



TTB Public Guidance

Personalized Labels

We are taking steps to improve processing time for Certificates of Label Approval (COLAs) without compromising our mandates under the [Federal Alcohol Administration Act](#) (FAA Act). We want to remove impediments without sacrificing our responsibilities to ensure a fair marketplace in which consumers receive truthful and accurate labeling information and to ensure that alcohol beverage labels do not mislead consumers as to the age, origin, identity, or other characteristics of the product. One step we have taken is to review the guidance we issued in 2010 on submitting personalized labels for approval. To help lawful and compliant products get to market faster, we are issuing this guidance, which supersedes TTB G 2010–1, Personalized Labels, dated April 7, 2010.

To whom does this guidance apply?

This guidance applies to alcohol beverage industry members, including importers, bottlers, and occasionally wholesalers, who submit applications for approval of labels that will be personalized.

What is a personalized label?

Importers, bottlers, and wholesalers of alcohol beverages may offer personalized labels to consumers who desire to have a special label appear on the container. The labels contain a personal message, picture, or other artwork that is specific to the consumer who is purchasing the product. For example, a winery may create a personalized label for a bottle of wine that individual or corporate customers will use to commemorate a special event, such as an anniversary, a wedding, or a grand opening. For this reason, the names and dates on a personalized label may change based on the event that is being recognized (for example, “Happy 50th Birthday, Mary” or “Congratulations to Jim and Sue on their 40th wedding anniversary, April 25, 2011”).

You should not confuse personalized labels with customized private labels created for purchasers other than the ultimate consumer. Such private labels may bear a brand name or artwork that is specific to the purchaser who is buying the product in order to sell it to consumers. For example, a distilled spirits, wine, or malt beverage industry member may create private labels for customers who may include other permittees, retail stores or restaurants. This guidance document does not apply to such private labels, which are subject to the same requirements as other labels. Nor does this document apply to changes to approved labels that are made after the container bearing the label has been removed from the bottling premises or

from customs custody and shipped in interstate commerce. Such changes are generally prohibited, subject to limited exceptions set forth in the regulations at [27 CFR 4.30\(b\)](#), [5.31\(b\)](#) and [7.20\(c\)](#).

What is TTB's Legal Authority?

Our jurisdiction over the labeling of distilled spirits, wine, and malt beverages comes from the labeling provisions of the FAA Act ([27 U.S.C. 205\(e\)](#)) and the regulations found in Title 27 of the Code of Federal Regulations ([27 CFR parts 4, 5 and 7](#)). The statute and regulations generally require applicants to obtain approved COLAs prior to bottling, or removing from customs custody in bottles, alcohol beverages for introduction in interstate commerce. Furthermore, alcohol beverage containers are required to bear a health warning statement in accordance with the provisions of the Alcoholic Beverage Labeling Act of 1988 ([27 U.S.C. 215](#)) and the regulations in [27 CFR part 16](#). Finally, distilled spirits, wine and beer containers must comply with the labeling and marking requirements of [Chapter 51](#) of the Internal Revenue Code of 1986 and the implementing regulations under [27 CFR parts 19, 24, 25, and 27](#).

What is TTB's policy regarding use of personalized labels?

TTB has received inquiries about what types of changes may be made to approved labels without the need to apply for and obtain a new COLA. The COLA only covers labels as displayed on the COLA form, [TTB F 5100.31](#), as well as allowable revisions as outlined in Section V of that form. However, for personalized labels, it has long been our policy to permit the holder of an approved COLA to change items such as salutations, names, and event dates on the label without applying for a new COLA. Our 2010-1 guidance did not allow certificate holders to change the artwork or graphics on personalized labels without resubmission of the labels for approval. We have reconsidered this requirement and now permit certificate holders to make changes to the graphics or artwork on a previously approved personalized label without having to apply for a new certificate of label approval.

How do I apply for approval of a personalized label?

Applicants who wish to obtain approval from TTB to make changes to personalized labels must indicate this intention on their application for label approval. You may apply for a COLA electronically with [COLAs Online](#) or by submitting [TTB F 5100.31](#) by mail to [our office](#). You have the option to obtain individual COLAs for each personalized label. However, if you want the flexibility to make changes to the personalized labeling information without submitting new applications for label approval, you should follow the following steps.

Initially, you should apply for a COLA that will act as a template and will include a label or labels that, at a minimum, contain all mandatory information required by the applicable regulations,

including [27 CFR parts 4, 5, 7 and 16](#), as well as any other information on the label that is not part of the personalized label. In addition, the application must contain in item 19 of the [paper application](#), or in the *special wording* section found in Part II/Step 2 in [COLAs Online](#), a description of the specific personalized information that may change. For example, the application may state: “The graphics, salutations, dates, and artwork presented on this label may be changed to personalize this label.” For bottles etched with personalized information, the application must also indicate in item 19 of the paper application or in the *special wording* section found in Part II/Step 2 in COLAs Online that personalized information will be etched on the bottle. The label submitted with the COLA may contain a “blank” area where customized artwork or information will appear when the actual labels are printed.

When we approve a COLA for personalized labels, we will include the following qualification:

The approval of this COLA covers this label and any additions, deletions or changes in graphics, salutations, congratulatory dates and names, and artwork to personalize the label as indicated on the application. This approval to change the personalizing information does not permit the addition of any information that discusses either the alcohol beverage or characteristics of the alcohol beverage or that is inconsistent with or in violation of the provisions of 27 CFR parts 4, 5, 7 or 16, as applicable, or any other applicable provision of law or regulations.

As previously stated, a COLA generally covers only labels that are identical to the label submitted with the form, as well as allowable revisions as outlined in Section V on [TTB F 5100.31](#). When you receive approval for a personalized label, with the qualification set forth above, you may also make changes consistent with the qualification. The personalized label qualification does *not* authorize you to change any of the mandatory label information, for example the brand name or the class or type designation, when you personalize a label. Furthermore, any discussion of the alcohol beverage product or its characteristics is not covered by the authorization to add personalized information to the label.

What is prohibited from appearing on a personalized label?

Personalized information and artwork on labels are subject to all the same regulations, including the regulations regarding prohibited practices, as information and graphics on non-personalized labels. You may not add personalized statements, graphics, pictorial or emblematic representations that are not allowed on labels that undergo TTB review.

Generally labels may not contain false or misleading information, including misleading health claims, or other prohibited items as specified in [27 CFR 4.39](#), [5.42](#) and [7.29](#).

The personalized information on a label must not conflict with or qualify the mandatory information appearing on the label. Furthermore, labeling information that in any way discusses the alcohol beverage product or its characteristics is not considered personalized information.

Whom should I contact for more information?

If you have any questions about personalized labels, please contact the Advertising, Labeling and Formulation Division:

- By phone at 202-453-2250 or toll free at 1-866-927-2533
 - option 4: Distilled Spirits and Malt Beverage Labeling, or
 - option 6: Wine Labeling; or
- By email at afd@ttb.gov.