



## California Craft Brewers Association

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### CCBA Growler Clarification

[Click here for details on AB 647](#)

#### 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. (NOTE: 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). Like any container, growlers must have an affixed label and brand registration must have been submitted to the ABC. There are several other requirements that breweries must follow to legally fill growlers:

- The label branding on the container must be registered with the California Department of ABC
- The container must be sealable (to distinguish it from a glass of beer or other open container), which includes Screw top, cork, flip top, etc.
- Any and all information pertaining to another beer manufacturer other than the licensee filling/selling the container must be obscured. All text and logos from a previous brewery must be obscured.
- As a refillable container, California Redemption Value (CRV) is not required on growlers.

#### State Brand Registration Process

- For Brand Registration you must file [ABC form 412](#). 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. Brand information required by the ABC for the registration is as follows:
  - The brand, and class or type, of beer
  - The true and correct name and address of the manufacturer of the beer. For purposes of this provision, if multiple beer manufacturers are involved in the production of the beer pursuant to a joint venture or other collaborative agreement, each of those manufacturers may be identified on the label.

- The true and correct name of the bottler of the beer, if other than the manufacturer.
- A statement of alcoholic content if the beer contains more than 5.7 percent ABV

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.

## Retail Sales of Growlers

Growlers are no different than any container of beer such as bottles. Retailers are allowed to sell growlers just like bottles. Retailers are not allowed to *fill* growlers. They must be filled at a licensed beer manufacturer, meet all labeling requirements and be price posted. A retailer may only purchase a growler from a type 23 or 01 self-distributing their own products or from a type 17 beer and wine wholesaler. *A retail license holder is not allowed to fill growlers for resale.*

## Best Practices

The California Craft Brewers Association recommended the following Best Practices for refilling a growler supplied by a consumer and previously filled by another brewery:

- 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. Breweries are never obligated to refill a used growler.
- The health and safety of customers as well as employees should be held in high regard at all times.
- Never refill a used growler if there is any doubt about the sanitation and cleanliness of the container!
- All information, logos or references to any brewery that previously filled the container should be obscured completely.
- Plastic or paper containers of any kind should not be filled. These materials cannot be cleaned properly and are likely to harbor bacteria.

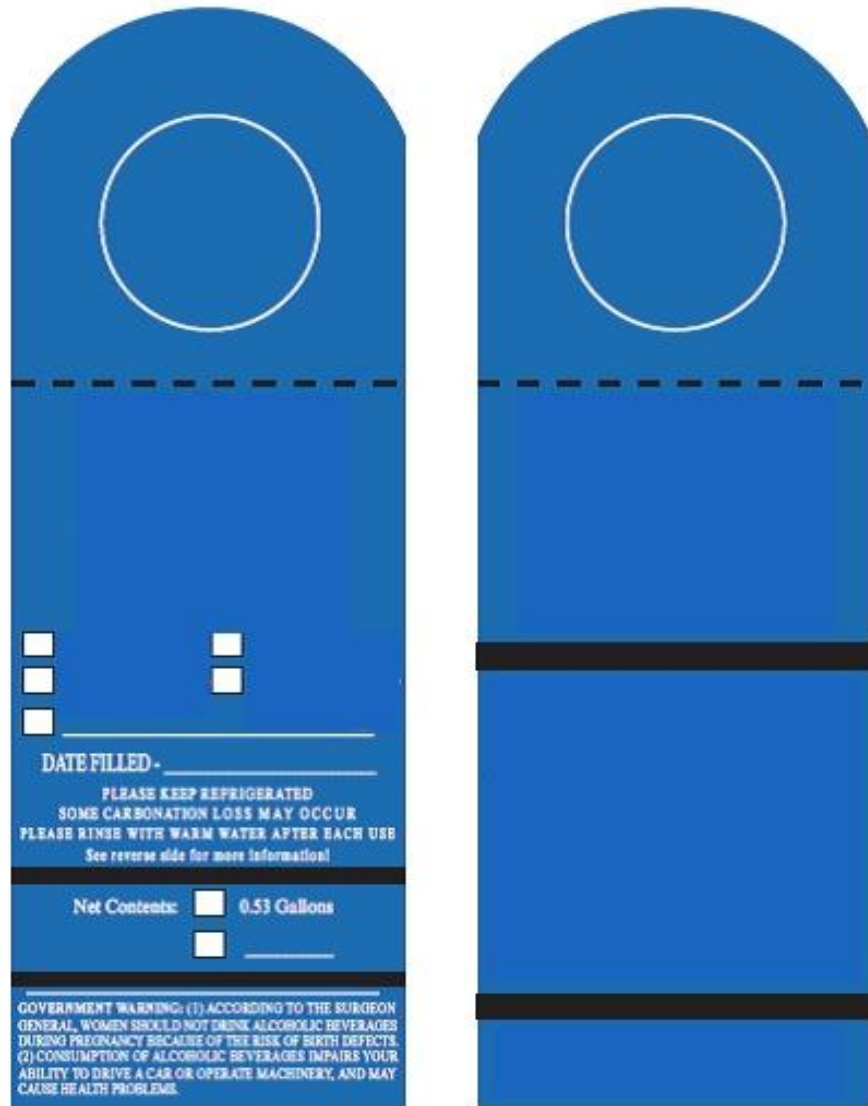
- Use a neck hanger as an affixed label.
- Only use growlers that will maintain the integrity of the beer. Colored glass or double walled/insulated stainless growlers are highly recommended.

### **What Consumers Need to Know**

California Craft Brewers Association 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. Breweries may choose not to refill certain containers for a wide variety of important reasons including the following:

- **Cleanliness** of the container when it is brought in for refill, or the ability of the brewery to clean a container before refilling
- Inexpensive, **low quality containers** that do not seal properly or have questionable glass thickness and should not be reused
- Inability to comply with **label requirements** for refilling certain size containers may prevent breweries from being able to legally fill growlers
- The design of some **draft systems** or growler filling stations only accommodate a certain size and type of growler

Refilling growlers is a great way for consumers to sample beers from different breweries in an affordable & environmentally favorable way. For craft brewers, maintaining the quality of the beer up to point-of-consumption is the most important factor when filling any kind of packaging including growlers.



*This is an example of neck-hangers that can be used on growlers filled at breweries. A neck hanger needs to be provided to the ABC on the label approval application for each brand with a check box. This is just one example of many possible variations.*



*Example of growler with neck hanger and shrink wrap to obscure previous info on container. Shrink wrap dispenser at right.*