

V. ALLOWABLE REVISIONS TO APPROVED LABELS

Once a label receives TTB approval, you are permitted to make certain changes to that label without submitting it to TTB. The label(s) identified on and affixed to this certificate may be revised without resubmission as follows:

NOTE: Any revision(s) you make to your approved label(s) must be in compliance with the applicable regulations in 27 CFR parts 4, 5, 7, and 16, and any other applicable provision of law or regulation, including, but not limited to, the conditions set forth in the "Comments" below.

YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
1. Delete any non-mandatory label information, including text, illustrations, graphics, etc.	YES	YES	YES	If the non-mandatory information in question relates to other information that remains on the label, it is your responsibility to ensure that the remaining information is not misleading after the deletion.
2. Reposition any label information, including text, illustrations, graphics, etc.	YES	YES	YES	The repositioning must comply with any placement requirements applicable to mandatory information. For example, some types of mandatory information must appear on the brand label or must appear together with other label information.
3.a. Change the color(s) (background and text), shape and proportionate size of labels.	YES	YES	YES	All changes must comply with applicable regulations, and changes in spelling must not change the meaning of the previously approved information. All mandatory information must be readily legible and appear on a contrasting background. Any revisions that affect mandatory label information must also comply with placement rules and other applicable requirements for such information.
3.b. Change the type size and font, and make appropriate changes to the spelling (including punctuation marks, changing letters from upper case to lower case and vice versa, and abbreviations) of words, in	YES	YES	YES	
3.c. Change from an adhesive label to one where label information is etched, painted or printed directly on the container and vice versa.	YES	YES	YES	
3.d. Divide a single approved label into multiple labels on a container, or combine separate labels that were approved under a single COLA into a single label on a container, provided that the label or labels comply with any applicable placement requirements for mandatory information and all other relevant requirements.	YES	YES	YES	
3.e. Combine separate labels that were approved under a single COLA into a single label on a container, provided that the label complies with any applicable placement requirements for mandatory information and all other relevant requirements.	YES	YES	YES	
4. Change the stated percentages for blends of grape varieties and appellations of origin for wine labels.	YES	N/A	N/A	When used for any of these items, the total percentages for each element must equal 100%. You may not change the name of the stated varieties or appellations without submitting a new application.
5. Add, change or delete a vintage date for wine labels.	YES	N/A	N/A	If the vintage date is deleted, no reference to "Vintage" may be made on any label or other materials (e.g., caps, capsules, corks, etc.) affixed to the bottle. When adding a new vintage date, you must comply with all applicable regulations, including the requirements regarding appellations of origin.
6. Change the optional "produced" or "made" by statements on wine labels to "blended," "vinted," "cellared" or "prepared" by statements.	YES	N/A	N/A	
7. Add, change or delete the stated amount of acid and/or the pH level for wine labels.	YES	N/A	N/A	
8. Change the stated amounts of sugar at harvest and/or residual sugar for wine labels.	YES	N/A	N/A	See ATF Ruling 82-4 for policy regarding use of sugar content statements and when such statements are required.
9. Add or delete bonded winery or taxpaid wine bottling house number for wine labels.	YES	N/A	N/A	If used, the number must appear in direct conjunction with the bottler's name and address.
10. Change the net contents statement.	YES	YES	YES	Revisions must comply with all applicable regulations governing net content statements and standards of fill. Please ensure that all applicable type size requirements are met for each container size.
11. Change the mandatory statement of alcohol content, as long as the change is consistent with the labeled class and type designation, and all other labeling statements.	YES	YES	YES (Flavored Malt Beverages Only)	For example, you may change the alcohol content of a grape wine labeled with a varietal designation from 13 percent to 15 percent alcohol by volume even though it results in a change to the product's tax classification. However, if the product was designated and labeled as a "table wine," an alcohol content of 15 percent alcohol by volume would be inconsistent with the rules for use of that designation, so this change would not be permitted. Similarly, a label bearing a "rum" designation may not be changed to state an alcohol content of less than 40 percent alcohol by volume. The revised alcohol content statement must be consistent with all other mandatory or optional labeling statements.
12. Add, delete, or change an optional statement of alcohol content for malt beverage labels.	N/A	N/A	YES	Malt beverages that contain alcohol derived from added flavors or other added nonbeverage ingredients (other than hops extract) containing alcohol are subject to mandatory alcohol content statement requirements.
13. Change the statement of percentage of neutral spirits and the name of the commodity from which a distilled spirit is produced.	N/A	YES	N/A	These changes must not result in a change to the class or type designation of the distilled spirits product.
14. Change the mandatory age statement, or delete or change an optional age statement for distilled spirits labels.	N/A	YES	N/A	These changes must not result in a change to the class or type designation. See 27 CFR 5.141 through 5.166 and 27 CFR 5.74 for further information about age statements and minimum aging requirements applicable to certain classes and types of spirits.
15. Delete or change an optional age statement, including a barrelaging statement, for wine and malt beverage labels.	YES	N/A	YES	Statements of age on wine labels must comply with 27 CFR 4.39(b).
16. Add, delete, or change statements or information in order to comply with the requirements of the State in which the malt beverage is to be sold.	N/A	N/A	YES	Applies only to malt beverages sold in that particular state (including the District of Columbia or the Commonwealth of Puerto Rico).
17. Add a new Serving Facts statement or statement of average analysis, add a Serving Facts statement to replace a statement of average analysis, or change the numerical values for calories, carbohydrates, protein, and fat contained in an existing statement.	YES	YES	YES	The statement must be in compliance with TTB Ruling 2013-2 and TTB Ruling 2004-1. A new Serving Facts statement is an allowable revision only if it is in one of the formats that is set forth in the examples attached to TTB Ruling 2013-2.
18. Add, delete, or change stated bottling date, production date (day, month, and/or year) or freshness information including bottling, production or expiration dates or codes.	YES	YES	YES	Bottling dates added to wine labels must comply with 27 CFR 4.39(c).
19. Change the name or trade name to reflect a different name already approved for use by the responsible bonded wine cellar, taxpaid wine bottling house, distilled spirits plant, brewery, or importer. Change the address where it is within the same State.	YES	YES	YES	This means that a bonded wine cellar, taxpaid wine bottling house, distilled spirits plant, brewery or importer may revise the label to include the use of a name or trade name that is already approved for that particular industry member. The name or trade name must appear on the basic permit, brewer's notice, or other qualifying documents for the company to whom the original certificate was issued. If the name or trade name is also used as the brand name on the label, resulting in a change of brand name, you must submit a new application. The change in address is ONLY allowed for in-state moves or other changes to the COLA holder's address that have already been reflected on the industry member's basic permit, brewer's notice, or other qualifying documents.
20. Add, delete, or change the name and/or address of the foreign producer, bottler, or shipper.	YES	YES	YES	The producer, bottler, or shipper must be located in the same country originally shown.

