



Distilled Spirits Labeling

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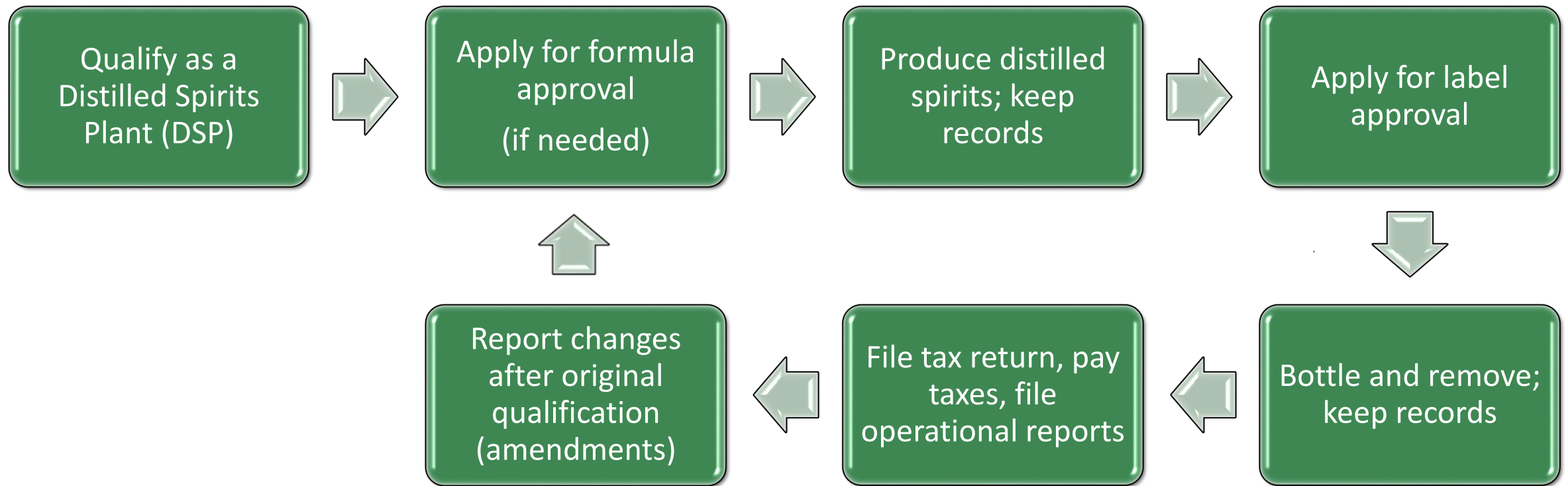
TTB Disclaimer

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 Lifecycle for Beverage Distilled Spirits Industry Members





Distilled Spirits Labeling Basics

- Mandatory labeling information
- Common distilled spirits labeling errors
- What is a COLA?
- At what stage do I apply for label approval?
- How do I apply for label approval?
- Tips for speedy label approval



Mandatory Information

This information must appear on the labels of all distilled spirits:

ON THE BRAND LABEL

- Brand name of the product
- Class/type (as defined in TTB regulations)
- Alcohol Content (% ABV)

ON ANY LABEL

- Bottler's or importer's name and address (city/state only)
- Net contents of the container
- Government Health Warning
- Country of origin (imports only)

27 CFR 5.32



Mandatory Information (if applicable)

When required, this information may appear on any label:

- Percentage of neutral spirits
- Commodity statement
- Statements of age
- State of distillation

- Sulfite declaration
- Coloring or flavoring materials
- FD&C Yellow #5
- Cochineal extract or carmine
- Treatment with wood

27 CFR 5.32



Common Distilled Spirits Labeling Errors

- The approved formula and the label contain conflicting information about the product, e.g., the alcohol content
- There are multiple class/type designations on the label(s), e.g., “Whisky with natural flavors” and “Whisky”
- The class/type designation is missing, or is not shown on the brand label
- There are errors in the Government Health Warning, e.g., punctuation errors or the words **GOVERNMENT WARNING** are not bold



What is a COLA?

- A **Certificate of Label Approval** signifies that a product label that was submitted to TTB complies with the applicable labeling requirements found in TTB regulations and policy
- A COLA is required for each product (product = distinct brand/distinct product designation/distinct label)
- COLAs must be obtained by each:
 - importer of bottled products, i.e., products imported in consumer containers
 - U.S. bottler of domestic products and products imported in bulk



At What Stage do I Apply for Label Approval?

Domestically bottled – COLA must be obtained prior to bottling the distilled spirit

Imported in bottles – COLA must be obtained prior to removal from Customs custody



Is a COLA Always Required?

- COLAs are required for each product that will be sold or otherwise introduced into interstate commerce, or that is imported in bottles
- If a distilled spirit product will only be sold in the state where it is bottled, the bottler may instead obtain a Certificate of Exemption from Label Approval
 - Label must include statement, “For sale in [name of state where bottled] only”



How Do I Apply for Label Approval?

- **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

- Know when you need to obtain formula approval, which is required prior to submitting your labels (see [Which Alcohol Beverages Require Formula Approval?](#))
- Be sure to accurately enter the brand name or fanciful name just as it appears on label
- Don't enter anything in the brand name or fanciful name fields except the brand name or fanciful name (e.g., do not enter the class/type designation in either of those fields)
- Take a look at your labels after you upload the files – if they are skewed or distorted remove them and upload images that accurately depict the real label



Where can I find more information?

- [TTB regulations](#): 27 CFR parts 5, 16, 19, and 27
- [Distilled Spirits Labeling Guidance on TTB.gov](#)
- [Anatomy of a Distilled Spirits Label Tool](#)
- [Mandatory Information Checklist](#)
- [Distilled Spirits Beverage Alcohol Manual \(BAM\)](#)
- [List of Allowable Changes to Approved Labels](#)

Contact Us

For more information about formulas, contact the [Alcohol Labeling and Formulation Division](#) at 866-927-2533, or send us a message using our [Online Contact Form](#)