

VENTURA COUNTY ALCOHOL AND DRUG ADVISORY BOARD
300 N. HILLMONT AVENUE
VENTURA, CA 93003
(805) 652-6737

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District 5

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At-Large

Vacant Member-
at-Large

BHD Director
Linda Shulman

Management Asst.
Ilene De La Torre

DATE: July 26, 2005

TO: United States Alcohol and Tobacco Tax and Trade Bureau
Chief, Regulations and Procedures Division
Attn: Notice No. 41, P.O. Box 14412
Washington, DC 20044-4412

FROM: Chairman, Ventura County Alcohol and Drug Advisory Committee
300 North Hillmont Avenue
Ventura, CA 93003

**SUBJECT: LABELING OF ALCOHOLIC BEVERAGES UNDER THE
PROPOSED "SERVING FACTS" LABEL**

The Ventura County Alcohol and Drug Advisory Board supports a "Serving Facts" labeling requirement, which clearly details alcohol content by volume, by serving portion, and by calorie content per gram/ounce.

The Ventura County Board of Supervisors appoints the Alcohol and Drug Advisory Board members to serve in an advisory capacity to the Board of Supervisors and the Behavioral Health Director on policies and goals of the County Department of Alcohol and Drug Programs.

At its regular monthly meeting held on July 25, 2005, the Advisory Board members agreed to send this letter to your office expressing our strong position for a mandated "Serving Facts" label on all alcohol beverages. We believe such a label should be mandatory on all wines, malt beverages, and distilled alcohol beverages, and eventually on imported alcohol beverages under existing international agreements.

Members of the our Board are aware of the Notice No. 41 document, its historical background on how the current "labeling" was arrived at and the efforts by public interest organizations and individuals to better inform the public about ingredients and the alcohol content by volume and serving portions.

We believe that current labels do not give the general public and the consuming public adequate information about alcohol content, calorie content, serving size alcohol content and the amount of time necessary for alcohol in persons of different weight and water content to exit the blood stream. For example on a recent super market shelf section survey, only two malt beverages out of about 15 "beer" brands had any notice about alcohol content. All of the others had no information about the alcohol ingredient or its percentage amount per serving. Wines at least list the percent of alcohol by volume. Distilled alcohol appears to stay with the archaic approach of identifying "proof" which one needs to know must be divided by 2 to arrive at the percent of alcohol by volume.

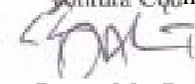
In closing, the Ventura County Alcohol and Drug Advisory Board wishes to go on record in support of a mandatory labeling requirement using the proposed "Serving Facts" format. We especially support the following:

- Alcohol percent by volume
- Alcohol content calories compared to the total calories in the "package"
- Alcohol content by serving size listing ounces, calories and volume
- A clear statement that "alcohol is processed by the body's liver at about 1/2 ounce of alcohol per hour".

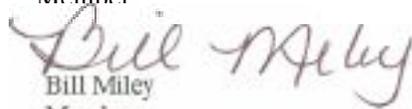
Thank you for the opportunity to provide our comments and reformations. Should you have any questions or require questions or require additional information, please contact me at (805) 652-6737



Jerry M. Harris, Chair
Ventura County Alcohol and Drug Advisory Board



Bryan MacDonald Vice - chair
Member



Bill Miley
Member

Lee Fitzgerald
Member

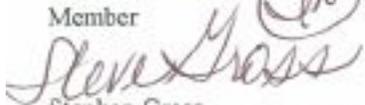


Reyna O'Neil
Member

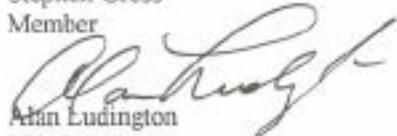
Jeanne Rothman
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Mark Lunn
Member



Stephen Gross
Member

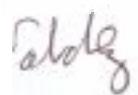


Alan Ludington
Member

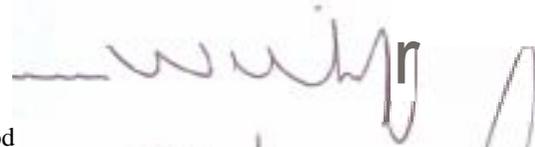
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