

July 6, 2022

The Honorable Rosa Delauro  
Chairwoman  
Committee on Appropriations  
U.S. House of Representatives  
H-307 The Capitol  
Washington, DC 20515

The Honorable Kay Granger  
Ranking Member  
Committee on Appropriations  
U.S. House of Representatives  
H-307 The Capitol  
Washington, DC 20515

The Honorable Mike Quigley  
Chairman  
Financial Services and General Government  
Subcommittee  
2000 Rayburn House Office Building  
Washington, DC 20515

The Honorable Steve Womack  
Ranking Member  
Financial Services and General Government  
Subcommittee  
2000 Rayburn House Office Building  
Washington, DC 20515

Dear Chairman Delauro, Ranking Member Granger and Representatives Quigley and Womack:

The undersigned organizations urge the United States Congress to ensure that the estimated 69.5 percent of U.S. adults who drink alcoholic beverages<sup>1</sup> – more than 170 million people<sup>2</sup> – have access to mandatory standardized alcohol labeling on all beer, wine and distilled spirits products, addressing a gap that has hampered consumers from making informed drinking decisions.

Consumer, public health, medical and nutrition organizations have been pressing for comprehensive alcohol labeling for almost two decades. In fact, in 2003, the Center for Science in the Public Interest (CSPI) and the National Consumers League (NCL) first petitioned the lead federal agency that regulates beer, wine and distilled spirits – the Alcohol and Tobacco Tax and Trade Bureau (TTB) within the Treasury Department – to require an easy-to-read, standardized “Alcohol Facts” label on all beer, wine and distilled spirits products.<sup>3</sup>

---

<sup>1</sup> National Institute on Alcohol Abuse and Alcoholism. Alcohol Facts and Statistics. March 2022.  
<https://www.niaaa.nih.gov/publications/brochures-and-fact-sheets/alcohol-facts-and-statistics>. Accessed June 2, 2022.

<sup>2</sup> Based on 69.5% of 258.3 million US adults aged 18 and above living in the US in 2020. US Census Bureau. Population by Age Group: 2000, 2010, 2020. August 21, 2021.  
<https://www.census.gov/library/stories/2021/08/united-states-adult-population-grew-faster-than-nations-total-population-from-2010-to-2020.html>. Accessed June 2, 2022.

<sup>3</sup> Center for Science in the Public Interest. Petition to Improve Mandatory Label Information on Alcoholic Beverages. December 16, 2003.  
<https://www.cspinet.org/sites/default/files/media/documents/resource/031216IngLabelingPetition.pdf>

Specifically, the petition called for a label format similar to the popular “Nutrition Facts” panel on foods and nonalcoholic beverages. As such, the label would list such basic information as the serving size, amount of alcohol and calories per serving, the percent alcohol by volume, the number of standard drinks per container, an ingredients list, and other needed information to make responsible drinking decisions.

Polling by the Beer Institute, a trade association, shows that 75 percent of Americans think alcoholic beverages should have standardized alcohol content labels and 72 percent say this labeling will encourage responsible alcohol use.<sup>4</sup> And yet, TTB has forestalled action on mandatory labeling, despite having the statutory authority to do so under the Federal Alcohol Administration Act (FAA). TTB’s solution is a voluntary rule that allows companies to put nutrition and calorie information on their products if they so choose.<sup>5</sup> The problem is many manufacturers have opted out, meaning many products remain unlabeled. Moreover, under TTB’s rule there is no standard format for where and how nutritional disclosures appear, making it hard to for consumers to find information easily and compare different brands.

The Food and Drug Administration (FDA) also has authority over the labeling of some alcoholic beverage products, notably hard ciders, wine coolers, other wines containing less than 7 percent alcohol by volume and beers not made from malted barley or hops. On these alcoholic beverages, FDA requires the same Nutrition Facts panel and ingredients statements as what appears on nonalcoholic beverages, from soft drinks to juices, and alcohol companies comply. Thus, there is proof that manufacturers have the capability to put a standardized “Alcohol Facts” label on other beer, wine and distilled spirits products – many just prefer not to.

Enhanced transparency in alcohol labeling is a critical measure for addressing excess alcohol consumption, a costly public health problem that increases the risk for alcohol- and diet-related diseases and serious injury. Alcohol is a source of empty calories that contribute to obesity,<sup>6</sup> and can impact blood sugar control in people with diabetes.<sup>7</sup> Additionally, alcohol is a roadway killer accounting for about 30 percent of all traffic crash fatalities in the U.S.,<sup>8</sup> and excessive drinking increases the risk of liver disease, hypertension, cardiovascular disease, alcohol use disorders, certain cancers and severe injuries.<sup>9</sup> Even alcohol use consistent with the current Dietary Guidelines for Americans increases the risk

---

<sup>4</sup> Beer Institute. Press Release. New Report Shows Beer Leads All Alcohol Categories In Providing Nutritional Information to Consumers. August 4, 2021. <https://www.beerstitute.org/press-releases/new-report-shows-beer-leads-all-alcohol-categories-in-providing-nutritional-information-to-consumers/>. Accessed June 2, 2022.

