

## PRACTICAL ADVICE

# COLA SUBMISSIONS MADE EASIER

For craft brewers, navigating the complex world of federal and state regulatory approvals can be a frustrating process. In the first quarter of 2017, more than half of all labels submitted to the Alcohol and Tobacco Tax and Trade Bureau (TTB) were rejected for corrections. This means spending more time on design revisions, resubmitting labels, and, possibly, delays in getting products to market. Here are five basic tips to help avoid having your labels rejected by the TTB. **BY ANDREW ZENDER, THE BEER LABEL GUY**

### ALCOHOL CONTENT

There are a handful of ways to state the alcohol content of your product, and the everyday expression “ABV” isn’t one of them. But that’s the term we all use in conversation, right? Even though most of us simply say “ABV” when talking about how much boozy punch we can expect to get out of our favorite imperial stout or how “sessionable” an IPA is, the TTB doesn’t accept the everyday abbreviation as an adequate way of stating alcohol content. Instead, try “Alc./Vol.” with the percentage in front (e.g., “6.5% Alc./Vol.”).

### CLASS AND TYPE/COMPOSITION STATEMENT

In this exciting period where craft brewers are pushing the envelope with their beers and ingredients, things can get muddy with label approvals. But one thing is clear: Properly identifying a beer’s class and type is key to getting a label approved. For example, although “IPA” is an everyday term that’s about as common as hops are in an IPA, it won’t work by itself on a label, per TTB standards. You can still use “IPA” as part of your brand/beer name; just be sure to include “India Pale Ale” elsewhere on the label. Even “Ale” will suffice. But make sure it meets type size and legibility requirements (more on that in a moment).

In addition, once you get into using ingredients other than water, malt, hops, and yeast, adjunct ingredients must be properly identified in a composition statement, depending on when and how

they’re introduced into the beer. Planning to have a coffee porter or peach beer in your lineup? You can call it that on your label, so long as the composition statement explains it—for example, *Coffee Porter or Porter with Coffee Added*; *Peach Ale* or *Ale Brewed with Peaches*.

### TYPE SIZE AND LEGIBILITY

Get creative with your branding and graphic design, but don’t get so carried away that you fail to meet type size and legibility requirements for all mandatory information. What exactly does that mean? All mandatory information on a label, excluding alcohol content and health warning statement, must

- be at least 2mm high for containers larger than a half pint (8 fl oz);
- be readily legible;
- appear on a contrasting background;
- appear separate and apart from, or be substantially more conspicuous than, descriptive or explanatory information.

To put it simply: if you think an element of your label might be unclear to the TTB, it probably is. Design your labels so each piece or section of mandatory information is easy to read and easily identifiable.

### NET CONTENTS

Whether it’s in bottles, cans, or kegs, beer comes in many different package sizes—bombers, 12s, tallboys, the “stovepipe” can, half-barrels, and sixth-barrels, to

name a few. When identifying the net contents of your product, American units of measure are most common, but metric measure also is accepted. Depending on the size of the container, use fluid ounces, pints, gallons, and fractions thereof.

### NOTES FOR THE SPECIALIST

The TTB wants to minimize or eliminate potential consumer confusion when it comes to the overall branding and design of alcohol products. While the name you’ve chosen for your beer/brand and the design you’ve used to represent it may be clear to you, it may not be to a TTB label review specialist, and therefore, to a consumer. In fact, just assume it isn’t. Take the time to write a concise, compelling statement that explains the beer’s name, label design and color, and the overall marketing strategy behind the brand and include it in the notes to the specialist during the COLA application process.

### IN CLOSING

One final piece of advice: take a look at some of your favorite beers on the shelf, particularly those from outside your home market. They all had to meet federal requirements to get there. Find inspiration from your fellow breweries. 

*Andrew Zender, The Beer Label Guy, offers consulting and process management services to the beer industry for TTB COLA registration, state brand and label registrations, and state license applications. For more information, visit [thebeerlabelguy.com](http://thebeerlabelguy.com).*