



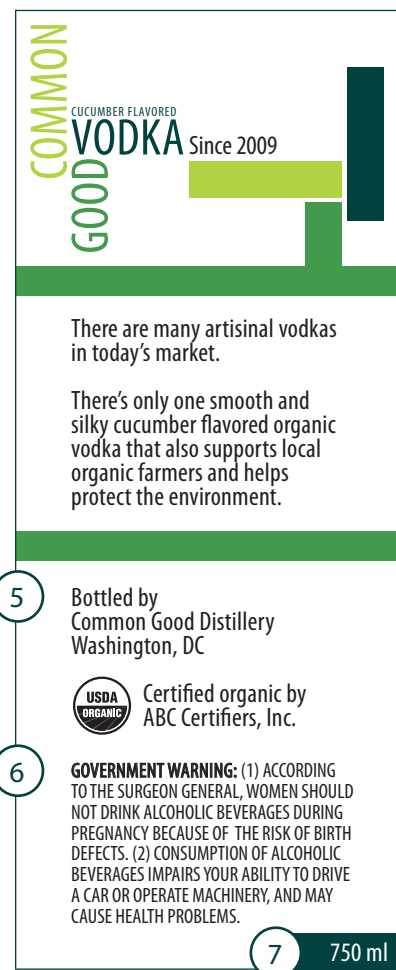
All organic alcohol beverages must meet both Alcohol and Tobacco Tax and Trade Bureau (TTB) and USDA organic regulations. TTB requires that alcohol beverage labels be reviewed through the Certificate of Label Approval (COLA) application process. Learn more at <https://www.ttbonline.gov/colasonline>.

Organic-specific labeling requirements will be described in the subsequent pages.

Required Elements of a Spirits Label

- 1 Brand name
- 2 Class/type (vodka, gin, etc.)
- 3 Commodity statement
- 4 Alcohol content
- 5 Name and address statement
- 6 Health warning statement
- 7 Net contents

For specific requirements related to each of these elements, other requirements, and information on labeling imported products, visit www.ttb.gov.





Requirements for spirits making organic claims. In addition to TTB requirements, the USDA organic regulations describe the specific production and handling requirements for the three main categories of organic labeling claims. For each category (described on subsequent pages), these regulations dictate the spirits’ composition, as well as how and when spirit labels may make organic claims.

Organic oversight. The USDA accredits third-party certifiers (ACAs) to assess organic operations’ compliance with the USDA organic regulations. The table below outlines some of the key requirements for each labeling category (learn more at www.ams.usda.gov/nop):

	“Organic”	“Made with Organic ****”	Other
Overseen by certifier/ACA?	Yes	Yes	No*
USDA organic seal or foreign equivalent allowed?	Yes	No	No
Organic claims allowed in addition to ingredient statement?	Yes	Yes	No
All agricultural ingredients required to be certified organic?	Yes, unless specifically allowed per National List	No, but product must be at least 70% organic	No
Organic yeast required?	Yes, unless not commercially available	No	No
Ingredients produced using prohibited methods (e.g., genetic engineering) allowed?	No	No	Yes

*For spirits not in the “organic” or “made with organic ****” labeling categories ONLY: COLA application must include organic certificates (“crop reports”) for any specific ingredients identified as “organic” on the label.

Certifier/ACA + COLA review. To ensure compliance with both TTB and USDA organic regulations, a certified operation’s alcohol labels must be approved through the following steps prior to sale of the organic alcohol product:

1. Certifier/ACA reviews the alcohol label(s) to assess compliance with USDA organic regulations.
2. Certifier/ACA stamps/signs label(s), verifying compliance with USDA organic regulations.
3. TTB permittee (importer or organic operation) completes the COLA application.
4. TTB permittee submits COLA application and label(s) approved by the certifier/ACA to TTB.
No longer requires a copy of the organic certificate. <http://bit.ly/ttb-documentation>

