

FROM :

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Weimax Wines & Spirits

Comment 48



www.weimax.com

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REGARDING NOTICE #49-- TTB Proposed Changes to Vintage Dating Regulations

DEAR BATF,

As a wine merchant and retail shop owner, I wish to suggest that the BATF not change the requirements for vintage-dated wines from the present 95% minimum.

The labeling laws should allow consumers to make informed decisions about which wines to purchase. Weakening these laws to conform to those of wine-producing countries with low standards is not the proper answer to this question.

If American wineries wish to blend various vintages, they can always assign a "lot number" or "batch" number to their products. They are also allowed to offer wines without a vintage date. We would only be in favor of allowing labels to show multiple vintage dates were the percentages of each year displayed clearly on the wine label.

However, over the years the consumer understands the notion of a "vintage dated" wine as being a higher quality wine than those which do not carry a vintage year on the label. That bit of vintage information is vital to many consumers. Many "bulk" wine producers also offer higher-priced bottlings which carry vintage dates. That bit of distinguishing information might be more costly to produce and consumers are routinely asked to pay a higher price for such wines.

Many consumers, for example, did not have much interest in Cabernets from the difficult vintages of 1998 and 2000. While it is honorable to want to believe that some vintners might actually "improve" their wines by blending better wines from neighboring vintages, we have difficulty in believing this would actually be the case. We expect most producers would have simply gotten rid of lackluster wines by "losing" them in so-called better vintages. This does little to improve wine quality and it certainly is not in the best interest of the consumer.

The notion of allowing a more lenient percentage of accurate vintage dating in wines with a more broad appellation (that is, requiring a Cameros-labeled wine to be 95% of the stated vintage on the label, while allowing a more 'simple' Napa appellation wine to be but 85% from the stated vintage) places a major burden on consumers to be experts in Federal wine labeling law. The consumer has enough difficulty making an informed decision as to purchasing a good bottle of wine; please don't make this task impossible.

Wine producers should be encouraged to produce ever better quality wines. Label laws should be for the protection of consumers. Weakening the laws to allow producers to legally mislead consumers is hardly the direction to proceed with respect to winery regulations.

Thanks for considering our suggestions.

Sincerely,
Gerald Weisl

wine merchant & wine consumer advocate