

The Spirits Label from Hell:

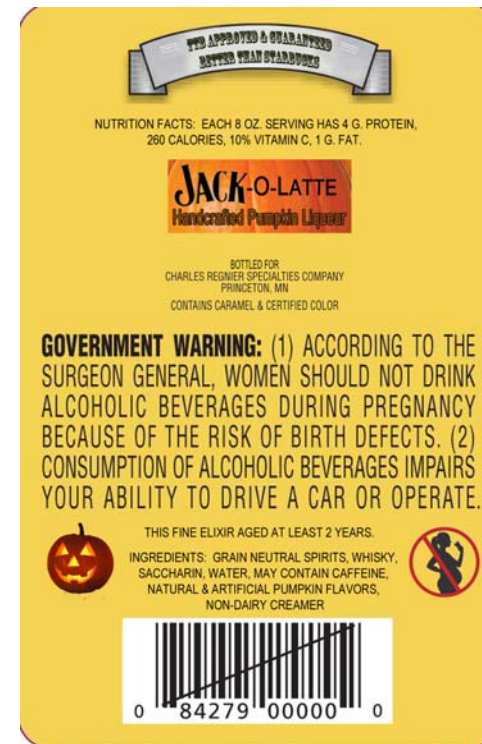
aka “This label should be easy.”



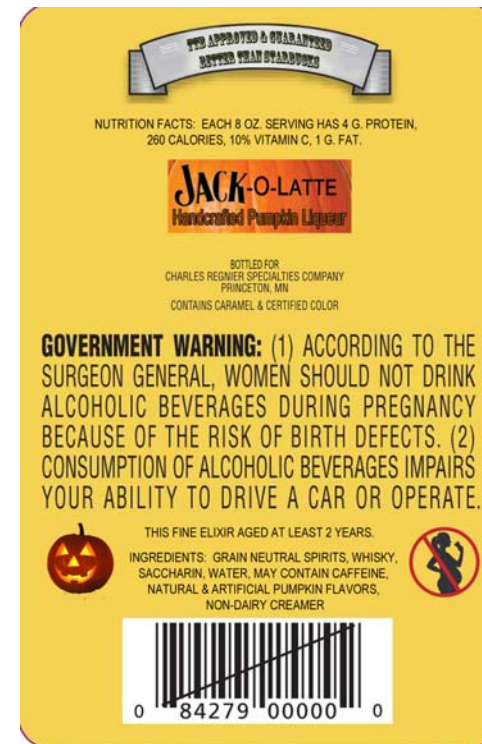
ShipCompliant Wholesale Gathering • October 16, 2014 • White Plains, NY

Robert C. Lehrman
Lehrman Beverage Law, PLLC
Washington, DC

Meet our label



How many issues can you spot?



