



NUTRITION LABELING FAQs

GENERAL NUTRITION LABELING AND ADVERTISING INFORMATION

Is my wine subject to tax and trade bureau (TTB) or food and drug administration (FDA) regulations?

The Federal Alcohol Administration Act (FAA Act) regulates wine, spirits and malt beverages and grants general authority to oversee these products to the TTB.

However, the following alcohol beverage products do not fall within the FAA Act definitions:

- Wines that contain less than 7% alcohol by volume including (but not limited to) grape wine, sparkling or carbonated wine, fruit wine, sake, wine coolers, cider and dealcoholized or partially dealcoholized wine.
- Beers that are not made from both malted barley and hops (but are instead made from a malted barley substitute such as corn, rice or wheat) or are made without hops.

Products that do not fall within FAA Act definitions are subject to the food labeling regulations issued by the FDA. Labels for such alcohol beverage products must comply with applicable [FDA food labeling requirements](#), including ingredient labeling, nutrition labeling and allergen labeling requirements.

For more information, please visit:

<https://www.ttb.gov/wine/7percentormore>
<https://www.ttb.gov/wine/7percentorless>

What does the TTB Ruling on Expanded Tolerances for Voluntary Calorie Statements in the Labeling and Advertising of Wine, Distilled Spirits, and Malt Beverages mean for wine labeling and advertising?

The new ruling clarifies that industry members may rely on the use of databases and “typical values” for voluntarily reporting calories. This enables industry members to provide nutrition information to consumers in a cost-effective way by using industry tools such as the Wine Institute Nutrition Data Calculator for Voluntary Labeling and Advertising.

The ruling expands the tolerances for calorie statements in alcohol labeling and advertising, allowing an understatement of calories by as much as 20%. Overstatements of calories will be considered compliant if they are within a reasonable range and within good manufacturing practices.

The ruling does not change the tolerances for fat, carbs or protein. Overstatements of protein, and understatements of carbs and fat are still compliant if within the 20% tolerance.

What is the Wine Institute Nutrition Data Calculator for Voluntary Labeling and Advertising?

This calculator generates TTB-compliant nutrition information for labeling and advertising of wine greater than 7% alcohol by volume. The Calculator uses “Typical Values charts” for calculation of calories and carbohydrates in wine. The calculator incorporates the TTB tolerances for calories and carbohydrates noted above. For more information, please visit Wine Institute’s [Nutrition Data Calculator for Voluntary Labeling and Advertising](#).

Wine Institute also offers a Nutrition Data Calculator for Menu Labeling which generates FDA-compliant nutrition information for FDA’s menu labeling rule. For more information, please visit Wine Institute’s [Nutrition Data Calculator for Restaurant Menus](#).

Can I advertise the calorie or carbohydrate content of my product in labeling and advertising?

Yes, these statements are permitted as long as they are truthful, accurate and not misleading. You **must** also include a statement of average analysis or Serving Fact Panel in the advertisement or label.

What is a Statement of Average Analysis?

Statements of average analysis must list the number of calories, as well as the number of grams of carbohydrates, protein and fat, per serving size. No additional information in the statement of average analysis is authorized. (2004-1).

What is a Serving Facts Statement?

A **Serving Facts statement** includes the serving size, the number of servings per container, and the number of calories and the number of grams of carbohydrates, protein, and fat per serving size.

Alcohol beverages may also include the percentage of alcohol by volume in the statement, and if so, may also include the number of fluid ounces of pure ethyl alcohol per serving as part of the alcohol by volume statement. (2013-2).

Can I base advertising claims on a size other than 5 fl. oz.?

In general, nutrition information must be provided consistent with amount per standard serving size of the product (5 fl. oz. for wine 7 to 16% alcohol percent by volume). The only exception applies where the container is less than a standard serving size of the particular product; in those cases, the statement of average analysis should refer to the container size. For more information on serving sizes for wine, see page 7 of [TTB Ruling 2013-2](#).

REQUIREMENTS FOR CALORIE, CARBOHYDRATE AND SUGAR CLAIMS IN LABELING AND ADVERTISING

Low Calorie

- Must be truthful, accurate and not misleading.
- Must also include a statement of average analysis or Serving Facts statement.
- Note, “low calorie” as a term is not defined by TTB, the term “low” is subjective. What is considered misleading is also subjective.
- For further information about whether your product would be considered “low calorie” please contact the TTB Market Compliance Office at 202-453-2251 (option 4) or by email at Market.Compliance@ttb.gov.

