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TTB Revises Beer Guidance for Formulas, Labels and In-Bond Transfers

The updated FAQ tells brewers when federal formula or label approval is required and how in-bond moves must be documented.

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The Alcohol and Tobacco Tax and Trade Bureau on Tuesday revised its online beer frequently asked questions page, giving brewers and other alcohol businesses updated guidance on when beer formulas are required, when labels need federal approval, and

how beer may be transferred in bond between licensed premises.

The agency’s Beer FAQs page addresses core compliance issues for companies that make, package, move, label, and sell beer regulated by the federal government. The guidance says a beer formula is a document submitted to TTB that lists the ingredients and brewing process used to make a beer. According to the bureau, a formula is required for most beers that will be commercially bottled or canned.

TTB also says formula approval is needed for beers that contain additives or flavorings that are not standard beer ingredients, as well as for new styles or other non-traditional beer products. For breweries that regularly release seasonal, flavored, or specialty products, that point can affect how early they need to prepare regulatory filings before production and packaging begin.

The updated page also explains how brewers must submit applications. TTB says formula submissions and Certificate of Label Approval applications are filed electronically through its COLAs Online system. A COLA, the bureau says, is the authorization that allows an alcoholic beverage to be sold in interstate commerce with a specific label.

That distinction matters because formula approval and label approval are separate steps, even when both may apply to the same product. A brewery may need a formula because of ingredients or processing, and it may also need a COLA before selling the product across state lines with a particular label. The FAQ page is aimed at clarifying when those requirements apply and how businesses should handle them.

The bureau also used the updated page to address transfers of beer in bond, an issue that can affect both brewery operations and distribution planning. TTB says beer may be transferred in bond between breweries or other licensed premises under certain regulations. The agency adds that those transfers must be documented accurately and that records must be kept and reports submitted as required.

For companies that move beer between production sites, storage locations, or related licensed facilities, that guidance is important because in-bond transfers can carry tax and recordkeeping implications. A clearer statement from TTB may help breweries and

distributors reduce the risk of compliance problems tied to inventory movement, reporting errors, or incomplete paperwork.

The FAQ page also touches on exports. TTB says labels for beer exported from the United States must comply with federal export rules and may be subject to different requirements from labels used for domestic sales. That can be relevant for breweries that make products for foreign markets and need to manage separate label versions or approval paths.

In addition, the bureau says licensed brewers must file required reports covering production, operations, and removals, using prescribed forms and deadlines. Those reporting duties are a routine part of federal beer regulation, but the FAQ format places them alongside formula, labeling, and transfer questions that breweries often face at the same time when launching or shipping products.

The TTB page is not a new rulemaking document, but it serves as a practical compliance reference for the industry. For beverage companies, especially brewers and distributors handling specialty beers or multi-site operations, the revised guidance may shape how they review formulas, prepare labels, document transfers, and schedule federal filings before products reach the market.

The bureau said additional detailed answers on beer regulation, production, labeling, and compliance remain available through the Beer FAQs section of its website.