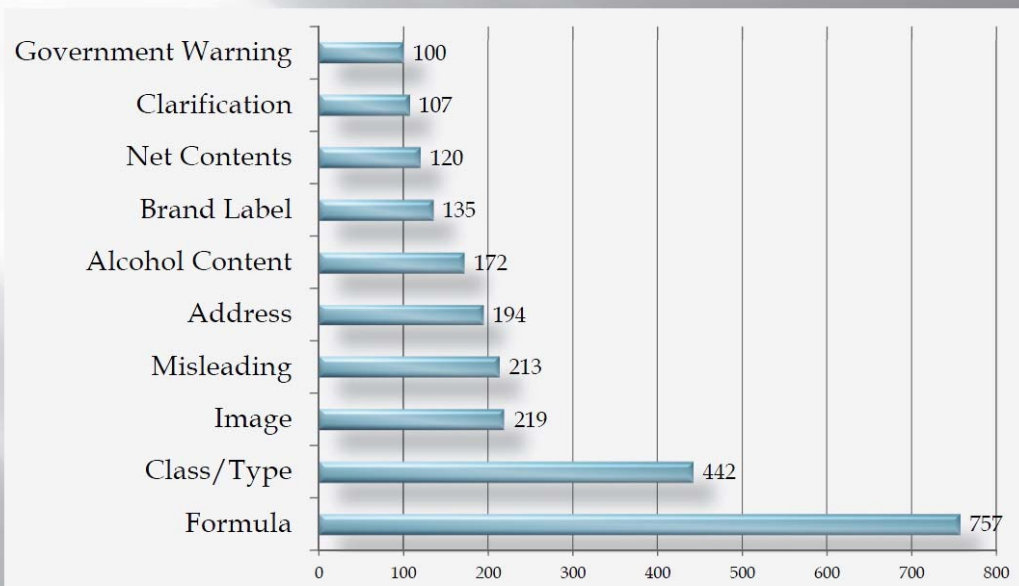
Needs Correction

Something like
43% of labels
get NC

The screenshot shows the 'COLA Registry' application form from the Alcohol and Tobacco Tax and Trade Bureau. The 'Needs Correction' section is highlighted, showing a list of reasons for correction: 'Government Warning', 'Clarification', 'Net Contents', 'Brand Label', 'Alcohol Content', 'Address', 'Misleading', 'Image', 'Class/Type', and 'Formula'. The 'Formula' category is selected, and the 'Needs Correction' status is set to 'Needs Correction'.

Labeling

Most common reasons DS labels are sent back for correction



March 2014

Alcohol & Tobacco Tax & Trade Bureau

12

1. ABV



2. Metric, SOF



3. C/T Separation



 **TTB** | **ALCOHOL AND TOBACCO TAX AND TRADE BUREAU**
U.S. Department of the Treasury

COLA Registry

ALCOHOL AND TOBACCO TAX AND TRADE BUREAU

TTB F 5100.31: Application For and Certification/
Exemption of Label/Bottle Approval

Application Needs Correction


TTB ID: 1420900
Application Status: N/A
Application Status Reason:
Date Status Last Updated: 10/10/2014 11:40:59 AM
Brand Name: DISTILLERY
Type of Product: DISTILLED SPIRIT
Source of Product: DOMESTIC
Serial #: 1400
Type of Application: LABEL APPROVAL
Date Submitted: 07/2014

[Printable Version](#)
[Make Corrections](#)
[Withdraw eApplication](#)

The Application needs correction for the reasons listed below. Click on the "Make Corrections" link above to edit the information from your original submission. All corrections must be completed by **11/09/2014** or the application will be automatically rejected.

Reason	Additional Information
The class and type must stand alone, separate and apart from other text, on the front label. Please remove the class and type from surrounding text or repeat the information so that it appears alone.	LIQUEUR must appear separate and apart (on a separate line) from any other descriptive or explanatory information per 27 CFR 5.33(b)(2).

Alcohol and Tobacco Tax and Trade Bureau, 2003 Contact us at webmaster@ttb.treas.gov



