

## FAQ – Labeling

### Q: For wine and distilled spirits, what type of containers require CRV labeling?

A: As of 7/1/2025, a CRV message is required for all single use containers holding a wine or distilled spirit beverage. This includes containers made of aluminum, glass, plastic, bi-metal, or containers that are a box, bag, pouch or other similar container regardless of the material.

### Q: What if my product is already bottled? Do library wines and previously bottled vintages require a CRV message?

A: Effective 7/1/2025 all wine and distilled spirit products offered for sale in California will require a CRV message, regardless of when the product was produced. For products bottled without a CRV label, a message will need to be added. Options for adding a CRV message include ink jetting, stamping, or stickers, etc.

### Q: Who is responsible for the CRV message on beverages already on retail shelves?

A: A CRV message is optional on wine or distilled spirit products offered for sale between 1/1/2024 and 6/30/2025. A dealer can continue to sell unlabeled containers through this date. However, effective 7/1/2025 all products covered by the Act will require a CRV message. Beverages without a CRV message can't be sold in California after this date. The dealer will need to work with their supplier to find a temporary labeling solution which may include stickers, ink jetting or stamping, etc. or request the supplier exchange the product for containers labeled with a CRV message.

### Q: How does CRV labeling apply to imported wines?

A: Importers should start working with their out of state/out of country suppliers to inform them of the new California labeling requirements. If their suppliers are unable to revise the labels by 7/1/2025, then the importer will need to add a CRV label to the containers prior to offering those items for sale in California. Unlabeled beverage containers may have CRV message added by attaching a sticker, ink jet, stamp, or painted message. The message must be clear, prominent, and remain on the container from the point of sale to the point of redemption through regular use.

### Q: Are all distilled spirits, wine and wine/distilled cooler beverages included in the program in 2024?

A: Yes, all products containing any amount of wine or distilled spirits will be in the program effective 1/1/2024. This includes carbonated, non-carbonated, sugar free and alcohol-removed wine or distilled spirit products regardless of the percentage of alcohol by volume.

**Q: We don't use paper labels on our wine bottles. Are there other options for permanent CRV labeling other than printing?**

A: Yes, the CRV message can be painted, scratched embossed, raised letter embossed or permanent ink jetted if the message is clear, prominent, and indelibly marked.

**Q: What is temporary labeling?**

A: Temporary labeling is when a California Redemption Value message is added to an unlabeled beverage container by attaching a sticker, ink jet, stamp, or painted message. To be authorized, a temporary CRV message must be clear, prominent, and indelibly marked and remain on the container from the point of sale to the point of redemption through regular use.

**Q: Can I update my labels now (2023) before the 1/1/2024 effective date?**

A: When to add a CRV label will depend on when the product will be offered for sale. Wine or distilled spirit items offered for sale during calendar year 2023 should not be labeled. If you have a high volume or quick sell product which you bottle regularly, you should wait until 2024 before adding the message. However, if you produce a product which requires in-bottle ageing and the product will not be offered for sale until 1/1/2024 or later, we suggest adding the CRV message during the bottling process. This will prevent you from having to revise the label when the product has finished ageing and is ready for market.

**Q: Is laser etching on glass bottles acceptable or are there other options for permanent CRV labeling other than printing on a paper label?**

A: Yes, the CRV message can be painted, scratched embossed, raised letter embossed or permanent ink jetted. Keep in mind the message must be visible, clearly, and prominently displayed, and meet the size/height requirements of CCR 2200. For more information on labeling, please view our informational poster: [Publication Summary](#).

## **FAQ – Responsibilities as a BMDS**

**Q: Do I need to report processing fees or CRV on items shipped out of state?**

A: Report items sold or transferred in California only. Beverages shipped out of California should not have CRV or processing fee reported.

**Q: Do I need to report processing fees on items bottled before 1/1/2024?**

A: Processing fees are reported based on when the item is sold or transferred in California, not when the product was bottled. As a beverage manufacturer, you will report processing fees when you sell or transfer a beverage, on or after 1/1/2024.

Q: Do I need to report CRV on item bottled before 1/1/2024?

A: CRV is reported based on when the item is sold. Wine and distilled spirits sold 1/1/2024 or later will require CRV reporting, regardless of when the product was bottled.

Q: I am a California winery using a contract bottler. I then sell my brand direct to retail and consumers in California. What am I responsible for?

A: A brand owner selling product direct to dealer or consumer is a beverage distributor. You are responsible to report and pay CRV on those direct sales. Since you don't bottle, import, hold a Certificate of Compliance or Direct Shippers Permit, you don't meet the definition of beverage manufacturer ([Registration for Beverage Distributors & Manufacturers - CalRecycle Home Page](#)).

Q: I import wine and distilled spirits into California and only sell to other wholesalers. Am I a beverage manufacturer or distributor?

A: An importer of wine and distilled spirits is a Beverage Manufacturer responsible for processing fees and ensuring the containers imported have a CRV message by 7/1/2025. Since you have no direct sales to dealers or consumers you don't meet the definition of distributor ([Registration for Beverage Distributors & Manufacturers - CalRecycle Home Page](#)).

Q: I manufacture a beverage and self-distribute to dealers. What am I responsible for?

A: In this scenario you would hold responsibility as both a beverage manufacturer and distributor. An entity who bottles, cans or fills a container in California is a beverage manufacturer responsible for processing fees and CRV labeling. A beverage manufacturer who then sells those products direct to dealers or consumers is also the beverage distributor, responsible to report and pay CRV.

Q: I meet the definition of both beverage manufacturer and distributor. I am required to fill out 1 or 2 monthly reports?

A: A entity identified as holding both Beverage Manufacturer and Distributor responsibilities is required to submit two separate reports. One report for processing fees and the other report for CRV.

Q: Do I have to report tasting room samples?

A: No, bottles opened and used as winery or distilled spirits tasting room samples don't need CRV or processing fees reported.

Q: Aside from tasting room samples, do I have to report other donated or giveaway bottles?

A: Yes, bottles of wine or distilled spirits donated or given away in California, require CRV and processing fees to be reported and paid.

Q: If my company is already registered and reporting as a Beverage Manufacturer and/or Distributor for other beverages, do I have to re- register for my wine and distilled spirits sales?

A: No if you are already registered you don't need to re-register. You will report the CRV and/or processing fees using your existing account numbers.

Q: Can you clarify who would pay processing fees if I am an out-of-state winery/distiller?

A: Out-of-state wineries and distilleries shipping only to California importers would not be registered with CalRecycle. The importer is deemed the Beverage Manufacturer responsible for processing fees on those products. However, an out of state winery holding a direct shippers permit, who sends wine direct to California consumers must register, and is responsible as both the beverage manufacturer and distributor on the items shipped to consumers.