

VHTA

Virginia Hospitality & Travel Association

July 27, 2005

Chief, Regulations & Procedures Division
Alcohol & Tobacco Tax & Trade Bureau
ATTN: Notice No. 41
P.O. Box 14412
Washington DC 20044-441.2

Dear Chief:

Thank you for this opportunity to share our support for allowing distilled spirits companies the choice of providing nutritional information on their products. The Virginia Hospitality and Travel Association (VHTA) is one of the largest retailer associations in the Commonwealth. The TTB is to be commended for seeking public comment on this proposed change in regulations.

From food and soft drinks to over-the-counter drugs and dietary supplements, consumers are provided basic nutritional information on the label. Unfortunately, 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 consumption.

For the most part, alcoholic beverages are the only major class of consumable goods that is not allowed to provide nutritional information on the label. VHTA firmly believes that it is in the consumer's best interest for the TTB to allow distilled spirits producers the ability to voluntarily list information such as serving size and servings per container, as well as alcohol, calories, fat, carbohydrates and protein per serving. Of all this information, the amount of alcohol per serving is the most beneficial for consumers.

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)

For consumers to better understand the advice provided by the government, the placement of information on alcohol per serving and servings per container on beer, wine and distilled spirits labels is necessary. 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 might welcome more information about how particular products relate to the *Guidelines'* advice.

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

As noted in the *Dietary Guidelines*, the standard serving definition (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 would seem reasonable for this definition to be used as the benchmark for labels.

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

Sincerely,

Julia Ciarlo Hammond
Director of Government Relations