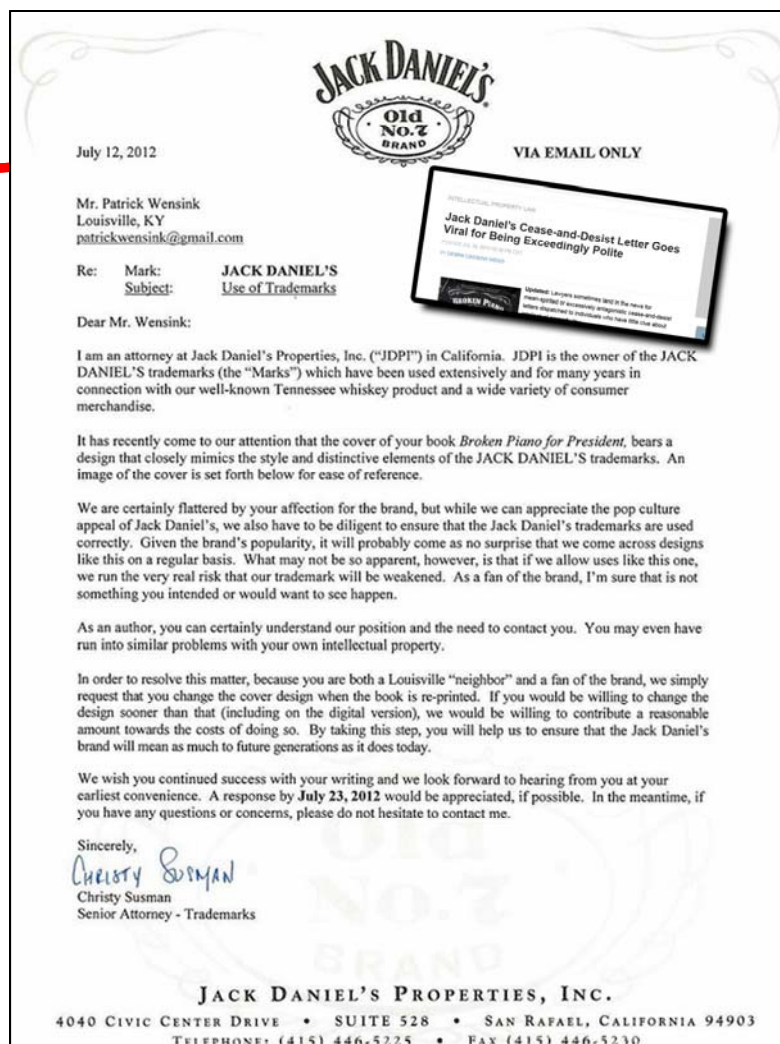
4. Formula and match



5. Misleading, Tito's



6. Trademark, Jack



7. Appeal to minors



8. Translation



9. Health claims



10. Organic



11. State of distillation, Templeton



12. Cream



13. Unexplained date



