

## **MALT BEVERAGE LABEL EXAMPLES:**

This section is designed to provide examples of approvable malt beverage labels using the most common label formats submitted to the Alcohol and Tobacco Tax and Trade Bureau (TTB), along with additional comments to further explain some aspects of the labeling rules.

The TTB regulations are quite detailed in regard to the production of beer (see [27 CFR part 25](#)) and the information appearing on malt beverage labels (see [27 CFR part 7](#) and [27 CFR 16](#)), and although we have assembled some examples in this document that should prove useful, they are not intended to be all-encompassing.

This information is being issued to help the public understand and comply with the laws and regulations that TTB administers. It is not intended to establish any new, or change any existing, definitions, interpretations, standards, or procedures regarding those laws and regulations.

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## **CONTRACT BREWING:**

Scenario 1: Contract Brewing with Use of a Trade Name/Doing Business As (DBA)



In this example, Example Brewing Co. (Arlington, VA) has entered into a contract brewing agreement with Beer Brewing Company (Baltimore, MD) to produce their Wheat Beer product to help meet demand. As part of the contract, Beer Brewing Company must add the trade name "Example Brewing Co." to its brewer's notice.

**Name and Address as shown on the Contract Brewer's Notice:**

Beer Brewing Company

123 Road

Baltimore, MD 21202

DBA: Example Brewing Co.

**Brand Name:** Example Brewing Co.

## Scenario 2: Multiple Locations – Contractee and Contractor Locations

In this example, Example Brewing Co. (Arlington, VA) has entered into a contract brewing agreement with Beer Brewing Company (Baltimore, MD) to meet demand of their product. Beer Brewing Company has added "Example Brewing Co." as a trade name to its brewer's notice. The 'Wheat Beer' will be produced at both locations. To save costs, the brand owner, Example Brewing Co. would like to use one label for both locations.

**Note:** Both Example Brewing Co. and Beer Brewing Company must obtain COLA approvals under their own brewer's notices in order to bottle Example's malt beverage product.

**Name and Address as shown on the Brewer's Notice:**  
Beer Brewing Company  
123 Road  
Baltimore, MD 21202  
DBA: Example Brewing Co.

**Brand Name:** Example Brewing Co.

Scenario 3: Multiple Locations – Two Contract Brewing Locations (Same Label)



In this example, Example Brewing Co. (Arlington, VA) has entered into a contract brewing agreement with Beer Brewing Company (Baltimore, MD) and Mega Beer Co (Arlington, VA) to meet demand of their product. Both contract brewers have added "Example Brewing Co." as a trade name to their brewer's notice. The 'Wheat Beer' will be produced at both locations.

To save costs, the brand owner, Example Brewing Co., would like to design one label for both contract brewing locations.

**Note:** Both Beer Brewing Company and Mega Beer Co. must obtain their own COLA approval as the bottler of the malt beverage. In this example, we will go over the COLA approval for Beer Brewing Company only. Mega Beer Co. would follow the same process upon submission of their separate COLA request.

**Name and Address as shown on the Brewer's Notice:**

Beer Brewing Company

123 Road

Baltimore, MD 21202

DBA: Example Brewing Co

**Brand Name:** Example Brewing Co.

**Alternative Allowable Name and Address Label Statements:**

- Brewed and Bottled under supervision by Example Brewing Co. Baltimore MD, and Arlington, VA
- Brewed and Bottled under license by Example Brewing Co. Baltimore MD, and Arlington, VA

## **CONTRACT BOTTLING:**

### *Scenario 1: Contract Bottling*



In this example, Beer Brewing Company (Baltimore, MD) has entered into a contract with Example Brewing Co. (Arlington, VA) to bottle its India Ale Pale product into kegs. Both companies are independently owned.

#### **Notes:**

- The COLA may be obtained only by the bottler
- A brewed by statement is optional
- The name and address of the bottler is required

#### **Bottler's Name and Address as shown on the Brewer's Notice:**

Example Brewing Co.  
123 Road  
Arlington, VA 20301

**Brand Name:** Example Brewing Co.

#### **Alternative Allowable Name and Address Label Statements:**

- Bottled by Example Brewing Co., Arlington, VA
- Packed by Example Brewing Co., Arlington, VA for Beer Brewing Company

**REMINDER:** If the bottler, Example Brewing Co., removes the product for consumption or sale after bottling, they are not entitled to remove the product at a reduced rate of tax because they are not the producing brewer. However, the bottler may transfer the product back to Beer Brewing Company after bottling without payment of tax and Beer Brewing Company, as the producing brewer, may remove the product from its brewery at the appropriate reduced rate of tax.

## Scenario 2: Contract Bottling



In this example, Beer Brewing Company (Baltimore, MD) has entered into a contract with Example Brewing Co. (Arlington, VA) to bottle their beer into kegs. Both companies are independently owned.

