Federal Wine Label Approval
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WineAmerica
Regulated by TTB

- Alcohol and Tobacco Tax and Trade Bureau
- Division of the Treasury Department
- Alcohol Formulation and Labeling Division (ALFD)
- 27 CFR Part 4: Wine advertising and labeling regulations
- Enforcement power designed to protect the consumer
- Not out to get you
Mandatory Information

• Brand or front label: Brand name or product, class/type/varietal, alcohol content, appellation of origin (if required)
• Any label: Bottling statement, net contents (can be blown in bottle) sulfite statement, government warning
Appellations of Origin

- Mandatory if the following is on the label:
  1. Grape Varietal: Chardonnay, Merlot, Traminette, etc.
  2. Vintage date
  3. Estate bottled (AVA required)
  4. Must appear on brand label
Appellations of Origin cont.

- Country (vintage date now permitted)
- State
- County
- American Viticultural Area (AVA)
- For country, state and county 75% of the wine must come from listed appellation
- For AVA 85% of the wine must come from listed appellation
Vintage Dating

- Permitted now for Country, State, County and AVA
- 85% of the grapes must come from that particular year for Country, State and County appellations
- 95% of the grapes must come from that particular year for AVAs
Additional Information

- Must be accurate and not misleading
- May not conflict with mandatory requirements
- Must comply with regulations
- Must be backed up with proper production records: Organic grapes, sustainable farming, etc.
- Allergen and Nutritional labeling: currently still voluntary
Prohibited Practices

- False or misleading statements
- Statements disparaging competition
- Obscene or indecent pictures/statements
- Implying intoxicating qualities
- Statements implying addition of distilled spirits
- Statements of age other than vintage dating
- Implying therapeutic benefits
- Implying endorsement of government or public figure
- Geographic brand names without use of proper AVA
Allowable Revisions

- TTB will allow existing labels to be used for future vintages without resubmitting labels
- Part of the process of streamlining approvals
- Listed on page 3 of COLA
- Personalized Labels
Online vs. Paper

- 90% of COLAs now submitted online
- The system prevents rejections
- Paper and online turnaround times equalized
- WineAmerica encourages online submittal
What to do in case of rejection

- Keep trying, there is a learning curve
- TTB mistakes: Human error does occur
- “I have labels going back ten years with the same info, and now it is rejected?”
Why join WineAmerica?

- Only National Winery Trade Organization
- TTB Guidance
- Congressional Outreach
- Grassroots reach
- Member benefits/discounts
- Annual meetings
Questions

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