


# COLAs Online Screen Shots

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### Allowable Changes to Approved Labels

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TTB COLAS Version 3.11.17

**The List of Allowable Revisions to Approved Labels shown below is the updated list that will be included in Part V of the revised paper form, TTB F 5100.31.**

**Complete List of Allowable Revisions To Approved Labels**

Once a label receives TTB approval, you can make certain changes to that label without obtaining a COLA from TTB. Any revision(s) you make to your approved label(s) must be in compliance with the applicable regulations in 27 CFR parts 4, 5, 7 and 16, and any other applicable provision of law or regulation, including, but not limited to, the conditions described in the "Comments" section of the chart below.

YOU MAY...	REVISION APPLIES TO			COMMENTS
	WINE	DISTILLED SPIRITS	MALT BEVERAGE	
1. Delete any non-mandatory label information, including text, illustrations, graphics, etc.	YES	YES	YES	
2. Reposition any label information, including text, illustrations, graphics, etc.	YES	YES	YES	The repositioning must comply with any placement requirements applicable to mandatory information. For example, some types of mandatory information must appear on the brand label or must appear together with other label information.
3. Change the color(s) (background and text), shape and proportionate size of labels. Change the type size and font, and make appropriate changes to the spelling (including punctuation marks and abbreviations) of words, in compliance with the regulations. Change from an adhesive label to one where label information is etched, painted or printed directly on the container and vice versa.	YES	YES	YES	All mandatory information must be readily legible and appear on a contrasting background. If you received approval for a single label then you may not divide the label into multiple labels without reapproval. All changes must comply with applicable regulations, and changes in spelling must not change the meaning of the previously approved information.
4. Change the stated percentages for blends of grape varietals and appellations of origin for wine labels.	YES	N/A	N/A	When used for any of these items, the total percentages for each element must equal 100%. You may not change the name of the stated varietals or appellations without submitting a new application.
5. Add, change or delete a vintage date for wine labels.	YES	N/A	N/A	If the vintage date is deleted, no reference to "Vintage" may be made on any label or other materials (e.g., caps, capsules, corks, etc.) affixed to the bottle. When adding a new vintage date, you must comply with all applicable regulations, including the requirements regarding appellations of origin.
6. Change the optional "produced" or "made" by statements on wine labels to "blended", "vinted", "cellared" or "prepared" by statements.	YES	N/A	N/A	
7. Add, change or delete the stated amount of acid and/or the pH level for wine labels.	YES	N/A	N/A	
8. Change the stated amounts of sugar at harvest and/or residual sugar for wine labels.	YES	N/A	N/A	See ATF Ruling 82-4 for policy regarding use of sugar content statements and when such statements are required.



9. Add or delete bonded winery or taxpaid wine bottling house number for wine labels.	YES	N/A	N/A	If used, a bonded winery number must appear in direct conjunction with the bottler's name and address.
10. Change the net contents statement.	YES	YES	YES	Revisions must comply with all applicable regulations governing net content statements and standards of fill. Please ensure that all applicable type size requirements are met for each container size.
11. Change the mandatory statement of alcohol content, as long as the change is consistent with the labeled class and type designation, and all other labeling statements.	YES	YES	YES (Flavored Malt Beverages Only)	For example, you may change the alcohol content of a grape wine labeled with a varietal designation from 13 percent to 15 percent alcohol by volume, even though it results in a change to the product's tax classification.  However, if the product was designated and labeled as a "table wine," an alcohol content of 15 percent alcohol by volume would be inconsistent with the rules for use of that designation, so this change would not be permitted.  Similarly, a label bearing a "rum" designation may not be changed to state an alcohol content of less than 40 percent alcohol by volume. The revised alcohol content statement must be consistent with all other mandatory or optional labeling statements.
12. Add, delete, or change an optional statement of alcohol content for malt beverage labels.	N/A	N/A	YES	Malt beverages that contain alcohol derived from added flavors or other added nonbeverage ingredients (other than hops extract) containing alcohol are subject to mandatory alcohol content statement requirements.
13. Change the statement of percentage of neutral spirits and the name of the commodity from which a distilled spirit is produced.	N/A	YES	N/A	These changes must not result in a change to the class or type designation of the distilled spirits product.
<a href="#">↶ Back to top</a>				
14. Change the mandatory age statement, or delete or change an optional age statement for distilled spirits labels.	N/A	YES	N/A	These changes must not result in a change to the class or type designation. See 27 CFR 5.22 and 5.40 for further information about age statements and minimum aging requirements applicable to certain classes and types of spirits.
15. Delete or change an optional age statement, including a barrel aging statement, for wine and malt beverage labels.	YES	N/A	YES	Statements of age on wine labels must comply with 27 CFR 4.39(b).
16. Add, delete, or change statements or information in order to comply with the requirements of the State in which the malt beverage is to be sold.	N/A	N/A	YES	Applies only to malt beverages sold in that particular State.
17. Change the numerical values for calories, carbohydrates, protein, and fat contained in a statement of average analysis.	YES	YES	YES	Changes must be in compliance with TTB Ruling 2004-1.

