



State of Connecticut

HOUSE OF REPRESENTATIVES

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REPRESENTATIVE ANDREW M. FLEISCHMANN
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August 8, 2005

Chief, Regulations & Procedures Division
Alcohol & Tobacco Tax & Trade Bureau
ATTN: Notice No. 41
P.O. Box 14412
Washington DC 20044-4412

Dear Sir:

I write in regard to your bureau's interpretation of current federal regulations regarding alcoholic beverages.

According to the latest information I have received, your division has interpreted current regulations as not allowing most beer, wine and distilled spirits companies to provide detailed information to consumers about their products. I find this interpretation of federal regulations deeply troubling; more information on labels will allow consumers to make informed choices about what – and how much – to drink. TTB is to be commended for seeking public comment on this proposed change in regulations.

Food, soft drinks, and over-the-counter medications offer consumers basic information on their labels. Alcoholic beverages, with just a few exceptions, are the only class of consumable goods that do *not* provide this type of information. TTB should allow manufacturers to list product information on the label – serving size, servings per container, alcohol content, calories, fat, carbohydrates and protein per serving – if they wish to do so.

All of the information listed above should be available to consumers. Of all these different types of information, the amount of alcohol per serving is the most important – as it would allow consumers to assess their intake, and thus minimize their risks.

The U.S. government's advice on moderate drinking, as provided in *Dietary Guidelines for Americans* (USDA & HHS, 2005) reads as follows:

The majority of American adults consume alcohol. Those who do so should drink alcoholic beverages in moderation. Moderation is defined as the consumption of up to one drink per day for women and up to two drinks per day for men. Twelve fluid ounces of regular beer, 5 fluid ounces of wine, or 1.5 fluid ounces of 80-proof distilled spirits count as one drink for purposes of explaining moderation. (p. 44)

Permitting placement of information regarding alcohol per serving and servings per container on beer, wine and distilled spirits labels will allow consumers to follow the advice our government provides. Given the wide variety of container sizes and alcohol concentrations in today's products, and the regulatory disparities as to what information may be placed on beer, wine and distilled spirit labels, most of my constituents would welcome more information about how particular products relate to the *Dietary Guidelines*.

Consumer Serving Facts will be more meaningful if TTB makes clear in its rulemaking what constitutes a "serving." This is the essential fact that will allow consumers to make more informed comparisons between products and better understand what is in a standard serving of any alcohol beverage.

The standard serving definition used in the *Dietary Guidelines* (12 ounces of regular beer, 5 ounces of table wine and 1.5 ounces of 80 proof distilled spirits) is one widely used by U.S. government agencies, public health groups, consumer groups, and a majority of state driver's license manuals. It makes sense to use the same definition as the benchmark for labels.

I strongly urge your bureau to act quickly and promulgate a regulation that permits meaningful consumer-oriented serving facts on beer, wine and spirits labels. In the meantime, I urge TTB to allow manufacturers to provide this kind information on labels while the rulemaking process proceeds. To prevent manufacturers who wish to provide this information from doing so would ill serve the public.

Thank you very much for your consideration of my views in this matter.

Sincerely,



Andrew Fleisli
State Representative 1
8th Assembly District