

DIVISION OF ALCOHOL AND TOBACCO CONTROL

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INDUSTRY CIRCULAR

Combination Packaging

Recently the Division held a training event in St. Louis where we made a statement inconsistent with our position on combination packaging as provided by Section [311.070.4\(8\)](#), RSMo. ATC stated that intoxicating beverages packaged with non-alcoholic merchandise sold jointly to consumers must be approved by ATC for sale in Missouri. In fact, this is not always required. ATC is providing additional clarification to clear up any confusion on combination packaging.

Section 311.070.4(8) provides:

“(8) The distiller, wholesaler, winemaker or brewer may package and distribute intoxicating beverages in combination with other nonalcoholic items as originally packaged by the supplier for sale ultimately to consumers; notwithstanding any provision of law to the contrary, for the purpose of this subsection, intoxicating liquor and wine wholesalers are not required to charge for nonalcoholic items any more than the actual cost of purchasing such nonalcoholic items from the supplier;”

Combination packages must be originally packaged by the supplier or solicitor and an up charge must be passed on to retailers as a separate charge on the wholesalers' invoices. However, if the label does not change, or fits within the list of allowable changes to already approved labels, it is not necessary to brand register combination packages with ATC.

If you have any questions, feel free to contact the Division.

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