18. Add, delete, or change stated bottling date, production date (day, month, and/or year) or freshness information including bottling, production or expiration dates or codes.	YES	YES	YES	Bottling dates added to wine labels must comply with 27 CFR 4.39(c).
19. Change the name or trade name to reflect a different name already approved for use by the responsible bonded wine cellar, taxpaid wine bottling house, distilled spirits plant, brewery, or importer. Change the address where it is within the same State.	YES	YES	YES	This means that a bonded wine cellar, taxpaid wine bottling house, distilled spirits plant, brewery or importer may revise the label to include the use of a name or trade name that is already approved for that particular industry member. The name or trade name must appear on the basic permit, brewer's notice, or other qualifying documents for the company to whom the original certificate was issued. If the name or trade name is also used as the brand name on the label, resulting in a change of brand name, you must submit a new application. The change in address is ONLY allowed for in-state moves or other changes to the COLA holder's address that have already been reflected on the industry member's basic permit, brewer's notice, or other qualifying documents.
20. Add, delete, or change the name and/or address of the foreign producer, bottler, or shipper.	YES	YES	YES	The producer, bottler, or shipper must be located in the same country originally shown.
21. Add, delete, or change the name, address, and/or trademark of the wholesaler, retailer, or persons for whom the product is imported or bottled.	YES	YES	YES	
22. Add, delete, or change bottle deposit information.	YES	YES	YES	
23. Add, delete, or change UPC barcodes and/or 2D mobile barcodes, e.g., QR codes or Microsoft Tags.	YES	YES	YES	Addition or change of UPC Code must be in compliance with Industry Circular 77-23. Any information retrieved from 2D barcodes must be in compliance with all applicable advertising regulations.
24. Add, delete, or change a Web site address, phone number, fax number, or zip code.	YES	YES	YES	
25. Add, delete, or change a lot or batch identification number or other serial numbers.	YES	YES	YES	
26. Add, delete, or change trademark, copyright symbols (e.g., TM, ©, ®), kosher symbols, company logos, and/or social media icons.	YES	YES	YES	Symbols, logos and icons may not violate TTB regulations. Advertisements on social media sites must be in compliance with all applicable advertising regulations.
27. Add, delete, or change optional information about awards or medals.	YES	YES	YES	