<sup>5</sup> U.S. Department of the Treasury, Alcohol and Tobacco Tax and Trade Bureau, TTB Ruling No. 2013-2, May 28, 2013.

<sup>6</sup> Robinson E, et al. Alcohol, calories and obesity: A rapid systematic review and meta-analysis of consumer knowledge, support and behavioral effects of energy labeling on alcoholic drinks. *Obesity Reviews*. 2021 Jun;22(6):e13198.

<sup>7</sup> Emanuele NV, et al. Consequences of Alcohol Use in Diabetics. *Alcohol Health Res World*. 1998; 22(3): 211–219.

<sup>8</sup> National Highway Traffic Safety Administration. Risky Drunk and Drugged Driving Statistics.

<sup>9</sup> U.S. Centers for Disease Control and Prevention. Alcohol and Public Health. Last reviewed April 14, 2022. <https://www.cdc.gov/alcohol/fact-sheets/alcohol-use.htm> Accessed June 7, 2022.

of breast, colorectal, head and neck, and esophageal cancers,<sup>10</sup> some of the leading cancer types.

Consequently, an estimated 140,000 people in the United States die annually from alcohol-related causes,<sup>11</sup> which is why the cost of excessive alcohol use reached \$249 billion in 2010 and is likely higher today.<sup>12</sup>

Also, unlike other foods and beverages, beer, wine and distilled spirits are not required to declare the presence of major allergens, which may be used as processing agents or as ingredients.<sup>13,14,15</sup> The disclosure of allergen information is a life-and-death matter for some consumers and the reason why the Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA) requires allergen labeling on all FDA-regulated foods and beverages. However, FALCPA does not apply to alcoholic beverages and even though a House committee report for the bill stated Congress' intent that TTB develop allergen labeling requirements for beer, wine and distilled spirits,<sup>16</sup> TTB has not finalized a mandatory rule.

For 19 years, the consumer, nutrition and public health communities have been pressing TTB to issue a final rule requiring standardized and complete alcohol labeling and it seems that public pressure alone is not enough to get TTB to act. Therefore, our organizations are turning to Congress to champion mandatory Alcohol Facts labeling as a priority for adult Americans. Access to this information is long overdue and will significantly advance important public health goals.

Sincerely,

- Academy of Nutrition and Dietetics
- Advocates for Better Children's Diets
- Asthma and Allergy Foundation of America
- Alcohol Justice
- American Academy of Family Physicians
- American College of Preventive Medicine
- American Institute for Cancer Research
- Center for Science in the Public Interest
- Consumer Federation of America

---

<sup>10</sup> American Institute for Cancer Research/ World Cancer Research Fund. Continuous Update Project: Alcoholic Drinks. 2018. Available at <https://www.aicr.org/research/the-continuous-update-project/alcoholic-drinks/>.

<sup>11</sup> U.S. Centers for Disease and Control Prevention. Deaths from Excessive Alcohol Use in the U.S. Page last reviewed April 14, 2021. <https://www.cdc.gov/alcohol/features/excessive-alcohol-deaths.html> . Accessed June 2, 2022.

<sup>12</sup> U.S. Centers for Disease Control and Prevention. Alcohol and Public Health. Page last reviewed April 14, 2022. . <https://www.cdc.gov/alcohol/features/excessive-drinking.html>. Accessed June 2, 2022.

<sup>13</sup> Deckwart M, et al, 2014b. Impact of wine manufacturing practice on the occurrence of fining agents with allergenic potential. *Food Addit Contam A* 31(11):1805–17.

<sup>14</sup> Uberti F, et al. 2014. Immunochemical investigation of allergenic residues in experimental and commercially-available wines fined with egg white proteins. *Food Chem* 159(0):343–52.

<sup>15</sup> Stockley CS, et al. 2015. Adverse food reactions from consuming wine. *Aust J Grape Wine Res* 21:568–81.

