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August 11, 2005

Chief, Regulations & Procedures Division
Alcohol & Tobacco Tax & Trade Bureau
Attn: Notice No. 41
PO Box 14412
Washington, D.C. 20044-4412

Dear Chief:

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.

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. 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, fluid ounces of wine, or 1.5 fluid ounces of 80-proof distilled spirits count as one drink for purposes of explaining moderation. (pg.44)

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 TTB makes it clear in this rulemaking what constitutes a "serving". This is the essential fact that will allow consumers to make more informed comparisons between products and better understand what is in a standard serving of any alcohol beverage.

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

Sincerely,


Tom Cross
House Republican Leader
State Representative, 84th District