

CHECKLIST OF MANDATORY LABEL INFORMATION | DISTILLED SPIRITS

This guidance lists the mandatory information that TTB reviews on every distilled spirits label and certificate of label approval application and includes a checklist to help prevent common errors. This document does not provide comprehensive labeling guidance. Distilled spirits for which a certificate of label approval is required must be labeled in compliance with **all** applicable requirements in 27 CFR part 5 and 27 CFR part 16.

Mandatory Information that Must Appear in the Same Field of Vision

A label or labels bearing the brand name, alcohol content, and class/type designation must appear in the same field of vision. The same field of vision means a single side of a container (for a cylindrical container, a side is 40 percent of the circumference) where all of the pieces of information can be viewed simultaneously without the need to turn the container. (See full definition in 27 CFR 5.63.)

Mandatory Item and Description	Regulatory Citation	Checklist
Brand Name Name under which the product will be sold.	27 CFR 5.64	<input type="checkbox"/> Does the brand name appear in the same field of vision with the alcohol content and the class and type designation? <input type="checkbox"/> Does it match the entry in the “Brand Name” field on the application?
Designation: Class/Type Designation Examples: “Vodka,” “Chocolate Flavored Brandy,” “Imitation Liqueur”; OR Designated in Accordance with Trade/Consumer Understanding: Example: “Ouzo”; OR Distinctive/Fanciful Name Together with Statement of Composition A distinctive or fanciful name, together with a truthful and adequate statement of the composition of the product.	27 CFR 5.165 27 CFR 5.141	<input type="checkbox"/> Does the designation appear in the same field of vision with the brand name and alcohol content?? <input type="checkbox"/> If the designation is a class or type, is it consistent with a class and type listed in the regulations? <input type="checkbox"/> Is the designation separate and apart from all other information? <input type="checkbox"/> Is it spelled correctly? <input type="checkbox"/> Is this a product that requires a formula? (Check distilled spirits formula requirements here .) <input type="checkbox"/> If yes, is any required statement of composition either the same as (or more specific than) the general suggested statement on the approved formula (under Determination and Labeling Instructions)? <input type="checkbox"/> Has the approved formula number been selected on the application? <input type="checkbox"/> Are this and other labels on the container free from conflicting or inconsistent designations? (e.g., “vodka with natural flavors” vs. “vodka”)
Alcohol Content Example: “Alcohol ___ % by volume”	27 CFR 5.65	<input type="checkbox"/> Is the alcohol content stated in the same field of vision with the brand name and the class and type designation?? <input type="checkbox"/> Are the format and abbreviations acceptable? You may use: “Alc.,” “Alc”, “Vol.,” “Vol”, or “%”. Note: The label may state the alcohol content in degrees of proof but this statement must be adequately distinguished from the mandatory statement of alcohol content as a percentage by volume (for example, it may appear in parentheses or brackets), and as long as it appears in the same field of vision as the mandatory statement of alcohol content as a percentage of alcohol by volume.

Mandatory information that may appear on ANY Label

Mandatory Item and Description	Regulatory Citation	Checklist
Net Contents Volume of distilled spirits in container.	27 CFR 5.70 27 CFR 5.203	<input type="checkbox"/> Is the net contents statement present on the label, or is it blown into or otherwise marked on the container? <input type="checkbox"/> Are the format and abbreviations acceptable (e.g. 500 mL or 1.5 L)?