<sup>16</sup> H.R. Rep. No. 608, 108th Cong., 2d Sess., at 3 (2004)

- Consumer Reports
- Families USA
- Food Allergy Research and Education
- HealthyWomen
- Global Liver Institute
- National Alliance for Hispanic Health
- National Association of Pediatric Nurse Practitioners
- National Center for Health Research
- National Consumers League
- Preventive Cardiovascular Nurses Association
- Public Good Law Center
- Sumner M. Redstone Global Center for Prevention and Wellness
- The Obesity Society
- US Alcohol Policy Alliance

July 6, 2022

The Honorable Patrick Leahy  
Chairman  
Senate Committee on Appropriations  
Room S-128  
The Capitol  
Washington, DC 20510

The Honorable Richard Shelby  
Vice Chairman  
Senate Committee on Appropriations  
Room S-128  
The Capitol  
Washington, DC 20510

The Honorable Chris Van Hollen  
Chair  
Financial Services and General Government  
Subcommittee  
Room S-128, The Capitol  
Washington, DC 20510

The Honorable Cindy Hyde-Smith  
Ranking Member  
Financial Services and General Government  
Subcommittee  
Room S-128, The Capitol  
Washington, DC 20510

Dear Chairman Leahy, Vice Chair Shelby, and Senators Van Hollen and Hyde-Smith:

The undersigned organizations urge the United States Congress to ensure that the estimated 69.5 percent of U.S. adults who drink alcoholic beverages<sup>1</sup> – more than 170 million people<sup>2</sup> – have access to mandatory standardized alcohol labeling on all beer, wine and distilled spirits products, addressing a gap that has hampered consumers from making informed drinking decisions.

Consumer, public health, medical and nutrition organizations have been pressing for comprehensive alcohol labeling for almost two decades. In fact, in 2003, the Center for Science in the Public Interest (CSPI) and the National Consumers League (NCL) first petitioned the lead federal agency that regulates beer, wine and distilled spirits – the Alcohol and Tobacco Tax and Trade Bureau (TTB) within the Treasury Department – to require an easy-to-read, standardized “Alcohol Facts” label on all beer, wine and distilled spirits products.<sup>3</sup>

Specifically, the petition called for a label format similar to the popular “Nutrition Facts” panel on foods and nonalcoholic beverages. As such, the label would list such basic information as the serving size, amount of alcohol and calories per serving, the percent

---

<sup>1</sup> National Institute on Alcohol Abuse and Alcoholism. Alcohol Facts and Statistics. March 2022.  
<https://www.niaaa.nih.gov/publications/brochures-and-fact-sheets/alcohol-facts-and-statistics>. Accessed June 2, 2022.

<sup>2</sup> Based on 69.5% of 258.3 million US adults aged 18 and above living in the US in 2020. US Census Bureau. Population by Age Group: 2000, 2010, 2020. August 21, 2021.  
<https://www.census.gov/library/stories/2021/08/united-states-adult-population-grew-faster-than-nations-total-population-from-2010-to-2020.html>. Accessed June 2, 2022.

<sup>3</sup> Center for Science in the Public Interest. Petition to Improve Mandatory Label Information on Alcoholic Beverages. December 16, 2003.  
<https://www.cspinet.org/sites/default/files/media/documents/resource/031216IngLabelingPetition.pdf>

alcohol by volume, the number of standard drinks per container, an ingredients list, and other needed information to make responsible drinking decisions.

Polling by the Beer Institute, a trade association, shows that 75 percent of Americans think alcoholic beverages should have standardized alcohol content labels and 72 percent say this labeling will encourage responsible alcohol use.<sup>4</sup> And yet, TTB has forestalled action on mandatory labeling, despite having the statutory authority to do so under the Federal Alcohol Administration Act (FAA). TTB's solution is a voluntary rule that allows companies to put nutrition and calorie information on their products if they so choose.<sup>5</sup> The problem is many manufacturers have opted out, meaning many products remain unlabeled. Moreover, under TTB's rule there is no standard format for where and how nutritional disclosures appear, making it hard to for consumers to find information easily and compare different brands.

The Food and Drug Administration (FDA) also has authority over the labeling of some alcoholic beverage products, notably hard ciders, wine coolers, other wines containing less than 7 percent alcohol by volume and beers not made from malted barley or hops. On these alcoholic beverages, FDA requires the same Nutrition Facts panel and ingredients statements as what appears on nonalcoholic beverages, from soft drinks to juices, and alcohol companies comply. Thus, there is proof that manufacturers have the capability to put a standardized "Alcohol Facts" label on other beer, wine and distilled spirits products – many just prefer not to.

Enhanced transparency in alcohol labeling is a critical measure for addressing excess alcohol consumption, a costly public health problem that increases the risk for alcohol- and diet-related diseases and serious injury. Alcohol is a source of empty calories that contribute to obesity,<sup>6</sup> and can impact blood sugar control in people with diabetes.<sup>7</sup> Additionally, alcohol is a roadway killer accounting for about 30 percent of all traffic crash fatalities in the U.S.,<sup>8</sup> and excessive drinking increases the risk of liver disease, hypertension, cardiovascular disease, alcohol use disorders, certain cancers and severe injuries.<sup>9</sup> Even alcohol use consistent with the current Dietary Guidelines for Americans increases the risk of breast, colorectal, head and neck, and esophageal cancers,<sup>10</sup> some of the leading cancer types.

