

March 29, 2024

Regulations and Ruling Division
Alcohol and Tobacco Tax and Trade Bureau
1310 G Street NW, Box 12
Washington, DC 20005

**Comment on Labeling and Advertising of Wine, Distilled Spirits, and Malt Beverages with
Alcohol Content, Nutritional Information, Major Food Allergens, and Ingredients
(Docket No. TTB-2024-0002)**

Current alcohol labels do not provide the information that consumers need to make informed purchasing and consumption decisions. The undersigned organizations call on the Alcohol and Tobacco Tax and Trade Bureau (TTB) to expeditiously propose rules mandating on-package labeling of alcohol content, nutritional information, major food allergens, and ingredients.

Alcohol content information is necessary to fully inform consumers and help them consume alcohol in safe amounts and prevent alcohol-related accidents and deaths. The Dietary Guidelines for Americans (DGA) recommend that adults who choose to drink alcohol should limit intake to 2 drinks or less in a day for men and 1 drink or less in a day for women (on the days in which alcohol is consumed).¹ Other health authorities have adopted stricter recommendations (*e.g.*, Canada's guidance recommends 2 standard drinks or less per week).² Unfortunately, many Americans drink in excess of recommended guidelines.³

The DGA define a standard drink as 0.6 fluid ounces of pure alcohol,⁴ and consumers may not realize that what appears to be a single-serving beverage may actually contain multiple standard drinks. Labels need to provide alcohol content information that enables responsible drinking. This includes the percent alcohol by volume, serving size, number of servings per container, and the number of standard drinks per serving and per container. Labels should also have a statement about moderate drinking guidelines to contextualize the standard drink disclosures.

Alcohol is calorie-dense and contributes substantially to the average daily energy intake of those who drink,⁵ but most alcoholic beverages lack calorie labeling.⁶ Many alcoholic beverages also contain carbohydrates, sugars, and other nutrients, but lack any nutrition labeling.⁷ Sugar-sweetened beverages contribute to weight gain, type 2 diabetes, and heart disease,⁸ and sugary ready-to-drink cocktails are increasing in popularity.⁹ Some 12-oz canned cocktails¹⁰ have more than triple the calories and almost as much sugar as a 12-oz Coca-Cola.¹¹ These and all other alcoholic beverages should be required to label calories and nutritional information. The minority of alcoholic beverages regulated by the U.S. Food and Drug Administration (FDA) already includes such labeling; those regulated by TTB should not be an exception.

Wine, beer, and distilled spirits can also contain a wide range of ingredients and food additives,¹² but most are not currently required to be disclosed. Alcoholic beverages can contain major food allergens like wheat, milk, egg, nuts, and shellfish, awareness of which can be a matter of life or death for people with food allergies. Beyond the nine major food allergens recognized by the FDA, over 160 foods reportedly cause allergic reactions, underscoring the need for mandatory full ingredients lists.¹³

In a March 2024 poll of 1,509 adults who drink alcohol, 88% of consumers said ingredients information would be important for deciding whether to purchase a particular alcoholic beverage (31% said extremely important, 30% very important, 27% somewhat important).¹⁴ Strong majorities (78-91%) also said alcohol content, calorie content, nutritional content, and allergens would be at least somewhat important for their alcohol purchasing decisions.

For alcohol content, calories, nutrition, allergens, and ingredients information to be accessible to all, it is vital that TTB require they appear on the physical label of each container. TTB should not allow companies to place technological barriers between consumers and health and safety-related product information by only giving access to this information through QR codes or websites. In the same poll mentioned above, 76% of consumers said they would prefer to learn about ingredients, alcohol content, allergens, calories, and nutritional content of alcoholic beverages by reading this information on the label of a container (as opposed to scanning a QR code, visiting a website, or not learning about the information at all).¹⁵

We urge TTB to prioritize transparency and health over corporate interests and require comprehensive labeling on the containers of all alcoholic beverages to ensure that Americans can make more informed decisions about what and how much to drink.