14. Needs clarification



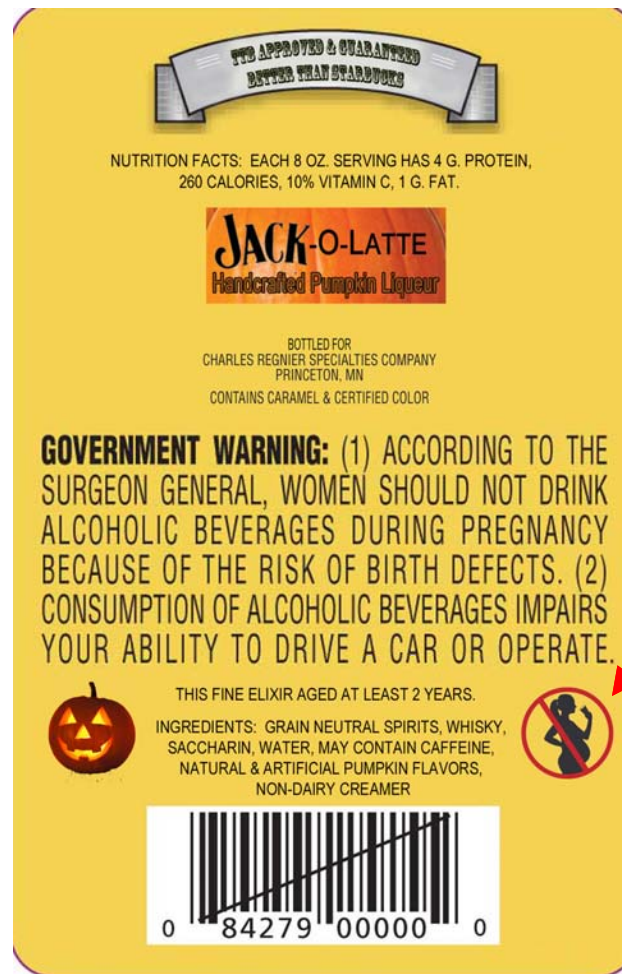
15. Misleading



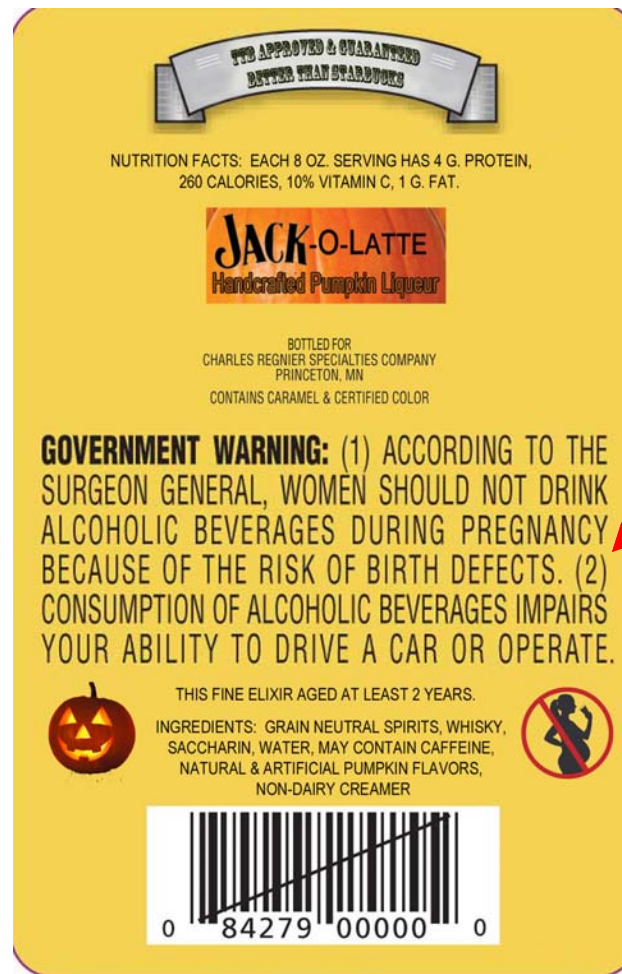
16. ® and ™



17. Pregnant lady logo



18. Bad warning



19. Guarantee, government



20. Disparaging, trademark



