



June 26, 2019

Alcohol and Tobacco Tax and Trade Bureau
Regulations and Rulings Division
1310 G Street NW
Washington, DC 20005

Re: Docket No. TTB-2018-007 NPR No. 176: Modernization of the Labeling and Advertising Regulations for Wine, Distilled Spirits, and Malt Beverages

On behalf of the Glass Packaging Institute (GPI), the North American trade association for the glass food and beverage container manufacturers and suppliers to the industry, I respectfully request promulgation of regulations to approve sales of wine in single-serve 250ml glass bottles.

Innovations in the wine and customer packaging markets have closely mirrored growing consumer preferences for smaller sized portions, and packaging that allows for convenient use and transport. The glass container industry continues to innovate, accommodate and produce glass bottles and jars to match smaller portion sizes across beverage markets.

Adding 250ml to the standards of fill would streamline label approval, and eliminate the need to apply for “aggregate packaging” approval. It will also help the Bureau avoid duplicative applications, and encourage temperate consumption among consumers.

Glass Bottles Provide Long Lasting Environmental Benefits

An environmentally friendly choice, glass bottles are highly inert, domestically (and often regionally) sourced, and protecting wine, and other contents held from ultraviolet light.

Glass packaging is 100% and endlessly recyclable, with the average glass bottle or jar containing 31% recycled glass content. In some areas of the country, including California, the country’s greatest wine producing state, the recycled content of a glass bottle or jar is over 40%. Recognizing these qualities, state and local governments, as well as brands, often include increased and sustained use of glass bottles as one avenue to achieve sustainability mandates and goals.

When properly stored, most wine varietals in glass can last 1 to 2 years past their stated “use by” date, with fine wines lasting decades past their sell date. Wine packaged in glass bottles is rarely discarded by consumers due to expiration issues.

The Glass Container Industry is Positioned for a Smaller Packaging Format

Our glass producing member companies understand the importance of designing

containers to fit existing packaging infrastructure. They frequently adjust production lines for glass bottles and jars of all sizes.

For example, 250ml glass bottles can be designed to fit existing 750ml fill lines at wineries, making filling more economical for the winemaker. In comparison to the 375ml bottle, the 250ml size presents the opportunity to offer quality wine at a more accessible price point and accompanying smaller portion size.

The 250ml single-serve size is permitted in other major wine producing regions; Europe, Mexico and Latin America among them. Approval for sale in the US as individual units versus multi-packs decreases the need for excessive secondary packaging, and reduces the overall environmental impact of the glass bottle.

Other beverage categories have introduced new package formats and sizes, particularly in the non-alcoholic beverage market. The trend to smaller packaging formats continues to grow, proving to be a solid marketing choice, rather than a passing trend.

Consumer Preference for Glass Wine Bottles

Consumer preference for wine packaging is also an important component for the Bureau to consider.

A nationwide October 2016 poll, conducted by SurveyUSA, found that 95% of wine drinkers prefer drinking wine that comes in a glass bottle, with taste (80%) and quality (81%) as the top reasons. 55% of poll respondents also believe that glass wine bottles are the most sustainable food and beverage packaging format.

Ensuring glass remains an option in the 250ml single-serving format meets this considerable consumer demand.

Thank you for your consideration of our comments.

Sincerely,



Joseph J. Cattaneo
President