### Notes:

- The COLA may be obtained only by the bottler
- A brewed by statement is optional
- The name and address of the bottler is required

### Name and Address as shown on the Brewer's Notice:

Example Brewing Co.  
123 Road  
Arlington, VA 20301

**Brand Name:** Example Brewing Co.

### Alternative Allowable Name and Address Label Statements:

- Brewed by Beer Brewing Company Baltimore, MD and Packed by Example Brewing Co, Arlington, VA
- Packed by Example Brewing Co, Arlington, VA for Beer Brewing Company

**REMINDER:** If the bottler, Example Brewing Co., removes the product for consumption or sale after bottling, they are not entitled to remove the product at a reduced rate of tax because they are not the producing brewer. However, the bottler may transfer the product back to Beer Brewing Company after bottling without payment of tax and Beer Brewing Company, as the producing brewer, may remove the product from its brewery at the appropriate reduced rate of tax.

## GROWLER:



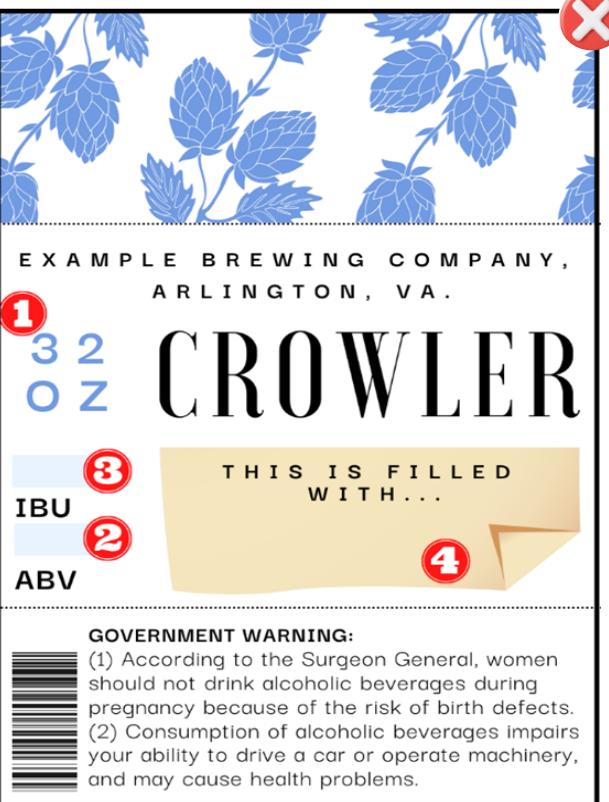
In this example, Malt & Hop Brewery (Hyattsville, MD), the producing brewer and bottler of the malt beverage, has submitted a COLA for a growler that needs to be corrected, as outlined below.

**Note:** Growlers that are filled at the time of purchase at a brewer's tavern/brewpub do not generally require label approval (see [TTB Beer FAQ B9](#)). If filled in advance of sale, however, growlers are subject to labeling requirements of [27 CFR parts 16](#) and [25](#). In some States, TTB's labeling requirements of [27 CFR part 7](#) also apply. To obtain a COLA for growlers/crowlers containing malt beverages, the label must comply with the requirements under 27 CFR parts 7, 16, and 25.

### Growler – Corrections:

1. The Net Contents on the label example on the left is incorrectly stated. If a malt beverage container is 32 fl. oz., the correct net contents must be stated as 1 quart (see [27 CFR 7.70](#)).
2. The Class and Type Designation is missing. Using a generic class and type designation such as "Beer" would satisfy this requirement, and also give the flexibility to use the label more than once as it pertains to products that do not require a fanciful name and statement of composition. In this example, the requirement has been satisfied by the addition of "Nene's Beer" to the label. Additionally, the section "Name/Style" must be filled out prior to label approval because this information must be printed on the label (handwritten text is not allowed).

## CROWLER:



In this example, Example Brewing Company (Arlington, VA), the producing brewer and bottler of the malt beverage, has submitted a COLA for a crowler that needs to be corrected, as outlined below.

**Note:** Crowlers (which TTB treats similarly to growlers) filled at the time of purchase at a brewer's tavern/brewpub are not subject to federal labeling requirements (see [TTB Beer FAQ B9](#)). If filled in advance of sale, however, crowlers are subject to labeling requirements of [27 CFR parts 16](#) and [25](#). In some States, TTB labeling requirements of [27 CFR part 7](#) also apply. To obtain a COLA for growlers/crowlers containing malt beverages, the label must comply with the requirements under 27 CFR parts 7, 16, and 25.