21. Nutrition facts, serving



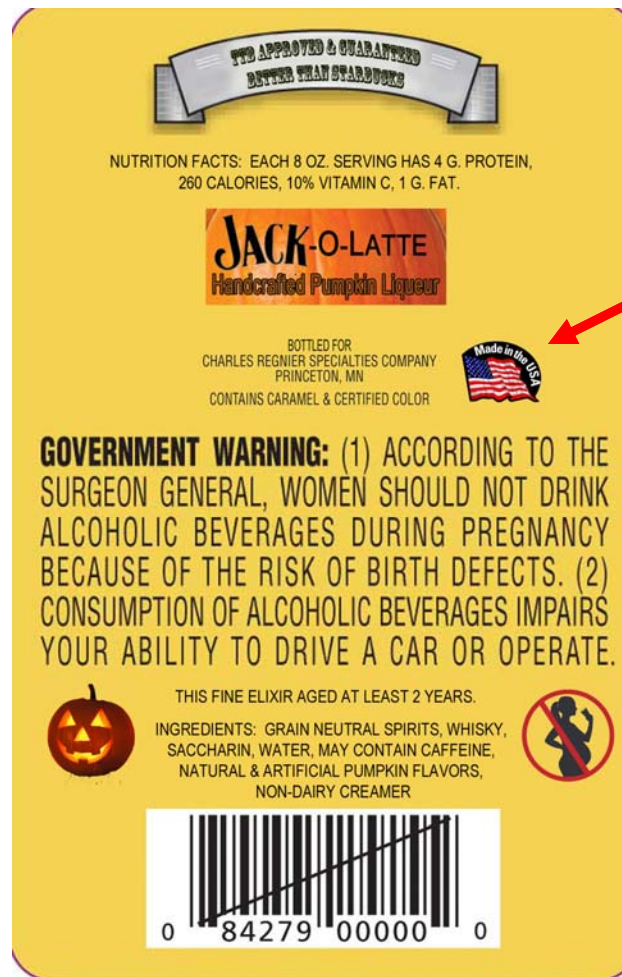
22. Sizing, legibility



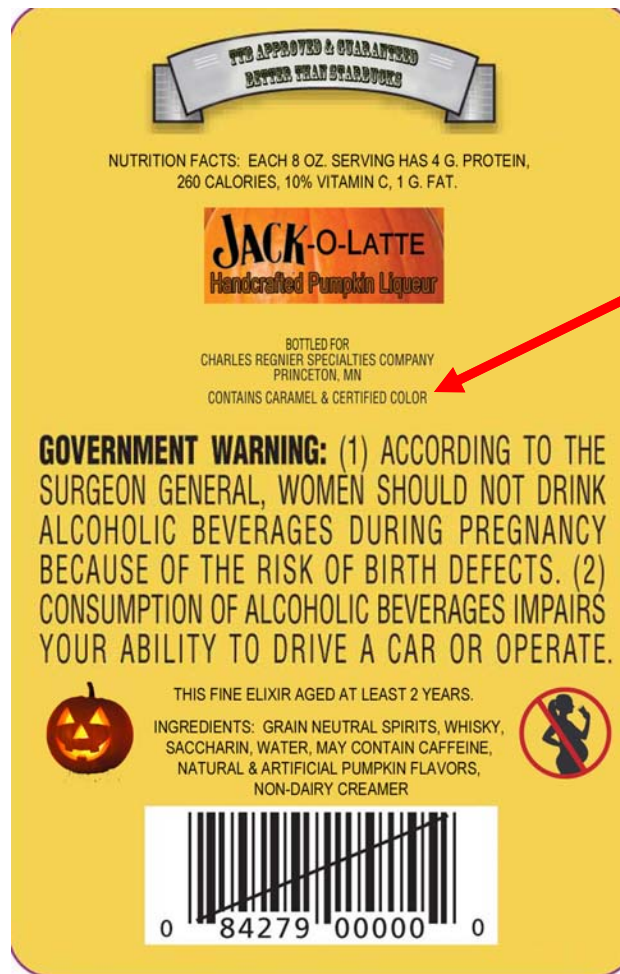
23. By and for



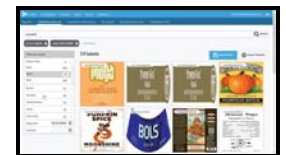
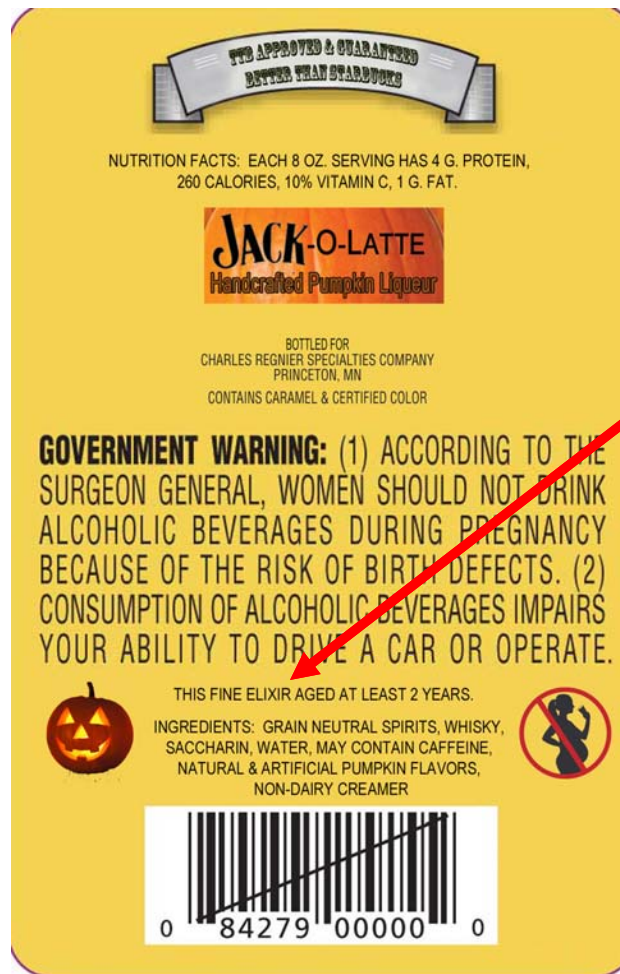
24. Flag, Made in USA



