



**Jon Peterson
State Representative,
2nd House District**

John J. Manfreda, Chief
Regulations & Procedures Division
Alcohol & Tobacco Tax & Trade Bureau
U.S. Treasury Department
ATTN: Notice No. 41
P.O. Box 14412
Washington DC 20044-4412
Dear Chief Manfreda:

Current federal alcohol beverage label regulations do not allow most beer, wine and distilled spirits' companies to provide information about their products so that consumers can make informed choices about what to drink and how much to drink. The Bureau is to be commended for seeking public comment on a proposed change in regulations which would address their concerns.

Food, soft drinks, over-the-counter drugs, and even dietary supplements provide consumers with basic consumer information on the label. Alcohol beverages (with some exceptions) are the only major class of consumable goods that do not provide this type of information on the label. The Bureau should allow companies voluntarily to list information such as serving size and servings per container, as well as alcohol, calories, fat, carbohydrates and protein content per serving.

Of all this information, the amount of alcohol per serving would be highly beneficial for consumers to have.

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

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)

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Allowing placement of information on alcohol per serving and servings per container on beer, wine and distilled spirits labels will help consumers better understand the government's recommendations. In fact, given the wide variety of formulations, 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 spirits labels, some consumers will welcome more information about how particular products relate to the *Guidelines'* advice.

Consumer Serving Facts will be more meaningful if The Bureau makes clear in this rulemaking what constitutes a "serving." This is an essential fact that will allow consumers to make more informed comparisons and choices between and among 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 urge The Bureau to act expeditiously to promulgate a regulation that permits meaningful consumer-oriented serving facts on beer, wine and spirits' labels. Meanwhile, I urge The Bureau to allow manufacturers to provide this kind of truthful, non-misleading information on labels as the rulemaking process proceeds.

Sincerely,

Jon Peterson