28. Add, delete, or change holiday- and/or seasonal-themed graphics, artwork and/or salutations.	YES	YES	YES	Holiday/seasonal-themed information or graphics must not conflict with or qualify the mandatory information and must comply with all applicable regulations, including the rules governing prohibited practices.
29. Delete or change promotional sponsorship-themed graphics, logos, artwork, dates, event locations and/or other sponsorship-related information (e.g., sports leagues, team organizations, annual sporting events, and annual or semi-annual festivals).	YES	YES	YES	If authorization by a third party was required for use of such promotional sponsorship-themed information on a label when first approved, it is the responsibility of the industry member to have any necessary documentation of authorization to cover the revisions to the approved label(s).
30. Add, delete, or change a label or sticker that provides information about a rating or recognition provided by an organization (e.g., "Recognized as one of the top values in vodka by x Magazine" or "Rated as the best 2012 wine by x Association"), as long as the rating or recognition reflects simply the opinion of the organization and does not make a specific substantive claim about the product or its competitors.	YES	YES	YES	These statements or graphics must not conflict with or qualify any mandatory information and must comply with all applicable laws and regulations. Substantive claims about the product or its competitors are not covered by this exemption.
31. Delete all organic references from the label.	YES	YES	YES	If you choose to delete one organic claim on a label on which you have received approval to make organic claims, then all organic claims, references, and certification statements must be deleted on the revised label. The deletion of individual references or certification statements is not permitted without a new COLA.
32. Change an approved sulfite statement to any of these options: "Contains Sulfites," "Contains (a) Sulfiting Agent(s)," "Contains [name of specific sulfating agent]," "Contains Naturally Occurring and Added Sulfites," or "Contains Naturally Occurring Sulfites."  "Sulphites" may be used in lieu of "Sulfites."	YES	YES	YES	A sulfite statement is required when sulfur dioxide or a sulfiting agent is detected at a level of 10 or more parts per million, measured as total sulfur dioxide. The statement used must accurately reflect all of the sulfur dioxide or sulfiting agent(s) present in the alcohol beverage. For wine: Any other variation of the statement or removal of the statement requires a lab analysis. For sulfite waivers, the proprietor must have proof of sample analysis from a TTB-certified laboratory or from the TTB Compliance Laboratory.
33. Add, delete, or change information about the number of bottles that were "made," "produced," "brewed," or "distilled" in a batch; respectively.	YES	YES	YES	Example: "100 bottles produced."
34. Add certain instructional statements to the label(s) about how best to consume or serve the product. Only the statements listed in the comments section may be added.	YES	YES	YES	<b>Only</b> the following statements are approved to be added to a label: <i>"Refrigerate After Opening"</i> <i>"Do Not Store In Direct Sunlight"</i> , <i>"Best If Frozen For ___ to ___ Hours"</i> , <i>"Shake Well"</i> , <i>"Pour Over Ice"</i> , <i>"Best When Chilled"</i> , <i>"Best Served Chilled"</i> , <i>"Serve Chilled"</i> , <i>"Serve at Room Temperature"</i>



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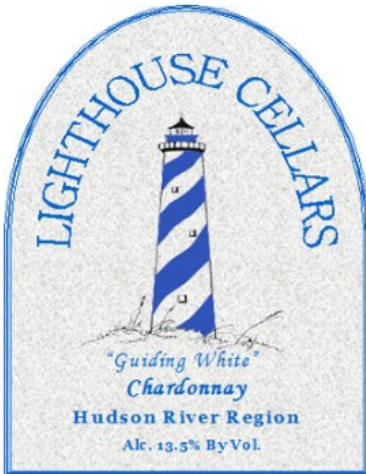
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### Examples of Labels with Allowable Changes

The following sample labels illustrate examples of changes you are allowed to make to your approved label without obtaining a COLA from TTB. The item numbers below correspond with the numbers on the Complete List of Allowable Revisions found on pages 3 and 4 of the COLA form (TTB Form 5100.31).

These are examples of revisions allowed in the context of *these specific labels*. Review the complete list of allowable revisions and applicable conditions for more information about each change. A picture can be worth a thousand words! Use the Allowable Changes Sample Label Generator tool which illustrates examples of approved labels.

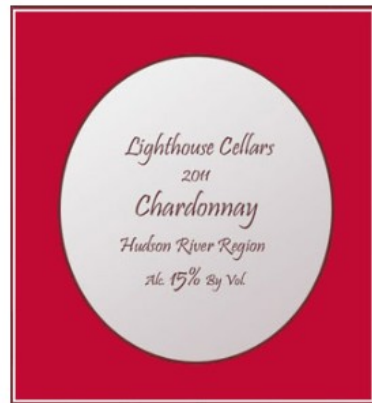
#### Approved Brand Label



In this example, we made the following changes ("allowable revisions") to the approved brand label:

- Removed lighthouse illustration (item 1)
- Removed fanciful name "Guiding White" (item 1)
- Changed shape of label (item 3)
- Changed color of background and fonts (item 3)
- Added a vintage date (item 5)
- Changed alcohol content statement (item 11)

#### Approved Brand Label With Allowable Changes (No Need To Obtain COLA)



#### Approved Back Label



In this example, we made the following changes ("allowable revisions") to the approved back label:

- Removed lighthouse illustration (item 1)
- Changed shape of label (item 3)
- Changed color of background and fonts (item 3)
- Changed "Produced by" to "Vinted by" (item 6)
- Changed net contents statement (item 10)
- Changed address within same state (item 19)
- Added a QR Code (item 23)

#### Approved Back Label With Allowable Changes (No Need To Obtain COLA)





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The link circled above goes to the List of Allowable Revisions to Approved Labels, which is Part V on the paper form, TTB F 5100.31, and it will be updated as shown above to match the updated paper form.





