



## **Certification for the Analysis of Wine or Distilled Spirits for Export**

**To: *All Alcohol and Tobacco Tax and Trade Bureau Regulated Industries and Commercial Laboratories Who Conduct Tests on Alcohol Beverages.***

### **1. Purpose.**

The purpose of this Procedure is to provide instructions on how to apply for Alcohol and Tobacco Tax and Trade Bureau (TTB) certification in the analysis of wine or distilled spirits for export.

### **2. Authority.**

Chapter 51 of the Internal Revenue Code of 1986 and the Federal Alcohol Administration Act, section 205(e) of title 27, U.S.C.

### **3. Background.**

As a condition of entry for imported wine and distilled spirits, many countries require the presentation of specific chemical analyses. Some of these countries mandate that their own government laboratories, or laboratories certified by their government, analyze such products. Other countries allow the exporting country to perform the analyses, as long as a person certified by that government completes the report of analysis.

To facilitate the export of domestic wine and spirits products, TTB offers a certification program twice a year as a service to the alcohol beverage industry. This service aligns with the Department of the Treasury's strategic outcomes of strong U.S. economic competitiveness and enabled free trade and investment. This Procedure changes three aspects of the certification program to: (1) Expand who may apply for certification, (2) revise the list of analyses for certification based on the current requirements of various importing countries, and (3) establish a proficiency testing program for certification by which TTB issues the test samples to the applicants. Results will be forwarded to TTB and assessed to determine certification suitability.

### **4. Superseded Procedures.**

This Procedure supersedes:

- a. ATF Procedure 86–2, ATF Certification of Chemists, Enologists or Laboratories, which set forth the requirements for chemists or laboratories to apply for TTB certification for the analysis of wine for export.
- b. Revenue Procedure 69–22, Qualification and Certification of Chemists and Laboratories to Analyze Distilled Spirits for Export, which established procedures for chemists or laboratories seeking TTB certification to analyze distilled spirits for export.

## **5. Eligibility for Certification.**

- a. The applicant must be employed by or otherwise affiliated with a qualified laboratory. TTB does not certify laboratories, but rather applicants who perform the analyses or applicants who supervise individuals who perform the analyses, provided the individuals are trained and competent in the methods under the certification. An application for certification must identify the names of both the individual and the laboratory, as well as the address of the laboratory premises.
- b. A “qualified laboratory” is defined as a laboratory equipped to perform all necessary analyses for certification of wine or distilled spirits and employs an individual certified by TTB to perform or supervise the analyses in Tables 7.1 or 7.2.
- c. In conjunction with the application for certification, an appropriate official of the laboratory must consent to the inspection of the laboratory premises or other appropriate TTB validation of the claims made in the application.
- d. Certification is dependent upon continued employment with the qualified laboratory. If a certified individual and the qualified laboratory dissolve their association during the two-year certification period, the certification is voided. TTB no longer considers the individual certified and he or she must notify TTB immediately of the change in employment status. Further, if no certified individual is employed by the qualified laboratory then TTB considers that laboratory no longer qualified.
- e. A certified individual may retain his or her certification in the event that he or she takes a position with another qualified laboratory. Retention of certification status is contingent upon the subsequent laboratory’s qualification as equipped to perform analyses of the same type (i.e., wine or distilled spirits) as the certified individual.
  - (1) In such cases, the certified individual must notify the Director, Scientific Services Division (SSD), of the change in employment status on the subsequent laboratory letterhead.

- (2) TTB will evaluate the applicant's claims and issue an updated certificate that identifies the certified individual and qualified laboratory.
- (3) The certified individual, if he or she wishes to remain certified, must reapply for certification prior to the expiration of the original two-year certification period.

## 6. Application Deadlines and Expiration of Certification.

- a. TTB issues certifications twice a year, on January 1 and July 1. Applicants must submit their application, including a request to obtain testing samples, to SSD no later than two months prior to those dates.
  - (1) For certification to take effect **January 1**:
    - (i) A call for applications will be announced on TTB's website no later than **September 1**. For those individuals who are currently certified and whose certification is about to expire, TTB will notify them directly.
    - (ii) A written request for participation in the Certification Program is due to SSD by **October 1**. If an application is received after the deadline, the applicant will not be considered for certification in the current round and may be considered for the next round.
    - (iii) Upon receipt of an application, TTB will notify the applicant of an approximate date that samples will be sent. If qualifications are not met, the applicant will be notified in writing as to the reasons.
    - (iv) The samples will arrive to the requestor for analysis by **November 1**.
    - (v) The data packet is due to TTB by **December 1**.
  - (2) For certification to take effect **July 1**:
    - (i) A call for applications will be announced on TTB's website no later than **March 1**. For those individuals who are currently certified and whose certification is about to expire, TTB will notify them directly.
    - (ii) A written request for participation in the Certification Program is due to SSD by **April 1**. If an application is received after the deadline, the applicant will not be considered for certification in current round and may be considered for the next round.