21. Add, delete, or change the name, address, and/or trademark of the wholesaler, retailer, or persons for whom the product is imported or bottled.	YES	YES	YES	
22. Add, delete, or change bottle deposit information, or container recycling information or logos.	YES	YES	YES	
23. Add, delete, or change UPC barcodes and/or 2D mobile barcodes, e.g., QR codes or Microsoft Tags.	YES	YES	YES	Addition or change of UPC Code must be in compliance with Industry Circular 77-23. Any information retrieved from 2D barcodes must be in compliance with all applicable advertising regulations.
24. Add, delete, or change a Web site address, phone number, faxnumber, or zip code.	YES	YES	YES	
25. Add, delete, or change a lot or batch identification number or other serial numbers.	YES	YES	YES	
26. Add, delete, or change trademark, copyright symbols (e.g., TM, ©, ®), kosher symbols, companylogos, and/or social media icons.	YES	YES	YES	Symbols, logos and icons may not violate TTB regulations. Advertisements on social media sites must be in compliance with all applicable advertising regulations.
27. Add, delete, or change optional information about awards or medals, or the signature of the brewer, winemaker, or distiller of the product.	YES	YES	YES	
28. Add, delete, or change holiday- and/or seasonal-themed graphics, artwork and/or salutations.	YES	YES	YES	Holiday/seasonal-themed information or graphics must not conflict with or qualify the mandatory information and must comply with all applicable regulations, including the rules governing prohibited practices.
29. Delete or change promotional sponsorship-themed graphics, logos, artwork, dates, event locations and/or other sponsorship-related information. (Examples: sports leagues, team organizations, annual sporting events, and annual or semi-annual festivals.) Delete or change charitable endorsement information to include information about the proceeds.	YES	YES	YES	If authorization by a third party was required for use of such promotional sponsorship-themed information on a label when first approved, it is the responsibility of the industry member to have any necessary documentation of authorization to cover the revisions to the approved label(s). The labeling statements may not create a misleading impression.
30. Add, delete, or change a label or sticker that provides information about a rating or recognition provided by an organization (e.g., "Recognized as one of the top values in vodka by x Magazine" or "Rated as the best 2012 wine by x Association"), as long as the rating or recognition reflects simply the opinion of the organization and does not make a specific substantive claim about the product or its competitors.	YES	YES	YES	These statements or graphics must not conflict with or qualify any mandatory information and must comply with all applicable laws and regulations. Substantive claims about the product or its competitors are not covered by this exemption.
31. Delete all organic references from the label.	YES	YES	YES	If you choose to delete one organic claim on a label on which you have received approval to make organic claims, then all organic claims, references and certification statements must be deleted on the revised label. The deletion of individual references or certification statements is not permitted without a new COLA.
32. Change an approved sulfite statement to any of these options: "Contains Sulfites", "Contains (a) Sulfiting Agent(s)", "Contains [name of specific sulfating agent]", "Contains Naturally Occurring and Added Sulfites", or "Contains Naturally Occurring Sulfites." "Sulphites" may be used in lieu of "Sulfites."	YES	YES	YES	A sulfite statement is required when sulfur dioxide or a sulfiting agent is detected at a level of 10 or more parts per million, measured as total sulfur dioxide.
33. Add, delete, or change information about the number of bottles that were "made," "produced," "brewed," or "distilled" in a batch; respectively.	YES	YES	YES	Example: "100 bottles produced"
34. Add, delete, or change between approved instructional statements about how best to consume or serve the product.	YES	YES	YES	Only the following statements are approved to be added to a label: <i>"Refrigerate After Opening"</i> <i>"Do Not Store In Direct Sunlight"</i> <i>"Best If Frozen For ___ to ___ Hours"</i> <i>"Shake Well"</i> <i>"Pour Over Ice"</i> <i>"Best When Chilled"</i> <i>"Best Served Chilled"</i> <i>"Serve Chilled"</i> <i>"Serve at Room Temperature"</i> <i>"Best Before _____"</i> <i>"Consume By _____"</i>
35. Add, delete, or change between approved responsibility statements.	YES	YES	YES	Only the following statements are approved to be added to a label: <i>"Drink Responsibly"</i> <i>"Enjoy Responsibly"</i> <i>"Enjoy in Moderation"</i> <i>"Sip Responsibly"</i>
36. Add, delete, or change between the listed sustainable farming, environmental, and eco-friendly claims.	YES	YES	YES	These statements must not conflict with or qualify any mandatory information and must comply with all applicable laws and regulations. It is the responsibility of the industry member to have any necessary documentation of authorization to cover the revisions to the approved label(s). Only the following statements are approved to be added to a label: <i>"Sustainable Farming"</i> <i>"Sustainably Grown"</i> <i>"Carbon Neutral"</i> <i>"Environmentally Friendly"</i> <i>"Vegan-Friendly"</i> <i>"Eco-Friendly"</i> <i>"Biodynamic"</i> <i>"Salmon Safe"</i> <i>"Don't Litter"</i> <i>"Environmentally Conscious"</i> <i>"Eco-Conscious"</i>
37. Add, delete, or change between approved food pairing recommendations.	YES	YES	YES	Only the following food pairing statements are approved to be added to a label: <i>"Best paired with [name of food]"</i> <i>"Best served with [name of food]"</i>
38. Add, change, or delete opening instructions for a box wine container.	YES	N/A	N/A	The instructions may include graphics limited to showing the step-by-step guidance.
39. Add, change, or delete a statement providing tapping instructions for a keg.	YES	N/A	YES	
40. Add to, change on, or delete from the label or container the name (or name and address) of the container manufacturer.	YES	YES	YES	
41. Change the stated numerical representation of the International Bitterness Units or Original Gravity.	N/A	N/A	YES	