## COLAs Online

ALCOHOL AND TOBACCO TAX AND TRADE BUREAU

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### Allowable Changes to Approved Labels

#### Did You Know You Can Make Certain Changes to Your Labels Without Obtaining a New Certificate of Label Approval (COLA)?

If you are considering making changes to previously approved labels, please review the [complete list of allowable revisions](#) **before** you submit your COLA application; you may not need to send us the revised labels at all!

- [Examples of Labels with Allowable Changes](#)
- [Complete List of Allowable Revisions To Approved Labels \(Printer-Friendly Version\)](#)
- [Webinar Presentation: Allowable Revisions To Approved Labels](#)

Yes, I have read the list of allowable revisions

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**(Webinar Guidance format is also available to online users)**



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**User must "Acknowledge" before proceeding! This insures that users have read the Allowable List of Revisions to approved Labels, and therefore do not apply for unnecessary COLAs.**



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# COLAs Online

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## Create Application

### Step 1 of 3: Application Type

Step 1 | [Step 2](#) | [Step 3](#) |

#### Type of Product ?

- Wine
  - Domestic SAKE Application
- Distilled Spirit
- Malt Beverage

#### Source of Product ?

- Domestic
- Imported

#### Type of Application ?

- Certificate of Label Approval
- Certificate of Exemption from Label Approval
  - \*This item will only be sold in

#### Resubmission ?

Is this application a resubmission of a previously rejected application?

- Yes    No

\*If yes, indicate the previously rejected TTB ID

or

Cancel application

Next >>





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## Create Application Step 2 of 3 : COLA Information

[Step 1](#) | [Step 2](#) | [Step 3](#)

### Application Information:

Serial Number 15-

Plant Registry/Basic Permit/Brewer's No.

--Select Permit #--

No.	Address	Select Principal Place of Business	Remove?
(None assigned)			

DBA/Trade Name (if any)

Brand Name

Fanciful Name (if any)

### FORMULA(s)

TTB Formula ID:   
--Select TTB Formula ID --

OR

Permit Number: Company Formula #/SOP #:   
--Select Permit #--

List of Formulas

(None assigned)

**Sulfite Analysis Submission ID:**

**OR**

(None assigned)

---

**Net Contents**

---

Net Contents	Remove?
(None assigned)	

---

**Alcohol Content**

**Wine Vintage** (if on label)

**Grape Varietal(s) (If any)** (if on label)

**Wine Appellation** (if on label)

**Notes to Specialist**

**Previous Notes**





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### Create Application Step 3 of 3 : Upload Labels

[Step 1](#) | [Step 2](#) | [Step 3](#)

SHOW ANY INFORMATION THAT IS BLOWN, BRANDED, OR EMBOSSED ON THE CONTAINER (e.g., net contents) ONLY IF IT DOES NOT APPEAR ON THE LABELS AFFIXED BELOW. ALSO, SHOW TRANSLATIONS OF FOREIGN LANGUAGE TEXT APPEARING ON LABELS.

#### Upload Label Images:

*Note: These images will appear to the public on the Public COLA Registry if approved. Only add label images that should appear on the approved COLA form in this block. Use the next section to upload other attachments.*

File Name	File Size	Type	Dimensions
<a href="#">&gt;&gt; add/remove Images</a>			

#### Upload Other Attachments:

*Examples: photos of a distinctive liquor bottle, photos of an acetate bottle, scanned copies of approved formulas, lab reports, etc.*

File Name	File Size	Type
<a href="#">&gt;&gt; add/remove Attachments</a>		

[Cancel application](#)

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## Verify Application

[Step 1](#) | [Step 2](#) | [Step 3](#) | Verify Application

A summary of the data you entered is listed below. If you see any errors, please correct them by navigating to the appropriate step.

Submit the application to TTB by agreeing to the statement at the bottom of the page and clicking the Submit button. (You may also choose to save your application for 30 days and submit it to TTB at a later date. If you do not act on the application within 30 days, TTB will delete the incomplete application from the system.)