- (iii) Upon receipt of an application, TTB will notify the applicant of an approximate date that samples will be sent. If qualifications are not met, the applicant will be notified in writing as to the reasons.
  - (iv) The samples will arrive to the requestor for analysis by **May 1**.
- b. The data packet is due to TTB by **June 1**. Certification is valid for two years. The individuals who wish to remain certified must reapply for certification prior to the expiration of their certification every two years. In doing so, they may continue to operate under their current certification pending final action on their reapplication.

## **7. How to Apply for Certification.**

To apply, an applicant must submit the following to the Director, SSD, at the Alcohol and Tobacco Tax and Trade Bureau, Scientific Services Division, 6000 Ammendale Road, Beltsville, MD 20705-1250:

- a. A request for participation in the Certification Program on laboratory letterhead signed by the applicant.
- b. A statement in the letter authorizing TTB to verify laboratory and candidate training documents as noted in section 8 of this Procedure.
- c. The correct shipping address to where samples are to be shipped and the correct mailing address to where the certificate is to be delivered.
- d. Documentation supporting the educational qualifications of the applicant including a copy of his or her diploma and transcripts, if these are not already on file with TTB.

## **8. Qualifying for Certification.**

- a. To qualify for Wine Analysis certification by the Director, SSD, the applicant will:
  - (1) Have at least:
    - (i) A Bachelor's degree in chemistry; or
    - (ii) A Bachelor's degree in any physical, chemical, or biological science and at least 30 credits of chemistry; or
    - (iii) A Bachelor's degree in enology.

The applicant must submit a copy of his or her diploma and transcripts with the application, if these are not already on file with TTB.

In all cases, an applicant with a degree obtained from a college or university outside the United States must have his or her degree evaluated by an educational assessment organization.

- (2) Have access to laboratory equipment and facilities as are necessary to perform the required wine analyses (see Table 7.1). The adequacy of such equipment and facilities is subject to TTB verification or inspection.
- (3) Receive two 750 mL bottles of wine for each cycle of testing. Upon completion of the analyses, each participant will submit to the Director, SSD, a report of analysis that includes all analyses in Table 7.1 for each wine analyzed. The data should be obtained by a validated method, preferably in accordance with the latest edition of the Official Methods of Analysis, published by the AOAC INTERNATIONAL, or the [TTB Official Methods](#), as listed on [www.ttb.gov](http://www.ttb.gov).

Applicants should use the [wine reporting template](#) to report their analytical results, as well as the methods used to obtain the results. TTB prefers that applicants use the units of measurement in Table 7.1. TTB will consider and approve alternative methods on a case-by-case basis.

**Table 7.1.**

<b>Analysis</b>	<b>Reported to the nearest:</b>
Alcohol by volume	0.1% by volume
Total Extract	0.01 g/100 mL
Total Acidity as Tartaric Acid	0.01 g/100 mL
Volatile Acidity	0.001 g/100 mL
Citric Acid	0.1 g/L
Total Sulfur Dioxide	1 mg/L
Residual Sugars (expressed as glucose + fructose)	0.1 g/100mL
Sorbic Acid	1 mg/L
Methanol	0.01% by volume

b. To qualify for Distilled Spirits Analysis certification by the Director, SSD, the applicant will:

(1) Have, at least:

- (i) A Bachelor's degree in chemistry; or
- (ii) A Bachelor's degree in any physical, chemical, or biological science and at least 30 credits of chemistry.

The applicant must submit a copy of his or her diploma and transcripts with the application, if these are not already on file with TTB.

In all cases, an applicant with a degree obtained from a college or university outside the United States must have his or her degree evaluated by an educational assessment organization.

- (2) Have access to laboratory equipment and facilities as are necessary to perform the required distilled spirits analyses (see Table 7.2). The adequacy of such equipment and facilities is subject to TTB verification or inspection.
- (3) Receive two 750 mL bottles of distilled spirits for each cycle of testing. Upon completion of the analyses, each participant will submit to the Director, SSD, a report of analysis that includes all analyses in Table 7.2 for each spirit sample analyzed. The data should be obtained by a validated method, preferably in accordance with the latest edition of the Official Methods of Analysis, published by the AOAC INTERNATIONAL, or the [TTB Official Methods](#), as listed on [www.ttb.gov](http://www.ttb.gov).
- (4) Applicants should use the [distilled spirits reporting template](#) to report their analytical results, as well as the methods used to obtain the results. TTB prefers that applicants use the units of measurement in Table 7.2. TTB will consider and approve alternative methods on a case-by-case basis.

