

MICHIGAN LICENSED BEVERAGE ASSOCIATION[®]

Retailers dedicated to the responsible sale and service of beverage alcohol

July 1, 2005

Comment 134

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

Dear Chief:

Under your regulations, most beer, wine and distilled spirits labels may not provide consumers with basic meaningful information as to what is in the product.

Most food packages, soft drink containers, 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 does not provide important information on the label, such as serving size, alcohol per serving, calories, fat and protein per serving, as well as allergens and ingredients.

Furthermore, existing label requirements for beer, wine and spirits are so disparate as to promote consumer confusion.

I believe providing basic consumer information is necessary so that consumers may make informed choices about what to drink and how much to drink. Caloric information per serving is important to anyone who is watching his or her diet. Alcohol per serving should be important to anyone trying to monitor his or her alcohol intake.

I urge TTB to act expeditiously to adopt a regulation that permits meaningful consumer-oriented Serving Facts on beer, wine, spirits labels. Meanwhile, I urge TTB to allow manufacturers voluntarily to provide this kind of truthful, non-misleading information on labels while the rulemaking process proceeds.

Sincerely,

MICHIGAN LICENSED BEVERAGE ASSOCIATION



Catherine A. Pavick
Executive Director