[edit step 1](#)

Type of Product: [REDACTED]

Source of Product: [REDACTED]

Type of Application: [REDACTED]

[edit step 2](#)

Serial #: [REDACTED]

**Contact Information**

[REDACTED]

Phone Number: [REDACTED]

Fax Number: [REDACTED]

**Plant Registry/Basic Permit/Brewers No (Principal Place of Business):**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] COLOMBIA, SC 29204

**DBA/Trade Name:**

[REDACTED]

**Plant Registry/Basic Permit/Brewers No (Other):** [REDACTED]

**Brand Name:** [REDACTED]

**Fanciful Name:** [REDACTED]

**Net Contents:** [REDACTED]

**Alcohol Content:** [REDACTED]

**Wine Appellation:** [REDACTED]

**Wine Vintage:** [REDACTED]

**Grape Varietal(s):** [REDACTED]

TTB Formula ID:

Sulfite Analysis Submission ID:

Lab No. & Date/Pre-Import No. & Date: N/A

edit step 3

Special Wording:

[REDACTED]

Labels: [REDACTED]

File Name [REDACTED] File Size [REDACTED] Type [REDACTED] Dimensions [REDACTED]

Other Attachments: [REDACTED]

File Name [REDACTED] File Size [REDACTED] Type [REDACTED]

Under the penalties of perjury, I declare: that all the statements appearing on this application are true and correct to the best of my knowledge and belief; and, that the representations on the labels attached to this form, including supplemental documents, truly and correctly represent the content of the containers to which these labels will be applied. I also certify that I have read, understood and complied with the conditions and instructions which are attached to an original TTB F 5100.31. Certificate/Exemption of Label/Bottle Approval.

I agree

Date of Application 07/21/2015 Applicant Name Gabriel Cetean

Submit application

or

Don't submit yet; save for 30 days

Cancel application

<< Previous



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## COLAs Online

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### COLAs Online / Public Cola Registry

1. [Online Industry Member Manual](#)
2. [Download Online Industry Member Manual](#)
3. [COLAs Online User Registration](#)
4. [Web Site Privacy and Security Act Notice](#)
5. [Definition of Terms](#)
6. [COLAs Online FAQs](#)

### TTB Form 5100.31

1. [Application for and Certification/Exemption of Label/Bottle Approval](#)
2. [TTB Form 5100.31](#)
3. [Allowable Revisions to Approved Labels](#)
4. [Paperwork Reduction Act Notice](#)
5. [COLA Form Privacy Act Statement](#)

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## COLAs Online

ALCOHOL AND TOBACCO TAX AND TRADE BUREAU

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### Paperwork Reduction Act Notice

This request complies with the Paperwork Reduction Act of 1995. We collect this information to verify your compliance with the Federal laws and regulations we administer for the labeling of alcohol beverages. This information is mandated by statute (27 U.S.C. 205) and is used to obtain a benefit.

We estimate 30 minutes as the average burden for you to complete this form depending on your individual circumstances. You may comment to us about the accuracy of this burden estimate or suggest ways for us to reduce the burden. Address your comments or suggestions to: Reports Management Officer, Regulations and Procedures Division, Alcohol and Tobacco Tax and Trade Bureau, Washington, DC 20005.

We may not conduct this collection of information, and you are not required to respond to this request, unless it displays a current OMB control number.

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**This Paperwork Reduction Act Notice will be revised to note that the burden estimate for this form is 31 minutes (not the stated 30 minutes). The address for TTB will also be updated to read "1310 G Street, NW., Box 12, Washington, DC 20005."**





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**The COLA Form Privacy Act Statement shown above will be replaced with the “Disclosure Statement from the paper form, TTB F 5100.31, which reads as follows:**

### DISCLOSURE STATEMENT

We require this information under the authority of 27 U.S.C. 205(e). You must disclose this information so we may verify your compliance with the Federal laws and regulations we administer for the labeling of alcohol beverages.

We use this information for the purposes described in the preceding paragraph. In addition, the information may be disclosed to other Tax Federal, State, and local law enforcement and regulatory agency personnel to verify information on the application and to aid in the performance of their duties. The information may further be disclosed to the Justice Department if it appears that the furnishing of false information may contribute to a violation of Federal law. If you fail to supply complete information, then there will be a delay in the processing of your application.

After TTB issues a certificate of label approval, a certificate of exemption from label approval, or a distinctive liquor bottle approval, copies of the approved applications are made available for public inspection.