**Table 7.2.**

<b>Analysis</b>	<b>Reported to the nearest:</b>
Apparent Proof (determined without Obscuration)	0.1 degrees Proof at 60 °F
True Proof (determined by Apparent Proof + Obscuration) <b>OR</b>	0.1 degrees Proof at 60 °F

True Proof (determined by Distillation)	
Total Solids	0.1 g/100L
Specific Gravity	0.00001 at 20 °C
Total Acidity as Acetic Acid	0.1 g/100L
Methanol	0.01% by volume
Ethyl Acetate	0.1 g/100L
n-Propyl Alcohol	0.1 g/100L
Isobutyl Alcohol	0.1 g/100L
n-Butyl Alcohol	0.1 g/100L
Amyl Alcohols (determined by iso-Amyl Alcohol + active Amyl Alcohol)	0.1 g/100L
Furfural	0.1 g/100L

c. Applicants who desire to be certified by TTB and are employed in a laboratory that is ISO 17025 accredited may be eligible for certification without submission of a report of analysis. Applicants must:

- (1) Possess the educational requirements outlined in sections 7a (wine) or 7b (distilled spirits) of this Procedure:
- (2) Submit a copy of his or her laboratory's accreditation certificate verifying the current status along with a list of methods under the scope of accreditation. If the laboratory is accredited to analyze wine, the scope of accreditation must encompass each and every analysis listed in Table 7.1. If the laboratory is accredited to analyze distilled spirits, the scope of accreditation must encompass each and every analysis listed in Table 7.2.

Certification is dependent upon continued accreditation of the qualified laboratory. If a laboratory loses accreditation during the two-year certification period or if any of the methods listed in Tables 7.1 or 7.2 are removed from the scope of accreditation, the certification will become void as of the date that the laboratory accreditation is no longer valid, or as of the date of removal of the specified methods. Should this situation occur, TTB will no longer consider any individual in the aforementioned laboratory certified and the laboratory must notify TTB immediately of the change in accreditation status.

- (3) Submit training records and provide proof that the applicant has demonstrated competency in all analyses listed for wine and or distilled spirits.

## **9. Verification of Information.**

TTB reserves the right to verify, by inspection or otherwise, the laboratory's premises and equipment associated with the application for certification. This includes, but is not limited to, the availability of equipment, equipment purchase records, analyst training and competence records, and sample analyses records. A request for participation in the Certification Program on laboratory letterhead must include the following statements, endorsed by an appropriate laboratory official, authorizing TTB to inspect or validate the laboratory premises, training documents, and equipment:

- a. *"(Name of qualified laboratory with an applicant seeking certification) authorizes TTB to verify by inspection or otherwise the laboratory's premises and equipment, documents related to training and demonstration of competency on the methods associated with this application for certification."*
- b. *"(Name of Applicant) declares, under penalties of perjury, that the information provided to TTB is true and correct."*

## **10. Notification of Applicants.**

- a. Approval of Certification Application.

If TTB chemists validate the report of analysis submitted by the applicant, and the applicant meets all other requirements, the Director, SSD, will certify the applicant.

The certified individual will receive a signed certificate and approval letter by mail identifying the name of the individual and affiliation of the applicant. The certificate also indicates the two-year period that the certificate is valid.

- b. Denial of Certification Application.

If an applicant does not meet the requirements for certification, the Chief, Beverage Alcohol Laboratory will notify the applicant in writing stating the reasons why TTB did not approve the application for certification.

## **11. Additional Report of Analysis Requirements for Certified Individuals.**

- a. If the importing country requires additional analytical data, other than those listed in Tables 7.1 and 7.2 of this Procedure, and the certified individual intends to report the additional data as certified by TTB, the certified individual



must notify the Director, SSD prior to reporting. In this case, there are additional qualifying requirements:

- (1) The notification must be a written request and must include both the analyte(s) of interest and the analytical methods used to determine the value.
  - (2) SSD may also require a sample and the report of analysis of the analyte(s) of interest.
  - (3) SSD requires that the notification coincide with TTB's two certification periods, which begin January 1 and July 1. Applications and samples must be postmarked:
    - (i) No later than **October 31**, for TTB to process the application and certify the individual by **January 1**; or
    - (ii) No later than **April 30**, for TTB to process the application and certify the individual by **July 1**.
  - (4) SSD will notify the applicant in writing of his or her certification status.
- b. Certified individuals must sign the report of analysis, if a signature is required by the country importing the product.
- c. If the report of analysis is being prepared for a country that requires a statement by a U.S. Government official on the report of analysis:
- (1) The certified individual may send the signed report of analysis to the Director, International Trade Division (ITD), at:

Alcohol and Tobacco Tax and Trade Bureau  
International Trade Division  
1310 G Street, NW., 4<sup>th</sup> Floor  
Washington, D.C. 20220
  - (2) The Director, ITD or his/her designee may affirm the results on the report of analysis by attaching the following statement: *"I hereby attest that (name of certified individual and qualified laboratory) is duly certified to make analyses under TTB Procedure 2010-1."*
  - (3) TTB will retain one copy of the affirmed report of analysis, and TTB will forward the remaining copy to the certified chemist.

## 12. Questions.

The [current list](#) of certified individuals and qualified laboratories is available on the TTB Web site, [www.ttb.gov](http://www.ttb.gov).

If you have any questions regarding this Procedure, please contact:

U.S. Mail: Alcohol and Tobacco Tax and Trade Bureau  
Scientific Services Division  
Beverage Alcohol Laboratory  
6000 Ammendale Road  
Beltsville, MD 20705-1250

E-mail: [laboratory@ttb.gov](mailto:laboratory@ttb.gov)

***Signed by John J. Manfreda***

John J. Manfreda  
Administrator  
Alcohol and Tobacco Tax and Trade Bureau