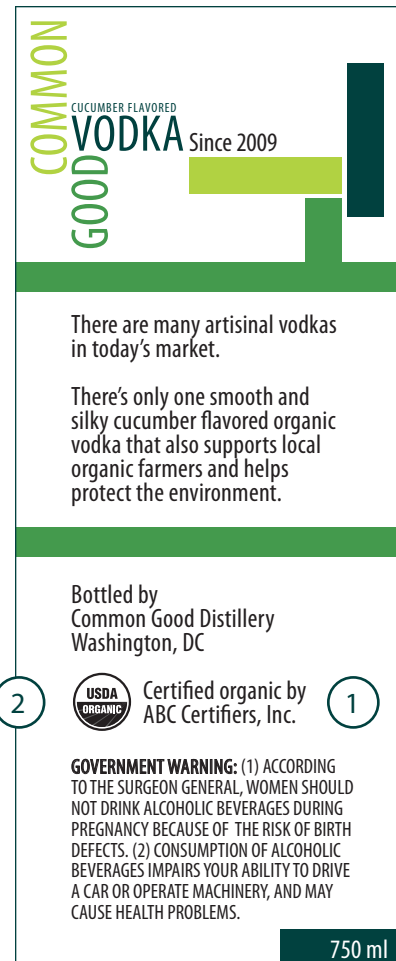
Trade considerations. USDA has trade partnerships with multiple countries. These partnerships allow organic products certified in one country to be sold as organic in the other. Regardless of country of origin, traded products must meet the labeling requirements in the destination country and any other terms of the arrangement. Therefore, a spirit produced and sold in a foreign country typically has a separate label if it is also imported to the United States.

To learn more about specific trade partnerships, visit www.ams.usda.gov/NOPIInternationalAgreements.



Labeling Category: “Organic”

Spirits in the “organic” labeling category must be overseen by a certifier/ACA, who will verify that the spirits meets all appropriate specifications in the USDA organic regulations. All agricultural ingredients (e.g., grains, agricultural flavoring agents, etc.) must be certified organic except per the National List of Allowed and Prohibited Substances. Any non-agricultural ingredients must be specifically allowed on the National List and may not exceed a combined 5 percent of the total product (excluding salt and water). Below is an example of an acceptable label for spirits meeting all requirements in the “organic” category:



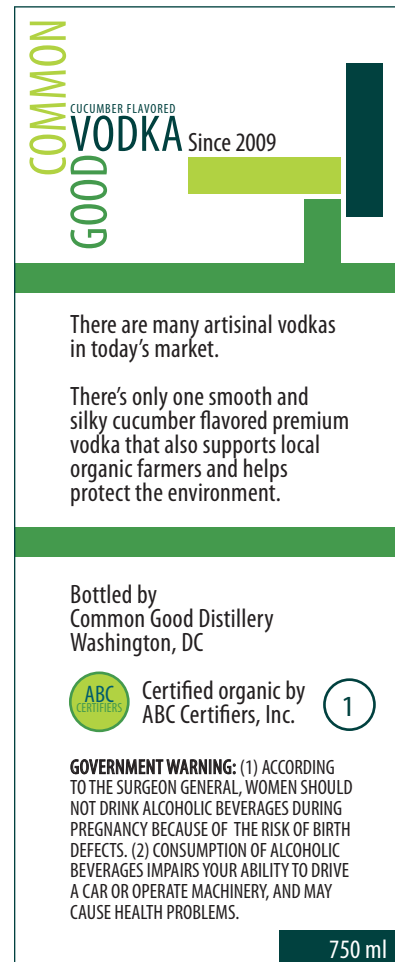
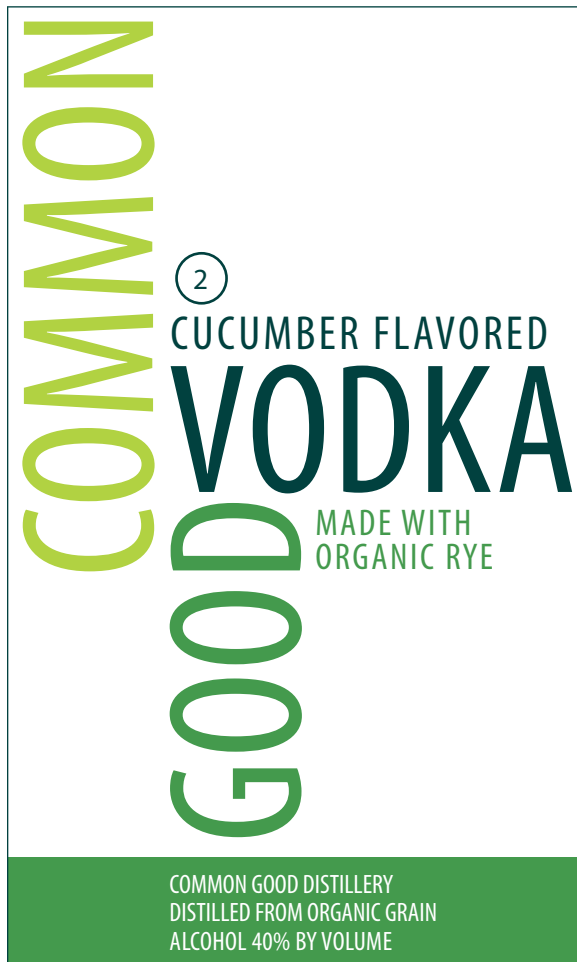
Why the label is acceptable

