



SHAPE UP AMERICA!

September 13, 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

To Whom It May Concern:

As a former U.S. Surgeon General and a physician concerned about improving the public's health, I launched Shape Up America! to put the risks of excess weight, poor diet and inactivity into perspective for the public. Towards this end, Shape Up America! advocates for ready access to information that will make lifestyle changes readily achievable and attainable. In my capacity as the founder of Shape Up America!, I am writing to urge the Alcohol and Tobacco Tax and Trade Bureau's (TTB) to require a mandatory "Alcohol Facts" panel on the labels of all alcoholic beverages, regardless of product category. I would also recommend that while TTB works to implement a final rule making, the agency allow manufacturers to include labeling information on a voluntary basis that provides alcohol, calorie, and allergen information.

From the standpoint of improved public health, having complete information about the alcohol and calorie content of beer, wine and distilled spirits products is long overdue. Not only is alcohol a significant source of calories but excessive alcohol consumption makes it difficult to ingest sufficient nutrients within an individual's daily calorie allotment and to maintain a healthy weight. At the same time, all alcoholic beverages should be required to identify any major food allergens present in the product. Consumers have a right to know the ingredients used to make any product that is to be ingested.

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When I was Surgeon General, I communicated regularly with the public about health problems caused by excessive consumption of alcohol, such as increased risk of liver cirrhosis, hypertension, cancers of the upper gastrointestinal tract and serious injury caused by cognitive impairment. To reduce these health risks requires helpful and easily accessible information about the alcohol content of all beverage alcohol products, so that consumers can make responsible drinking decisions. Having improved labeling information about the alcohol content will also make it easier for consumers to follow the Dietary Guidelines' advice on moderate drinking. Potential benefits include reduced alcohol abuse, reduced drunk driving, and a reduction in the many diseases attributable to excessive alcohol intake.

At a time when health care is at the top of the political agenda, mandating an "Alcohol Facts" panel on the labels of all alcoholic beverages is a simple way to advance important public health goals. That is why I urge TTB to take action now.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "C. Everett Koop".

C. Everett Koop, MD
Founder
Shape Up America!
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Washington, DC 20006