Sincerely,

Organizations

Alcohol Justice

Allergy & Asthma Network

American Public Health Association

American Society for Nutrition

Association of State Public Health Nutritionists

Asthma and Allergy Foundation of America

Berkeley Media Studies Group

Beyond Celiac

Celiac Disease Foundation

Center for Science in the Public Interest

Center for Wellness and Nutrition, a program of the Public Health Institute

Consumer Reports

CURED Nfp (Campaign Urging Research for Eosinophilic Diseases)

Elijah-Alavi Foundation Inc.

FARE (Food Allergy Research and Education)

Food Allergy & Anaphylaxis Connection Team (FAACT)

Food Equality Initiative

The FPIES Foundation

Gluten Free Watchdog, LLC

Gluten Intolerance Group of North America

Healthy Food America

Laurie M. Tisch Center for Food, Education & Policy, Teachers College, Columbia University

Leaders Advancing and Helping Communities

National Celiac Association

National Consumers League

Northwestern Feinberg School of Medicine & Ann & Robert H. Lurie Children's Hospital of Chicago

U.S. Alcohol Policy Alliance

Individuals

Jennifer Falbe

Associate Professor, University of California, Davis

Kaela Plank
Public Health Researcher

Laura Schmidt
Professor, University of California at San Francisco

Lauren Haynes
Legendary Health

Lisa R. Young, PhD, RDN
Adjunct professor of Nutrition, New York University

Roberto Vargas
Associate Director, Community Partnerships, University of California San Francisco Center for Community Engagement

Thomas K. Greenfield, PhD
Senior Scientist, Alcohol Research Group, Public Health Institute

Tim Naimi
Adjunct Professor of Medicine, Boston University School of Medicine

References

- ¹ <https://www.dietaryguidelines.gov/>
- ² <https://www.ccsa.ca/canadas-guidance-alcohol-and-health>
- ³ <https://onlinelibrary.wiley.com/doi/10.1111/acer.14944>
- ⁴ <https://www.dietaryguidelines.gov/>
- ⁵ https://www.dietaryguidelines.gov/sites/default/files/2020-07/PartD_Ch11_AlcoholicBev_first-print.pdf
- ⁶ <https://doi.org/10.1016/j.cdnut.2023.101654>
- ⁷ <https://www.cspinet.org/article/which-alcoholic-beverages-have-most-or-least-calories>
- ⁸ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6723421/>
- ⁹ <https://www.distilledspirits.org/news/distilled-spirits-council-annual-economic-briefing-reaching-historic-milestone-u-s-spirits-revenues-take-share-lead-of-total-u-s-beverage-alcohol-market-in-2022/>
- ¹⁰ <https://www.cutwaterspirits.com/canned-cocktails/pina-colada>
- ¹¹ <https://smartlabel.coca-colaproductfacts.com/nutrition/index.html?CocaCola-6760fluidounce&upc=049000050103>
- ¹² 27 C.F.R § 24.246 (c); 27 C.F.R. § 25.15; <https://www.ttb.gov/scientific-services-division/limited-ingredients>
- ¹³ <https://www.tandfonline.com/doi/abs/10.1080/10408399609527760>
- ¹⁴ Big Village’s CARAVAN U.S. Online Omnibus Survey, administered March 15-20, 2024. Survey question asked: “Please indicate how important each of the pieces of information below would be in helping you decide whether to purchase a particular alcoholic beverage.”
- ¹⁵ Big Village’s CARAVAN U.S. Online Omnibus Survey, administered March 15-20, 2024. Survey question asked: “How would you prefer to learn about the ingredients, alcohol content, allergens, calories, and nutritional content of an alcoholic beverage?” (a. Read this information on the label of the container; b. Scan a QR code on the label; c. Visit a website address provided on the label; d. I do not want to learn this information)