### Crowler – Corrections:

1. The [Net Contents](#) on the label example on the left is incorrectly stated. If a malt beverage container is 32 fl. oz., the correct net contents must be stated as 1 quart (see [27 CFR 7.70](#)).
2. The abbreviation “ABV” is not acceptable for the [Alcohol Content](#) statement. Instead, the alcohol percent by volume may be spelled out or abbreviated as provided in [27 CFR 7.65](#). (e.g., 5% ALC/VOL).
3. The addition of non-mandatory information, in this case the International Bitterness Units (IBU), requires label approval. Please note that additional information may be deleted as an [Allowable Revision](#). Changing the IBU would also require a new application.
4. The [Class and Type Designation](#) is missing. Using a generic class and type designation such as “Beer” would satisfy this requirement, and also give the flexibility to use the label more than once as it pertains to products that do not require a fanciful name and statement of composition. This requirement has been satisfied by the addition of “Jewel’s Ale” to the label. Additionally, this section (i.e. “This is filled with...”) must be filled out prior to approval because this information must be printed on the label (handwritten text is not allowed).

## KEG COLLAR:



In this example, Example Brewing Co. (Arlington, CA), the producing brewer and bottler of the malt beverage, has submitted a COLA for a keg that needs to be corrected, as outlined below. Kegs are consumer containers, just like bottles or cans. When a COLA is required, mandatory labeling requirements under 27 CFR parts [7](#) and [16](#) must be met. Unlike other labels, all information on keg labels may be handwritten, except for the [Health Warning Statement](#).

### Keg Collar – Corrections:

1. The [Health Warning Statement](#) is not compliant. The “S” and “G” in “Surgeon General” must be capitalized. Also, commas must appear after the words “General” and “machinery.”
2. When multiple [Class and Type Designations](#) are present on keg labels, you are required to select the product to which the application applies. This has been amended by the selection of “Axel Cream Ale.” Please note that a separate COLA application will need to be submitted for the other products listed and the appropriate product should be selected. Additionally, “Axel Cream” and “Plain Wit” are missing a class designation at the end.
3. Geographically significant malt beverage styles produced in a country other than the one indicated must be properly qualified with “style,” a phrase such as “Product of USA,” or other text to indicate the true place of production. Irish is geographically significant and as a result must be further qualified as seen in the compliant version of the label on the right (e.g. Irish-Style). For more information on geographical names for distinctive types of malt beverages, see [Class and Type Designations](#).
4. The [Alcohol Content](#) cannot be left blank and must be listed in the identified section. However, it is an [Allowable Revision](#) to change the stated alcohol content after approval.

### Notes:

- If the net contents statement is blown, embossed, or molded into a container, the measurements must be provided in the Special Wording section of the COLA application.

- For keg labels specifically, we allow the health warning statement to be blown, embossed, or molded into the container. Please note, the Health Warning Statement should be noted in the Special Wording section of the COLA application and be written out exactly as it appears.

## NUTRITIONAL CLAIMS:

### STATEMENT OF AVERAGE ANALYSIS:



In this example, Example Brewing Co. the producing brewer and bottler of the malt beverage, has submitted a COLA for a malt product described as “light” that needs to be corrected. The use of any caloric or carbohydrate references, including describing the product as “light,” on labels requires either a Serving Facts statement or a statement of average analysis that complies with the requirements of [TTB Ruling 2004-1](#) and [TTB Ruling 2013-2](#). Additionally, see [FAQs related to TTB Ruling 2004-1](#) and [FAQs related to TTB Ruling 2013-2](#). This applies to all containers used for the sale of malt beverages at retail, including kegs.

### Average Analysis – Corrections:

- Use of “Light” requires either a statement of average analysis or a Serving Facts statement.

### Notes:

- A statement of average analysis is often recommended for keg labels since it does not require the number of servings per container to be stated.
- Abbreviated terms may be used in the statement of average analysis. For example, “grams” may be stated as “g,” “calories” as “cal.” and “carbohydrates” as “carbs.”
- This is an [Allowable Revision](#) after approval. That is, an industry member may 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.

## SERVING FACTS:



In this example, Malt & Hop Brewery, the producing brewer and bottler, has submitted a COLA for a malt beverage described as “low calorie” with a Serving Facts statement that needs to be corrected. A Serving Facts statement appearing on a label or an advertisement may be stated per container size only if the container is equal to or less than a single serving size. Additionally, the serving size depends on the percent of alcohol by volume of the product. See statement of average analysis and Serving Facts statement requirements under [TTB Ruling 2004-1](#) and [TTB Ruling 2013-2](#). Additionally, see [FAQs related to TTB Ruling 2004-1](#) and [FAQs related to TTB Ruling 2013-2](#).

