



INDUSTRY CIRCULAR

DEPARTMENT OF
THE TREASURY

Bureau of Alcohol, Tobacco and Firearms

Washington, D.C. 20226

Number: 79-6

Date: July 2, 1979

Revision of ATF Form 1649 - Application for
and Certification of Label Approval Under
the Federal Alcohol Administration Act.

Proprietors of Distilled Spirits Plants,
Bonded Wineries, Taxpaid Wine Bottling
Houses, Breweries, Importers, and
Others Concerned:

Purpose. This circular announces an extensive
revision of Form 1649, Application for and
Certification of Label Approval under the Federal
Alcohol Administration Act.

Background. The Distilled Spirits Council of the
United States (DISCUS) submitted a petition to ATF
to revise Form 1649 to reduce the number of appli-
cations filed with ATF by allowing a single label
approval for multiple plants and by increasing the
number of changes which can be made to a label
without refileing for approval. Many aspects of
the DISCUS petition have been adopted in addition
to further changes to help streamline processing
and simplify retrieval of approved certificates
from ATF records. The nature of each revision is
discussed below.

Multiple Filing. The instructions have been
revised to permit filing a single application for
multiple locations where identical labels are
used. One additional copy of the application must
be submitted for each additional location.

Vendor Code. A vendor code is assigned to each
applicant. These codes aid us in identifying the
applicant and retrieving documents from our record-
keeping system. Most industry members know their
own vendor code, so we have revised the form to
require applicants to show their own vendor code

on the form. This will expedite processing applications. New applicants will be assigned a vendor code on their first application, for use on all subsequent applications.

Formula Number. Applicants will be required to show the formula number for products having formulas. This will help us expedite processing, by eliminating the need to qualify certificates.

Format Changes. Part I of the form has been modified to accommodate the three changes discussed above.

Instructions. In addition to the changes discussed above, an instruction is added to clarify the term Brand Name. We have had some difficulty retrieving documents from our recordkeeping system when one brand name is used for more than one product. Therefore, we are asking applicants to provide further identification in the brand name box, for brand names used for more than one product.

Conditions for Approving Labels. We have revised the conditions under which a label may be changed without requiring a new application, as follows:

1. The shape of a label may be changed.
2. The name and/or address of the responsible importer may be changed.
3. The name and/or address of the foreign producer, bottler or shipper may be changed if the producer, bottler, or shipper is located in the same country originally shown.
4. The condition which previously read "In period of age stated or in statement of age and percentage of distilled spirits" has been converted to two separate conditions for clarity.

5. For wines, the stated amount of harvest or residual sugar, acid or pH level may be changed.

Effective Date. After October 1, 1979, applications will not be accepted on old editions of ATF Form 1649.

Availability of Forms. Please destroy all stocks of old editions of ATF Form 1649 and obtain a supply of the new edition from ATF Distribution Center, 3800 South Four Mile Run Drive, Arlington, VA 22206.

Questions. Any questions about this Industry Circular should refer to its number and be addressed to the Assistant Director (Regulatory Enforcement), Bureau of Alcohol, Tobacco and Firearms, 1200 Pennsylvania Avenue, NW., Washington, DC 20226.


Director