If you have questions about what is mandatory information and what is non-mandatory information, please consult the applicable regulations in 27 CFR parts 4, 5, 7, and 16, or contact TTB. See Section IV for how to contact TTB.

PAPERWORK REDUCTION ACT NOTICE

This request is in accordance with the Paperwork Reduction Act of 1995. We collect this information to verify your compliance with the Federal laws and regulations we administer for the labeling of alcohol beverages. The information is mandated by statute (27 U.S.C. 205) and is used to obtain a benefit.

We estimate 31 minutes as the average burden for you to complete this form depending on your individual circumstances. You may comment to us about the accuracy of this burden estimate and suggest ways for us to reduce the burden. Address your comments or suggestions to the Paperwork Reduction Act Officer, Regulations and Rulings Division, Alcohol and Tobacco Tax and Trade Bureau, 1310 G Street, NW., Box 12, Washington, DC 20005 (please do not mail completed forms to this address).

We may not conduct this collection of information, and you are not required to respond to this request, unless it displays a valid, current OMB control number.

DISCLOSURE STATEMENT

We require this information under the authority of 27 U.S.C. 205(e). You must disclose this information so we may verify your compliance with the Federal laws and regulations we administer for the labeling of alcohol beverages.

We use this information for the purposes described in the preceding paragraph. In addition, the information may be disclosed to other Federal, State, and local law enforcement and regulatory agency personnel to verify information on the application and to aid in the performance of their duties. The information may further be disclosed to the Justice Department if it appears that the furnishing of false information may contribute to a violation of Federal law. If you fail to supply complete information, there will be a delay in the processing of your application.

After TTB issues a certificate of label approval, a certificate of exemption from label approval, or a distinctive liquor bottle approval, copies of the approved applications are made available for public inspection.