

# American Institute for Cancer Research

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August 17, 2005

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

Re: Notice No. 41

Dear Sir or Madam:

As one of the nation's largest cancer charities, the American Institute for Cancer Research (AICR) focuses on the link between diet and cancer, which is why our organization is writing this letter urging TTB to require a mandatory "Alcohol Facts" panel on the labels of all alcoholic beverages. At a time when the ageing American population is recognizing that diet and physical activity are directly connected to chronic disease and overweight and obesity, having standardized information about the alcohol and calorie content on the labels of beer, wine and distilled spirits products will be an important way for all of us to make better informed decisions about how much beverage alcohol we consume.

Cancer is the second leading cause of death in the United States and there is convincing evidence that alcohol consumed in excessive amounts is linked to cancer of the mouth, pharynx, larynx, oesophagus and liver. The evidence for a link to colon, rectum and breast cancer is rated "probable," and the link to lung cancer, is rated "possible." To reduce risk of these cancers, AICR advises people to drink moderately, which is defined as no more than two standard drinks per day for men and one standard drink per day for women.

Because the majority of American adults consume beverage alcohol, AICR believes that the public would benefit from ready access to product labeling that would help them drink moderately. This label should include the caveat concerning two standard drinks per day for men and one for women—which is also the recommendation contained in the *Dietary Guidelines for Americans 2005*.

The high caloric load of alcoholic beverages, can contribute to overweight and obesity. and that, is also a factor to be considered in regard to cancer risk. Research funded by AICR and other institutions has shown that obesity fundamentally alters the body's metabolic and hormonal systems in ways that make cancer more likely. To date, the scientific evidence has consistently linked obesity to some of the most common cancers in the US: post-menopausal breast cancer, colon cancer, endometrial cancer, prostate cancer, pancreatic cancer, esophageal cancer and kidney cancer.

For this reason, it is more important than ever for labels on all beverage alcohol products to list the number of calories per serving. This information would make it possible for Americans to gauge the number of calories they are consuming and help them maintain a healthy weight.

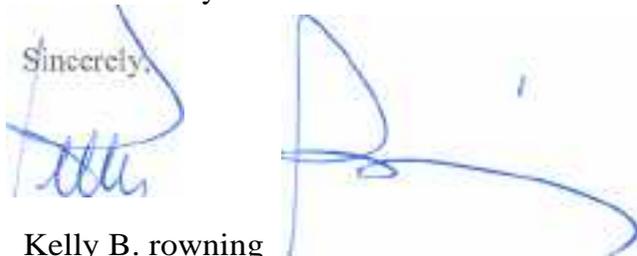
AICR suggests that TTB mandate an "Alcohol Facts" panel on all beverage alcohol products that would contain the following information in a standardized format:

- The serving size (i.e., 12 fluid ounces (fl oz) for beer, 5 fl oz for wine, and 1.5 fl oz for distilled spirits);
- The amount of alcohol (in fluid ounces per serving);
- The percentage alcohol by volume;
- The number of calories per serving;
- The definition of a "standard drink"; and
- The number of standard drinks per container
- The admonition to drink moderately with reference to the *Dietary Guidelines for Americans 2005*.

Because alcohol beverages may contain major food allergens, such as sulfites and glutens, it would also be helpful if TBB requires the labels of all alcoholic beverages to identify any major food allergens present in the product. The public has a right to know the ingredients used to make any product that is to be ingested. Identification of major food allergens is necessary to ensure that consumers with food allergies have the information they need to avoid those allergens.

Finally, AICR recognizes that finalizing this rulemaking is likely to take many years, which is why the organization urges TTB to issue an interim policy allowing bottlers to provide a definition of standard drink, a definition of moderate drinking, alcohol content, calorie and allergen information on their labels on a voluntary basis. Having this information, even on a voluntary basis, will help make the public aware of the need to learn about the alcohol and calorie content of the beverage alcohol products they consume. It will be a valuable first step in promoting healthy and informed purchasing and consumption decisions.

Thank ou for your consideration.

Sincerely,  


Kelly B. rowning  
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