



# TTB'S PROPOSED CHANGES

ALCOHOL LABELS TO FEATURE CONTENT, ALLERGEN, AND NUTRITION DETAILS



Two Notices of Proposed Rulemaking (NPRMs) were published on

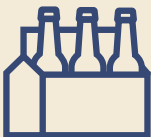
JANUARY 17TH, 2025

regarding labeling of alcoholic beverages regulated by the federal Alcohol and Tobacco Tax and Trade Bureau (TTB) under the Federal Alcohol Administration Act (FAA Act).



The **first** NPRM focuses on the labeling of alcohol content and nutrition information in the form of “Alcohol Facts” statement.

The **second** NPRM focuses on declaration of major allergens.



TTB IS PROPOSING A PHASE-IN TIMELINE OF

5 YEARS

THE NEW PROPOSAL WOULD ALLOW CHANGES TO THE LABEL WITHOUT REQUIRING A NEW FEDERAL CERTIFICATE OF LABEL APPROVAL (COLA) – A PROCESS SPECIFIC TO TTB REGULATED PRODUCTS.

## PROPOSED “ALCOHOL FACTS” – NOTICE NO. 237



DICTATES NUTRIENT DISCLOSURES ON MOST BEERS WHICH QUALIFY AS MALT BEVERAGES AND REQUIRE ALCOHOL CONTENT FOR ALL BEER



PROPOSED FORMAT IS A PANEL (SIMILAR TO FDA FORMAT) OR LINEAR DISPLAY (CAN BE DISPLAYED AS TEXT WITH SOME SPECIFIC REQUIREMENTS)

## PROPOSED COMPONENTS

**Serving Size** Malt Beverages “standard serving size”  
< 7% ABV – 12 oz  
7-16% ABV – 5 oz  
> 16% – potentially 1.5 or 2.5 oz

**Servings per Container** Containers between 100-200%  
Alcohol Facts must be per container  
Containers > 200%  
Alcohol Facts can be multi-serving container

**Alcohol Content** Listed in oz of pure alcohol per serving to the nearest 1/10 oz with a ± 1% tolerance for products > 0.5% ABV  
> 40 oz packages – font size must be ≤ 4mm  
< 40 oz packages – font size must be ≤ 3mm

**Nutrition Content**  
**Calories per serving**  
> 50 calories per serving – declared to nearest 10 calories  
< 50 calories per serving – declared to nearest 5 calories  
± 20% tolerance  
**Protein & Carbohydrates**  
Declared to nearest gram  
± 20% tolerance  
**Total Fat**  
> 5g per serving – declared to nearest gram  
< 5g per serving – declared to nearest half gram  
± 20% tolerance

## EXEMPTIONS

HARD SELTZERS NOT MADE WITH MALTED BARLEY OR HOPS (FDA’S AUTHORITY)

WINES < 7% ABV (FDA’S AUTHORITY)

PRODUCTS THAT DO NOT CROSS STATE LINES



## PROPOSED ALLERGEN DECLARATIONS – NOTICE NO. 238

Require mandatory disclosure of the nine major allergens on the label:

MILK	FISH	TREE NUTS
EGGS	CRUSTACEANS	PEANUTS
SOYBEANS	WHEAT	SESAME

Would apply to all malt beverages and distilled spirits, and most wines

## ALLERGEN DISCLOSURE ON THE LABEL

CONTAINS MAJOR FOOD ALLERGEN(S): \*INSERT LIST OF ALLERGENS HERE\*

MUST ALSO LABEL “INCIDENTAL ADDITIVES” THAT ARE CONSIDERED

ALLERGENS (I.E. USED DURING PROCESSING BUT NOT NECESSARILY IN THE FINAL PRODUCT)

CAN INCLUDE COMMENTS IN PARENTHESIS NOTING THAT THESE ALLERGEN(S) ARE USED AS PROCESSING AIDS, ETC.