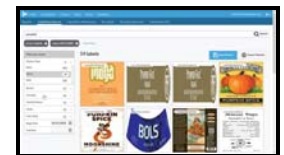
25. Colors



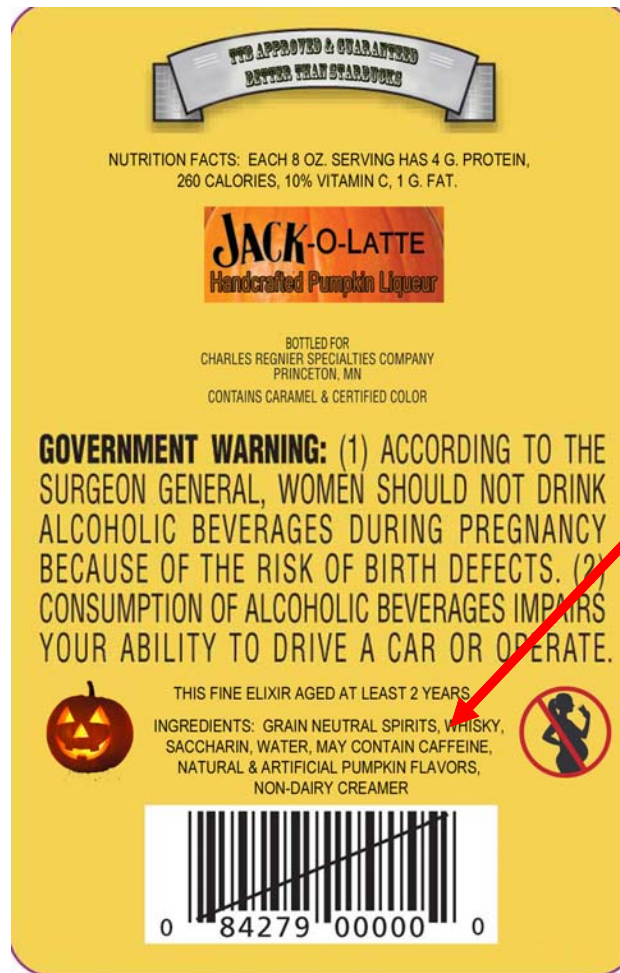
26. Elixir



27. Age



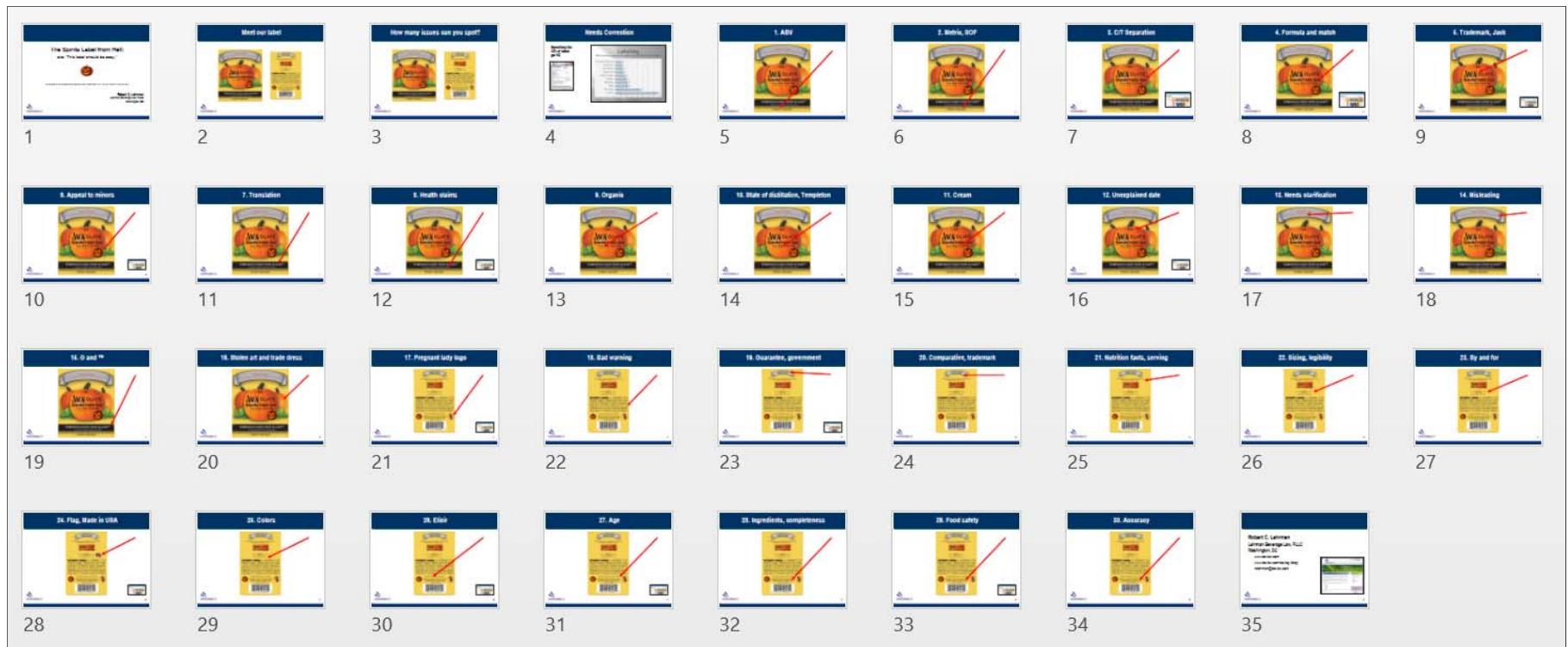
28. Ingredients, completeness



29. Food safety



Plenty of issues to keep TTB, lawyers, you, busy



Robert C. Lehrman

Lehrman Beverage Law, PLLC

Washington, DC

www.bevlaw.com

www.bevlaw.com/bevlog (blog)

rclehrman@bevlaw.com

