



California Craft Brewers Association

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CCBA Growler Clarification

Labeling of Containers (Including Growlers)

The Alcoholic Beverage Control Act allows a beer manufacturer (holder of an ABC type 01 or type 23 license) to fill for sale any sealable container as long as specific guidelines are met. There is no mention of “growler” in the ABC Act. Growlers fall under the same category and regulations as any sealable container such as bottles or kegs. As such, they must have affixed a label that has been approved by the ABC and which meet the following requirements:

- The information on the container must be submitted to and approved by the California Department of ABC. See details on label approval below.
- The container must be sealable (to distinguish it from a glass of beer or other open container). Screw top, cork, flip top, etc.
- Any and all information pertaining to another beer manufacturer other than the one filling/selling the container must be obscured.
- As a refillable container, California Redemption Value (CRV) is not required.

State Label Approval Process

- California labeling requirements are detailed in Sections 25200-25206 of the ABC Act and Rule 130 of the California Code of Regulations. These can be found [online](#) at the ABC website. Scroll to page 311 for sections 25200-25205 and page 469 for Rule 130.
- For label approval you must file [ABC form 412](#) (Application for Label Approval). This form has specific instructions on how to file.
- Growler labeling requirements are the same as for any container sold for off-site sales including bottles and kegs. Information required by the ABC on the label are as follows:
 - Name and location of the manufacturer (city and state) and bottler (if different).
 - Name of the beer in the container.
 - Alcohol content is mandatory if 5.7% abv or greater. It is optional if below.
 - Net contents of the container.
- What is allowed:
 - You must have label approval for each style and each size container that you sell.
 - You do not have to file a separate form for each style or each new beer – multiple brands and sizes can be listed on the same form. When you file form 412, it is suggested that you list any and all brands you think you might be selling in the future.

- When you submit form 412 for approval, you must include an example of each label for each product and each size listed on the form.
- You do not need a unique printed label for each brand. You can write the beer name on the container or use “check mark boxes,” but each brand that you write in or have a check box for must have approval by the ABC. See photo example of neck hanger.
- An original label of each brand and size listed on form 412 must be included with the form. Photocopies are not acceptable. If it is an affixed tag or neck hanger, these must be submitted with the form.
- If your label is embossed on the container or you handwrite the information on the container, you must provide a photograph of the container and label.
- You need label approval for each container size but do not have to file a separate form for each size of container. List all of the container sizes you will be filling on form 412. Filling a container size that is not approved by the ABC is a violation.
- “Check mark” boxes are allowed. You can submit one label for approval stating the brewery name and location with a check mark box for each of your brands. You may also have a blank space to write in the brand. Handwritten labels are allowed. See neck hanger example.
- Required information on a label is allowed to be handwritten (permanent sharpie recommended).
- Written information on a container cap is allowed. Typically there is only room on a growler cap for the beer name and/or alcohol content. A cap with the handwritten example must be included with your form 412.

Note: A type 75 license is a retail license and is not allowed, per section 23401 of the Alcoholic Beverage Control Act, to “label, bottle, package, or refill any package with any alcoholic beverage.” A type 75 cannot sell beer (bottles, growlers, kegs) for off-site sales. Per 23396.3, a type 75 is allowed to sell packaged beer, including growlers, to a licensed beer wholesaler (holder of a type 17) for wholesale distribution.

Federal Requirements

- The TTB considers a growler that is filled at the request of the customer to be a serving vessel or glass and is not considered a package. If the growler is pre-filled, prior to the customer ordering it then it is considered a package and must include the Government warning. [Details here](#). We recommend that all growlers include the Government Warning.

Best Practices

The following are CCBA recommended Best Practices when refilling a growler supplied by the consumer and previously filled by another brewery:

- Any and all information, logos or references to any brewery that previously filled the container should be obscured in a manner that is not readily removable. Placing a paper bag over the container or wrapping it with paper would not meet these criteria.

- To obscure label information from a previous brewery, the CCBA recommends a 3" opaque black stretch wrap. This is easy to apply and has a fairly good appearance. It is a much a better alternative to duct tape. One source of this tape is McMaster Carr (catalog pages 1559 and 1560 or [online](#)). We recommend that you purchase the handheld wrap dispenser (Item C). Part # for 3" tape wrap is 2092T616. Part # for dispenser is 2092T21.
- Although not required, the label should include the filling date for quality purposes.
- Brewers should refuse to fill plastic or paper containers of any kind. These materials cannot be cleaned properly and are likely to harbor bacteria.
- "Handling instructions" should be included on your container (see attached neck hanger example).
- You should not obliterate or permanently remove a previous breweries logo or brand name or otherwise deface a growler from another brewery.
- Do not refill a container size that you do not have label approval for. This is a violation.
- The CCBA recommends using a neck hanger as an affixed label. It allows for best appearance, it is versatile for checking off or writing in the brand name, container size and alcohol content and holds up well in moist conditions.
- Every brewery should have a policy for refilling growlers. This should be made easily available to the consumer. It is ultimately in the best interest of the consumer to only refill growlers under specific pre-determined conditions.
- There are many inexpensive growler options out there. The CCBA recommends you only use growlers which will maintain the integrity of your beer. Colored glass or double-walled/insulated stainless growlers are highly recommended. When purchasing growlers, consider the ability of the seal to maintain carbonation, glass thickness and universal content sizes.
- The health and safety of customers as well as employees should be held in high regard at all times.
- It is recommended that all growlers include the TTB Government Warning.

CONSUMER NOTE: CCBA member breweries take great pride in the products they produce. It is of the utmost importance that the quality and integrity of the beer they produce is maintained from the time it leaves the brewery until it is consumed. The cleanliness, functionality and integrity of the refillable container is critical. Therefore, breweries may choose not to refill certain containers for a wide variety of important reasons. Cleanliness of the container when it is brought in for refill, or the ability of the brewery to clean a container before refilling, is vital. Some breweries are using inexpensive containers that do not seal properly or have questionable glass thickness and these should not be reused. In some cases, brewers may not be able to comply with label requirements of refilling certain sized containers. Please keep in mind that the design of some breweries draft systems or growler filling stations may only be able to accommodate a certain size and type of growler. Refilling of growlers is a great way for consumers to sample beers from different breweries in an affordable way and offers an environmentally favorable method of doing so. For Craft Brewers, maintaining the quality of the beer up to point-of-consumption is, above all else, the most important factor when filling any kind of packaging including growlers.