1. **Certifier/ACA.** The certifier/ACA is listed below the bottler or distributor (certified organic by ***). Before being submitted to TTB, this certifier/ACA has reviewed the label and verified that the spirits meets all requirements for the “organic” labeling category.
2. **Organic seal.** For “organic” spirits, the USDA organic seal (or foreign equivalent if authorized under an equivalency arrangement with the United States) may be used anywhere on the label.



Labeling Category: “Made With” Organic ***”

Spirits in the “made with” labeling category must be overseen by a certifier/ACA, who will verify that the spirits meet all appropriate specifications in the USDA organic regulations. At least 70 percent of the ingredients must be certified organic, but other agricultural ingredients (e.g., flavoring agents) aren’t required to be organic. Non-agricultural ingredients must be specifically allowed on the National List. Below is an example of an acceptable label for spirits meeting all requirements in the “made with organic ***” category:



Why the label is acceptable

- 1. Certifier/ACA.** The certifier/ACA is listed below the bottler or distributor (certified organic by ***). Before being submitted to TTB, this certifier/ACA has reviewed the label and verified that the spirits meet all requirements for the “made with organic ***” labeling category.
- 2. Organic claims.** The USDA organic seal (or foreign equivalent) isn’t anywhere on the label. All words in the statement, “made with organic rye,” are formatted the same (and no more than half the size of the largest text on the label). The certifier/ACA’s logo may be present anywhere.

Note: Unlike the example on the previous page, the vodka itself can’t be described as “organic”; instead, it is vodka made with organic rye. This has been edited appropriately in the product’s description above.



Labeling Category: Not “Organic” or “Made With Organic ****”

If the distilled spirit doesn’t meet the requirements of the “organic” or “made with organic ****” labeling categories, it isn’t eligible for organic certification. The distiller/bottler must obtain copies of individual ingredients’ organic certificates (“crop reports”) and submit them to the TTB along with the COLA application.

Examples of attributes that would disqualify spirits from certification, meaning the spirits couldn’t be in the “organic” or “made with organic grapes” labeling category categories:

- Spirits contains less than 70 percent certified organic content
- An ingredient was produced through genetic engineering or other prohibited methods

Uncertified spirit labels must not use the USDA organic seal (or foreign equivalent) anywhere on the label. The ingredient statement can identify any certified organic ingredients as organic; if the ingredient statement is present, the label may also state the percentage of certified organic ingredients. All other organic claims are prohibited. Below is an example of an acceptable spirits label in this category:



