



CCOF

Certification Services, LLC



June 28, 2005

To: CCOF Certified Vineyards and Vintners

Subject: ORGANIC WINE LABEL UPDATE

The Alcohol Tobacco Tax and Trade Bureau (TTB) and USDA National Organic Program (NOP) announced three new policies regarding organic wine label approvals, effective May 23, 2005. The announcements can be found at http://www.ttb.gov/afd/afd_organic.html. All of us at CCOF recognize that the new policies are a hardship on organic grape growers and vintners. CCOF is providing this summary of the wine labeling categories that are affected as a service to you:

CATEGORIES DEFINED/REGULATED BY USDA NOP REGULATION.

1. **Organic wines** Made at a certified winery under National Organic Program regulations, no sulfites added.
2. **Wines Made with Organic Grapes** Made at a certified winery, under National Organic Program regulations, may have added sulfites.
3. **Wine with an organic ingredient statement only** Contains at least some certified organic grapes but not required to be made at a certified winery or be certified. CCOF has no oversight over these products but appreciates your support of organic farmers.

NEW POLICIES DEFINED BY TTB and NOP.

"Organic" and "Made With Organic Grapes":

Certified wine makers must submit labels to CCOF for approval before submitting labels to the TTB. When you submit a COLA application to the TTB, you must include:

- a) Label approval from CCOF,
- b) Organic certificate and,
- c) Client Profile showing the wine as an approved product.

For wines labeled "Made With Organic Grapes" (MWOG) on the principal display panel: The USDA in cooperation with the TTB have further limited the wording used to describe wines made with certified organic grapes. **The TTB will no longer approve labels with terms "Organically Grown."** The only allowed variations of the MWOG wording is the following list provided by the NOP and TTB:

- "Made with Organic Grapes,"
- "Made with Organically Grown Grapes,"
- "Made with Organic Grapes from our Vineyard," or
- "Made with Organically Produced Grapes."

For wines that make an Organic Ingredient statement only: TTB requires that you submit the certificates for the grapes used with the COLA application. These products are not required to be reviewed by CCOF.

We recognize that the COLA application process for organic producers is becoming increasingly complex. We want to help you get your label approved and are ready to answer questions and work with you. Thank you for producing a great organic product.



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WINE LABELS GUIDANCE & LABEL APPROVAL STEPS

1. Use this guidance checklist to help you design your labels. (Please do **not** send it to CCOF.)
2. Send your draft label(s) to CCOF before finalizing for pre-review.
3. After you receive CCOF's approval, submit the original, unmarked COLA to the TTB as usual.

All responses for the label category must be "True".

For wines made prior to the NOP regulation (2002 or before) use this section only:

MADE IN 2002 OR BEFORE (NOP* § 205.100)

	True	False
1. If CCOF's name or seal is used, your company was certified for the product when it was processed.		
2. No reference to USDA (name or seal) or National Organic Program or its regulations.		

For wines made in 2003 or after, determine the appropriate label category & complete the appropriate section.

ORGANIC INGREDIENT STATEMENT ONLY (NOP* §§ 205.305; 205.101; 205.310; 205.201)

CCOF does not regulate and is not required to approve these labels.

- Certification of the processor is not required.
- May state percent organic ingredients on the information panel if an organic ingredient statement is used.

	True	False
1. All organic ingredients are from certified organic operations.		
2. Ingredient statement appears on information panel or on information portion of a single-panel label.		
3. Ingredient statement is in the form: "Ingredients: Organic ---, (with other ingredients listed as appropriate)." <i>May use asterisk or other mark defined below the ingredient statement to indicate the ingredient is organic.</i>		
4. Does not use "100 percent organic" to describe ingredients.		
5. Does not use "organic" anywhere on the label except in the ingredient statement.		
6. No reference to USDA (name or seal) or National Organic Program or its regulations.		
7. No reference to certification or any certification agent (name or seal).		

MADE WITH ORGANIC GRAPES (NOP §§ 205.304; 205.301(c); 205.201)

- Certification of both the grower(s) and processor(s) is required.
- May make the "Made with Organic ..." claim on any panel of the label.
- May state the percent organic ingredients on any panel, if the type does not exceed half the size of the largest type on the panel and is entirely same type size, style, & color without highlighting.
- May use CCOF's name and seal.
- May use sulfur dioxide ("Sulfites Added" statement should appear on the label.)

	True	False
1. Certified Organic by CCOF" or similar statement is located on information panel directly beneath or adjacent to the information identifying the certified producer.		
2. CCOF certifies the processor described as "certified" or the label otherwise names the CCOF certified processor or grower, or a CCOF Private Label Affidavit is submitted. <i>If you have questions about who is listed as the certified party, resolve them before final approval.</i>		
3. No reference to USDA (name or seal) or National Organic Program.		
4. May use one of these phrases: "Made with Organic Grapes," "Made with Organically Grown Grapes," "Made with Organic Grapes from Our Vineyard," or "Made with Organically Produced Grapes." No others accepted.		



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5. "Made with Organic..." statement is in letters that are no bigger than half the size of the largest type on the panel.		
6. Words in "Made with Organic..." statement are all the same type size, style, and color without highlighting.		
7. Organic System Plan on-file for the wine**		

ORGANIC (NOP* §§ 205.303; 205.300; 205.301; 205.201)

- Certification of both the grower(s) and processor(s) is required.
- May make the "Organic" claim on any panel of the label; no restrictions as to size, color, or highlighting.
- May state the percent organic ingredients on any panel, if the type does not exceed half the size of the largest type on the panel and is entirely same type size, style and color without highlighting.
- May use the USDA name and seal and reference the National Organic Program
- May use CCOF's name and seal.
- Ingredient statement is not required.

	True	False
1. "Certified Organic by CCOF" or similar statement is located on information panel beneath the information identifying the certified winery or producer.		
2. CCOF certifies the processor described as "certified" or the label otherwise names the CCOF certified processor or grower, or a CCOF Private Label Affidavit is submitted.		
3. The CCOF seal, if used, is not more prominent than the USDA seal.		
4. Sulfur dioxide is not added during the production of the wine (there is no "Sulfites Added" statement on the label).		
5. Organic System Plan H2.1 form on-file with CCOF for the wine**		

100 PERCENT ORGANIC (NOP* §§ 205.301; 205.303; 205.201)

- All statements for "Organic" label above apply.

	True	False
1. No nonorganic ingredients or processing aids except salt and water. This restriction includes yeast.		
2. "Certified Organic by CCOF" or similar statement is located on information panel beneath the information identifying the certified winery or producer.		
3. CCOF certifies the processor described as "certified" or the label otherwise names the CCOF certified processor or grower, or a CCOF Private Label Affidavit is submitted.		
4. The CCOF seal, if used, is not more prominent than the USDA seal.		
5. Sulfur dioxide is not added during the production of the wine (there is no "Sulfites Added" statement on the label).		
6. Organic System Plan H2.1 form is on file with CCOF for the wine**		

Further guidance for organic alcoholic beverage labeling is available at: www.ttb.gov/alfd/alfd_organic.html

*'NOP' refers to the National Organic Program regulation, 7CFR Part 205, found at www.ams.usda.gov/nop.

** CCOF wine makers who are estate-only may work from a generic Organic System Plan. All others must have annually updated Product Profiles showing sources of grapes for each wine.