Less Than 100 Calories Per Serving

- Must be truthful, accurate and not misleading.
- Must also include a statement of average analysis or Serving Facts statement.
- Must be based on the standard serving size for the product (5 fl. oz. for wine 7 to 16% alcohol percent by volume).

Numerical Reference to Carbohydrate Content

- Must be truthful, accurate and not misleading.
- Must also include a statement of average analysis or Serving Facts statement.
- The number of grams of total carbohydrates in a serving must be expressed to the nearest tenth of a gram.
- Must be based on the standard serving size for the product (5 fl. oz. for wine 7 to 16% alcohol percent by volume).

Less Than 1 Gram of Carbohydrates

- If a serving contains less than 1 gram, the statement “Contains less than 1 gram” or “less than 1 gram” may be used as an alternative to expressing the number of grams of carbohydrates in a serving to the nearest tenth.
- Must be truthful, accurate and not misleading.
- Must also include a statement of average analysis or Serving Facts statement.
- Must be based on the standard serving size for the product (5 fl. oz. for wine 7 to 16% alcohol percent by volume).

Zero Grams of Carbohydrates

- If the serving contains less than 0.5 gram, the content may be expressed as zero.
- Must be truthful, accurate and not misleading.
- Must also include a statement of average analysis or Serving Facts statement.
- Must be based on the standard serving size for the product (5 fl. oz. for wine 7 to 16% alcohol percent by volume).

Low Carb

- Single serving of product contains no more than 7 grams of carbohydrates.
- Must be truthful, accurate and not misleading.
- Must also include a statement of average analysis or Serving Facts statement.
- Must be based on the standard serving size for the product (5 fl. oz. for wine 7 to 16% alcohol percent by volume).

Reduced/Lower/Fewer Carbs

- The term must be used as part of a statement that specifies the number of carbohydrates per serving size and compares that number with the number of carbohydrates in another specified product by the same producer.
- Must be truthful, accurate and not misleading.
- Must also include a statement of average analysis or Serving Facts statement.

Numerical Reference to Sugar Content

- Must be truthful, accurate, and not misleading.
- Must also include a statement of average analysis or Serving Facts statement.
- The number of grams of sugar in a serving must be expressed to the nearest tenth of a gram.
- Must be based on the standard serving size for the product (5 fl. oz. for wine 7 to 16% alcohol percent by volume).

REQUIREMENTS FOR CALORIE, CARBOHYDRATE AND SUGAR CLAIMS IN LABELING AND ADVERTISING

Less Than One Gram of Sugar

- If a serving contains less than 1 gram, the statement “Contains less than 1 gram (g)” or “less than 1 gram (g)” may be used as an alternative to expressing the number of grams of sugar in a serving to the nearest tenth.
- Must be truthful, accurate and not misleading.
- Must also include a statement of average analysis or Serving Facts statement.
- Must be based on the standard serving size for the product (5 fl. oz. for wine 7 to 16% alcohol percent by volume).

Zero Grams of Sugar

- If the serving contains less than 0.5 g of sugar, a claim such as “Zero Sugar,” “No Sugar” or “Sugar Free” may be included.
- Must be truthful, accurate and not misleading.
- Must also include a statement of average analysis or Serving Facts statement.
- Must be based on the standard serving size for the product (5 fl. oz. for wine 7 to 16% alcohol percent by volume).

Abbreviated References to Calorie or Carbohydrate Content (ex. “3.6g Carbs” or “95 Calories”)

- Must be truthful, accurate and not misleading.
- Must also include a statement of average analysis or Serving Facts statement.
- Abbreviated reference must be consistent with the statement of average analysis or Serving Facts statement that appears elsewhere on the label or advertisement.
- Must be based on the standard serving size for the product (5 fl. oz. for wine 7 to 16% alcohol percent by volume).

USEFUL RESOURCES

<https://www.ttb.gov/labeling-wine/alcohol-beverage-labeling>

<https://www.ttb.gov/wine/labeling>

<https://www.ttb.gov/wine/7percentorless>

<https://www.ttb.gov/wine/7percentormore>

For additional information about statements of average analysis, Serving Facts statements, and calorie and carbohydrate content representations on labels or in advertisements for alcohol beverages, see:

[TTB Ruling 2004-1](#)

[Frequently Asked Questions about TTB Ruling 2004-1](#)

[TTB Ruling 2013-2](#)