### Serving Facts – Corrections:

1. Due to the alcohol content of the product, the stated serving size needs to be revised from 24 fl. oz. to 12 fl. oz., with a corresponding change to the number of servings per container. The serving size should reflect that the container holds two single servings.
2. Remove “Sugar: 0g.” The carbohydrate statement includes sugars.

### Notes:

- Abbreviated terms may be used in the Serving Facts statement. For example, “grams” may be stated as “g,” “calories” as “cal,” and “carbohydrates” as “carbs.”
- This is an [Allowable Revision](#) after approval. That is, an industry member may 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.

## ALCOHOL FACTS:



In this example, Malt & Hop Brewing Co., the producing brewer and bottler of the malt beverage, has submitted a COLA for a malt product with an optional Alcohol Facts statement that needs to be corrected, as outlined below. See [FAQs related to Alcohol Facts](#) statements.

### Alcohol Facts – Corrections:

1. Due to the alcohol content of the product, the stated serving size needs to be revised from 12 fl. oz. to 5 fl. oz., with a corresponding change to the number of servings per container which should reflect the container holds two and a half servings.
2. The alcohol per serving statement also needs to be revised. The number of servings in a container must also be rounded to the nearest quarter of a serving.

### Notes:

- Serving sizes for purposes of Alcohol Facts labeling must be consistent with the sizes set forth in [TTB Ruling 2013-2](#). The number of servings per container is calculated by dividing the total net contents by the serving size as specified by TTB Alcohol FAQ [AF2](#). For examples of determining the number of servings per container, see TTB Alcohol FAQ [AF3](#).
- For examples of calculating the fluid ounces of alcohol per serving, see TTB Alcohol FAQ [AF4](#).

## GLUTEN:



In this example, Malt & Hop Brewery, the brewer and bottler of the malt beverage, has submitted a COLA application that needs to be corrected, as outlined below. Malt beverages fermented from one or more ingredients that are, or are derived from, gluten-containing grains may include truthful and accurate statements that the product was processed (or treated or crafted) to remove gluten under the conditions described in [TTB Ruling 2020-2](#).

### Gluten – Corrections:

1. “[Processed or Treated or Crafted] to remove gluten” must be qualified by the statement “Product fermented from grains containing gluten and [processed or treated or crafted] to remove gluten. The gluten content of this product cannot be verified, and this product may contain gluten.” The qualification must **be part of** (i.e., immediately adjacent to or as a continuation of) the “Crafted to Remove Gluten” statement. A disclaimer somewhere else on the label would not satisfy this requirement.
  - a. To avoid any impression that this product contains “wine,” “Barleywine Ale” must appear as a single cohesive designation on the label. The same policy applies to “Wheatwine Ale.”

**Note:** Other statements about gluten content are evaluated on a case-by-case basis to determine whether they are truthful and not misleading.

## NON-ALCOHOLIC:



In this example, Example Brewing Co., the brewer and bottler of the malt beverage, has submitted a COLA application for a non-alcoholic malt beverage that needs to be corrected. Malt beverages with less than 0.5% alcohol by volume must be labeled with one of the following class designations under [27 CFR 7.145](#): “malt beverage,” “cereal beverage,” or “near beer.”

### Non Alcoholic – Corrections:

1. This product cannot be labeled with a class and type designation such as “Golden Ale” or “Ale.” It must be labeled with a class designation of either “malt beverage,” “cereal beverage,” or “near beer.” It has been revised to reflect the compliant class designation of “malt beverage.”
2. As stated in the first correction, a non-alcoholic malt beverage may not be referred to with a class designation commonly applied to malt beverages with at least 0.5% alcohol by volume, such as “beer,” “lager,” “ale,” “porter,” or “stout.” This also applies to class and type references that appear as additional text, such as “...craft beer with a satisfying finish.” This has been amended by replacing “beer” with “brew” which would be an acceptable alternative. Additionally, this product cannot be described as “100% Handcrafted Beer.” “100% Handcrafted Near Beer” is an acceptable alternative.
3. This product is domestically bottled, so the statement “Nontaxable under section 5051 I.R.C.” must appear on the label. See [27 CFR 25.242](#). Additionally, the government warning statement is not required to appear on malt beverages with less than 0.5% alcohol by volume.
4. The term “non-alcoholic” may be used on malt beverages, provided the statement “contains less than 0.5 percent (or .5%) alcohol by volume” appears immediately adjacent to it, in readily legible printing, and on a completely contrasting background as seen in the compliant version of the label on the right. See [27 CFR 7.65\(e\)](#).



**NOTE:**

See malt beverage labeling regulations at [27 CFR part 7](#) (unless otherwise noted).

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**CONTACT US**

For more information on labeling, contact us at 202-453-2250 or toll free at 866-927-ALFD (2533), or send us a message using our [ALFD Contact Form](#).

See our [customer service desk information page](#) for more contact information.