

JUSTIFICATION

TTB F 5100.31 - Application for and Certification/Exemption
of Label/Bottle Approval

1513-0020

This form is used to submit beverage alcohol labels to TTB for approval, and is also known as a Certificate of Label Approval (COLA). There is a pre-COLA analysis that must be conducted prior to approval of the COLA. Various terms for pre-COLA analysis, such as lab analysis, pre-import, statements of process (SOP), and formula are being consolidated. All of the terms in items 10 and 11 are now referred to as "formula." As such, **item 11** will now be titled "Formula." Since the formula information will be consolidated in item 11, a vacancy will be left in item 10. For some time, TTB has wanted to gather grape varietal information from labels; however, the opportunity had not previously presented itself. We would like to entitle **item 10** as, "Grape Varietal(s) *Wine only*". The collection of this data will be beneficial to national and international communities. The instructions for items 10 and 11 are also being changed. We do not believe that these changes will affect the burden, and request that they be approved as a nonmaterial change.