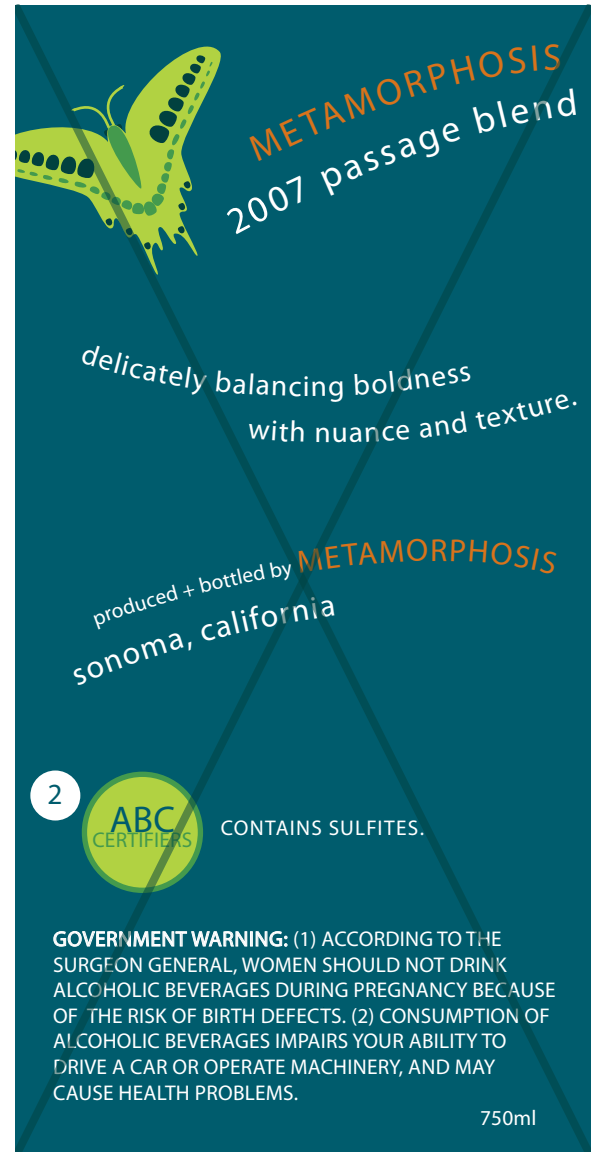
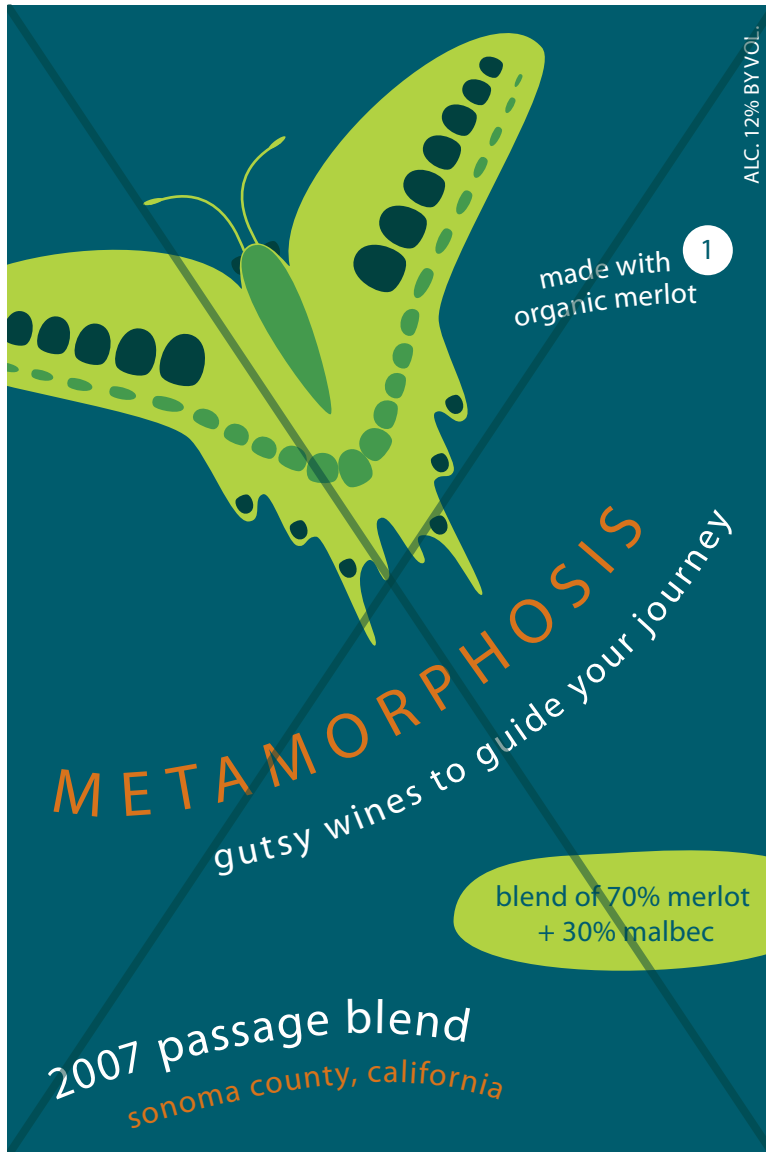
1. Since the wine contains added sulfites (more than 10 ppm), it isn't eligible for the "organic" labeling category. It therefore can't be labeled with the European Union (or USDA organic) seal.
2. The certifier/ACA's full name isn't included.

How can I correct it?

1. Remove the European Union organic logo (it can't be used anywhere on the label). You may add, "made with organic grapes" and/or include the certifier/ACA's seal anywhere on the label (see page 4).
2. Spell out the certifier/ACA's full name ("certified organic by ***"), not just the code assigned by the European Union.

Unacceptable Labels: Example 2

Testing confirms this wine contains water, organic merlot grapes (69.5%), malbec grapes (29.5%), yeast (0.5%), sulfur dioxide (0.3%), and tartaric acid made from grape wine (0.2%).



Why is the label unacceptable?

1. This wine contains a mixture of organic merlot and non-organic malbec grapes. It is therefore not eligible for organic certification and can only make organic claims in the ingredient statement (see page 5).
2. A certifier/ACA's seal is on the label (product isn't eligible for organic certification).

How can I correct it?

1. Remove the "made with organic merlot" statement.
2. Remove the "ABC Certifiers" logo.

If the label includes an optional ingredient statement, it can also state, "contains 65 percent organic ingredients" below the ingredient statement.