		<input type="checkbox"/> Does it meet an approved standard of fill? In general, metric standards of fill must be used.
Name and Address The name (or trade name) and address (city and state) as listed on your permit.	27 CFR 5.66 27 CFR 5.67 27 CFR 5.68	<input type="checkbox"/> Is the name and address on the label? <input type="checkbox"/> Does the name and address immediately follow a phrase such as "Bottled By" or "Imported By", respectively, with no intervening text? (For other phrases that may be used, see 27 CFR 5.66.)
Mandatory information that may appear on ANY label (continued)		
Mandatory Item and Description	Regulatory Citation	Checklist
Health Warning Statement Statement must appear exactly as prescribed in the regulations.	27 CFR Part 16	<input type="checkbox"/> Is the statement on the label? <input type="checkbox"/> Does it match the exact wording and punctuation? <input type="checkbox"/> Are the words " GOVERNMENT WARNING " in capital letters and bold type? <input type="checkbox"/> Are the "S" in Surgeon and "G" in General capitalized? <input type="checkbox"/> Does it appear as one statement? <input type="checkbox"/> Is it separate and apart from other information on the label?
Country of Origin Imported distilled spirits only. Required by U.S. Customs and Border Protection (CBP).	19 CFR 134.11 27 CFR 5.69	<input type="checkbox"/> Is the country of origin statement on the label? <input type="checkbox"/> Does the country of origin statement comply with CBP regulations? NOTE: Questions about the appropriate country of origin should be directed to CBP.
Sulfite Declaration Example: "Contains Sulfites"	27 CFR 5.63(c)(7)	Required if the product has 10 ppm or more (total) sulfur dioxide. <input type="checkbox"/> Is a sulfite declaration required on the label?
Presence of Coloring Materials Example: "Colored With Caramel"; or "Artificially Colored"	27 CFR 5.63(c)(6)	Required when certain coloring materials have been used. <input type="checkbox"/> Does the label state the specific coloring material, "artificially colored," or "certified color added," as appropriate, as part of a statement of composition or a separate disclosure? See below for Yellow #5, Cochineal Extract, or Carmine.
FD&C Yellow #5 Example: "Contains FD&C Yellow #5"	27 CFR 5.63(c)(5)	Mandatory ONLY if FD&C Yellow #5 is used in the distilled spirit – this coloring material must be specifically disclosed. <input type="checkbox"/> Is the specific disclosure statement on the label, either as part of a statement of composition or a separate disclosure?
Cochineal Extract or Carmine Example: "Contains Carmine."	27 CFR 5.63(c)(6)	Mandatory ONLY if cochineal extract or carmine is used in the distilled spirit – these coloring materials must be specifically disclosed. <input type="checkbox"/> Is the specific disclosure statement on the label, either as part of a statement of composition or a separate disclosure?
Treatment with Wood	27 CFR 5.73	Required for whisky and brandy treated with wood other than through contact with oak containers, except for brandy treated with an infusion of oak chips that are harmless coloring, flavoring, or blending materials and do not exceed 2.5% by volume of the finished brandy. <input type="checkbox"/> Does the label state "Colored and flavored with wood ____" (chips, slabs, extracts, as appropriate)?

<p>Commodity Statements (Presence of Neutral Spirits)</p> <p>Example: “50% Neutral Spirits Distilled From Corn”</p>	<p>27 CFR 5.71</p>	<p>For distilled spirits (other than cordials, liqueurs, and specialties) produced by blending or rectification, if neutral spirits have been used in the production, a statement disclosing the percentage of neutral spirits and the commodity from which distilled. <input type="checkbox"/> Is the statement on the label?</p>
<p>Commodity Statement (Neutral Spirits or Gin)</p> <p>Example: “Distilled from Potato”</p>	<p>27 CFR 5.71</p>	<p>In the case of neutral spirits or of gin produced by a process of continuous distillation, a statement of the commodity from which the neutral spirits were distilled.</p> <p><input type="checkbox"/> Is the statement on the label?</p>
<p>State of Distillation</p> <p>Example: “Distilled in Idaho” or “Idaho Corn Whisky”</p>	<p>27 CFR 5.66(f)</p>	<p>For certain types of whisky produced in the United States, the State of distillation must be shown on the label if the whisky is not distilled in the State given in the address on the label.</p> <p><input type="checkbox"/> Is a State of distillation required on the label?</p>
<p>Mandatory information that may appear on ANY label (continued)</p>		
<p>Mandatory Item and Description</p>	<p>Regulatory Citation</p>	<p>Checklist</p>
<p>Statement of Age</p> <p>Example: “3 Years Old,” or “Aged not less than 6 months”</p>	<p>27 CFR 5.74</p> <p>See also: FAQ S11</p>	<p>Mandatory for:</p> <ul style="list-style-type: none"> • Whisky aged less than 4 years • Grape lees, grape pomace, or grape marc brandy aged less than two years. • Distilled spirits labeled with certain miscellaneous age references or representations • Distilled spirits labeled with a distillation date <p><input type="checkbox"/> Is the statement on the label?</p> <p><input type="checkbox"/> Is it in an approved format? The following formats are acceptable: “_____ years old”; “_____ months old”; “Aged _____ years”; “Aged at least _____ years”; “Aged a minimum of _____ months”; “Over _____ years old”; “Aged not less than _____ years”; “____% whisky aged ____ years; ____% whisky aged ____ years.”</p>