---

<sup>4</sup> Beer Institute. Press Release. New Report Shows Beer Leads All Alcohol Categories In Providing Nutritional Information to Consumers. August 4, 2021. <https://www.beerinstitute.org/press-releases/new-report-shows-beer-leads-all-alcohol-categories-in-providing-nutritional-information-to-consumers/>. Accessed June 2, 2022.

<sup>5</sup> U.S. Department of the Treasury, Alcohol and Tobacco Tax and Trade Bureau, TTB Ruling No. 2013-2, May 28, 2013.

<sup>6</sup> Robinson E, et al. Alcohol, calories and obesity: A rapid systematic review and meta-analysis of consumer knowledge, support and behavioral effects of energy labeling on alcoholic drinks. *Obesity Reviews*. 2021 Jun;22(6):e13198.

<sup>7</sup> Emanuele NV, et al. Consequences of Alcohol Use in Diabetics. *Alcohol Health Res World*. 1998; 22(3): 211–219.

<sup>8</sup> National Highway Traffic Safety Administration. Risky Drunk and Drugged Driving Statistics.

<sup>9</sup> U.S. Centers for Disease Control and Prevention. Alcohol and Public Health. Last reviewed April 14, 2022. <https://www.cdc.gov/alcohol/fact-sheets/alcohol-use.htm> Accessed June 7, 2022.

<sup>10</sup> American Institute for Cancer Research/ World Cancer Research Fund. Continuous Update Project: Alcoholic Drinks. 2018. Available at <https://www.aicr.org/research/the-continuous-update-project/alcoholic-drinks/>.

Consequently, an estimated 140,000 people in the United States die annually from alcohol-related causes,<sup>11</sup> which is why the cost of excessive alcohol use reached \$249 billion in 2010 and is likely higher today.<sup>12</sup>

Also, unlike other foods and beverages, beer, wine and distilled spirits are not required to declare the presence of major allergens, which may be used as processing agents or as ingredients.<sup>13,14,15</sup> The disclosure of allergen information is a life-and-death matter for some consumers and the reason why the Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA) requires allergen labeling on all FDA-regulated foods and beverages. However, FALCPA does not apply to alcoholic beverages and even though a House committee report for the bill stated Congress' intent that TTB develop allergen labeling requirements for beer, wine and distilled spirits,<sup>16</sup> TTB has not finalized a mandatory rule.

For 19 years, the consumer, nutrition and public health communities have been pressing TTB to issue a final rule requiring standardized and complete alcohol labeling and it seems that public pressure alone is not enough to get TTB to act. Therefore, our organizations are turning to Congress to champion mandatory Alcohol Facts labeling as a priority for adult Americans. Access to this information is long overdue and will significantly advance important public health goals.

Sincerely,

- Academy of Nutrition and Dietetics
- Advocates for Better Children's Diets
- Asthma and Allergy Foundation of America
- Alcohol Justice
- American Academy of Family Physicians
- American College of Preventive Medicine
- American Institute for Cancer Research
- Center for Science in the Public Interest
- Consumer Federation of America
- Consumer Reports
- Families USA
- Food Allergy Research and Education
- HealthyWomen

---

<sup>11</sup> U.S. Centers for Disease and Control Prevention. Deaths from Excessive Alcohol Use in the U.S. Page last reviewed April 14, 2021. <https://www.cdc.gov/alcohol/features/excessive-alcohol-deaths.html> . Accessed June 2, 2022.

<sup>12</sup> U.S. Centers for Disease Control and Prevention. Alcohol and Public Health. Page last reviewed April 14, 2022. . <https://www.cdc.gov/alcohol/features/excessive-drinking.html>. Accessed June 2, 2022.

<sup>13</sup> Deckwart M, et al, 2014b. Impact of wine manufacturing practice on the occurrence of fining agents with allergenic potential. *Food Addit Contam A* 31(11):1805–17.

<sup>14</sup> Uberti F, et al. 2014. Immunochemical investigation of allergenic residues in experimental and commercially-available wines fined with egg white proteins. *Food Chem* 159(0):343–52.

<sup>15</sup> Stockley CS, et al. 2015. Adverse food reactions from consuming wine. *Aust J Grape Wine Res* 21:568–81.

<sup>16</sup> H.R. Rep. No. 608, 108th Cong., 2d Sess., at 3 (2004)

- Global Liver Institute
- National Alliance for Hispanic Health
- National Association of Pediatric Nurse Practitioners
- National Center for Health Research
- National Consumers League
- Preventive Cardiovascular Nurses Association
- Public Good Law Center
- Sumner M. Redstone Global Center for Prevention and Wellness
- The Obesity Society
- US Alcohol Policy Alliance