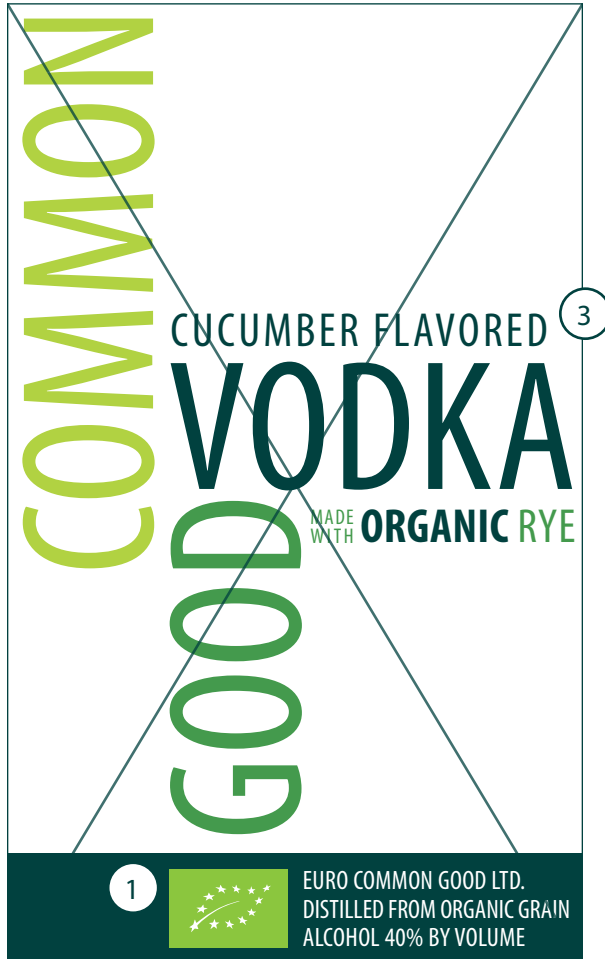
Why the label is acceptable

1. The USDA organic seal isn’t present on the label, and organic claims are limited to the ingredient statement.
2. Since the voluntary ingredient statement is present, the percentage of organic ingredients claim is acceptable.

To increase labeling compliance, here are two examples of unacceptable labels we've seen and how to correct them.

Unacceptable Labels: Example 1

A certifier/ACA confirms that this vodka contains water, organic rye (96%), cucumber (3.5%) and yeast (0.5%).



Why is the label unacceptable?

1. In the “organic” category, all agricultural ingredients must be certified organic except per the National List. This vodka contains non-organic cucumber and yeast; the cucumber must be certified organic and yeast must be certified organic unless it is not commercially available in organic form. Therefore, this vodka isn't eligible for the “organic” category and the European Union (or USDA) organic logo can't be used anywhere on the label.
2. The certifier/ACA's full name isn't included.
3. In the “made with organic rye” statement, words must be formatted the same (and no more than half the size of the largest text on the label).

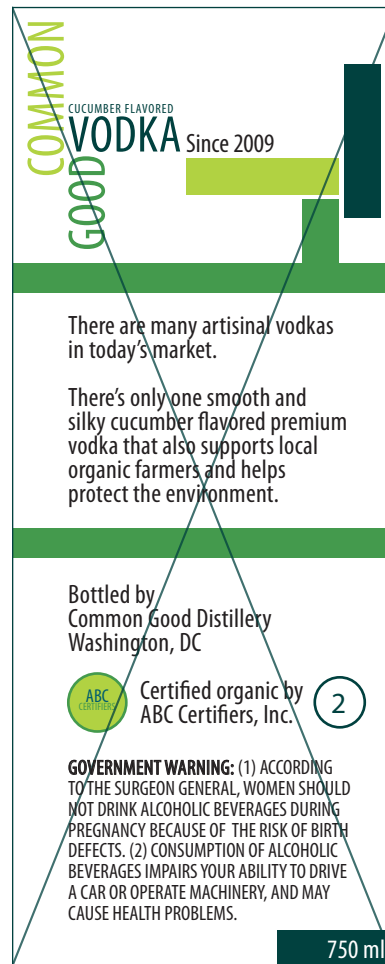
How can I correct it?

1. Remove the European Union organic logo from the label.
2. Identify the certifier/ACA (“certified organic by ****”), spelling out the certifier/ACA's full name (not just the code assigned by the European Union).
3. Reformat the “made with organic rye” statement so that all words are formatted the same.



Unacceptable Labels: Example 2

Testing confirms that this vodka contains water, organic rye (96%), organic cucumber (3.4%), and yeast (0.6%). The finished vodka isn't overseen by a certifier/ACA.



Why is the label unacceptable?

1. While the rye/grain and the cucumber are certified organic, the finished vodka isn't overseen by a certifier/ACA. Therefore, you can only make organic claims in the ingredient statement (see page 5).
2. Since the finished product isn't overseen by a certifier/ACA, a certifier/ACA's name or logo can't be on the label.

How can I correct it?

1. Change the commodity statement to "distilled from grain" and change "flavored with organic cucumber" to "cucumber flavored."
2. Remove the "certified organic by ***" statement, as well as the certifier/ACA's logo.

If the label includes an optional ingredient statement, it can also state, "contains 99 percent organic ingredients" below the ingredient statement.