

March 29, 2024
Division of Dockets Management
Alcohol and Tobacco Tax and Trade Bureau
U.S. Department of Treasury
1500 Pennsylvania Ave., N.W.
Washington, D.C. 20220

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)

We are writing to provide feedback on TTB's questions regarding labeling of alcoholic beverages with alcohol content, nutritional information, major food allergens, and ingredients.

Current alcohol labels do not provide the information that consumers need to make informed purchasing and consumption decisions. The undersigned 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 help people make informed decisions about their alcohol consumption and prevent alcohol-related accidents and deaths. While there is no established level of alcohol consumption that is considered safe,¹ the health risks associated with alcohol tend to rise with consumption levels² – thus, consumers should be informed about the amount of alcohol in alcoholic beverages. The Dietary Guidelines for Americans (DGA) recommend that adults who choose to drink alcohol should limit intake to 2 drinks or less per day for men and 1 drink or less per day for women (on the days in which alcohol is consumed).³ Other health authorities have adopted stricter recommendations; Canada's guidance, for example, recommends 2 standard drinks or less per week.⁴ Unfortunately, many Americans drink in excess of recommended guidelines.⁵

The DGA define a standard drink as 0.6 fluid ounces of pure alcohol. However, consumers may not realize that what appears to be a single-serving beverage may contain multiple standard drinks. Labels need to provide alcohol content information that enables well-informed decisions about 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.

Alcohol is calorie-dense and contributes substantially to the average daily energy intake of those who drink.⁶ Many alcoholic beverages also contain carbohydrates, sugars, and other nutrients. However, most alcoholic beverages lack any nutrition labeling,⁷ making it challenging for consumers to make informed decisions about their calorie intake when drinking. 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.

Wine, beer, and distilled spirits can also contain a wide range of ingredients and food additives,¹² but most ingredients and additives are not currently required to be disclosed. Alcoholic

beverages can also contain major food allergens like wheat, milk, egg, nuts, and shellfish. Knowing which beverages contain these allergens can be a matter of life or death for people with food allergies. Beyond the nine major food allergens recognized by the U.S. Food and Drug Administration (FDA), over 160 foods have reportedly cause allergic reactions, underscoring the need for full mandatory ingredients lists.¹³ However, alcoholic beverage retailers are not required to disclose whether their products contain these allergens.

The public wants to have more transparent information on alcohol labels. 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 this information appear on the physical label of each container. The alcohol industry has argued for the use of QR codes in lieu of mandatory package labeling. 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 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,

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Note: The views expressed in this comment letter are those of its authors only. This letter is not submitted on behalf of The University of North Carolina at Chapel Hill or Stanford University.

References

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- 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)