

**TTB Proposal for
“Serving Facts” Labeling of Wines, Distilled Spirits, and Malt
Beverages
Notice No. 73**

Suggested Talking Points for Comments due January 27, 2008

- **Express support for improved labeling of alcoholic beverages and certain elements of TTB’s proposal:**
 1. Mandatory alcohol-content disclosure is important to consumers and can help them measure and moderate their drinking.
 2. A uniform, standardized informational panel will provide consumers with product details that are useful, easy to find, and helpful in comparing the qualities of different alcoholic beverages.
 3. Listing calorie content, serving size and servings per container is critical information that will help consumers; however, disclosure of fat and protein content, which rarely occur in alcoholic beverages, may confuse consumers and suggest that those beverages are acceptable sources of those nutrients. Disclosures of fat and protein content should be subject to threshold amounts, determined in consultation with the Food and Drug Administration.

- **Advocate for the following refinements in TTB’s labeling proposal:**
 1. Insist that the mandated alcohol-content disclosure be part of the proposed “serving facts” panel, rather than appear anywhere on the label. Support alcohol-content information expressed as a percentage of volume *and* in fluid ounces per serving, but reject TTB’s alternative, voluntary label configuration. All informational panels should express alcohol content in the same way. More research should be conducted to determine the best form and content of labels to inform consumers about alcohol content, so they can measure and moderate their drinking. For example, research can help determine whether alcohol content should be disclosed in fluid ounces or in grams, to insure consistency with other disclosures on the informational panel and nutrition panels found on most foods.
 2. Alcohol labels should contain an abbreviated statement of moderate or low-risk drinking, based on the U.S. Dietary Guidelines’ suggested “two drinks per day for men and one drink per day for women (two drinks = 1 ounce of alcohol).” Potential statements include: “Healthy men should drink no more than 2 drinks (1 ounce of alcohol) per day and women no

more than 1 drink (1/2 ounce of alcohol) per day.” Or, for a 12-ounce serving of beverage that contains 0.5 fluid ounces of alcohol, “Each 12-ounce serving contains the daily healthy alcohol limit for women and half the daily alcohol limit for men.” (this would be adjusted according to the alcohol content) Or, “Each serving contains 100% (or whatever it is...) of daily healthy alcohol intake for men/women.” TTB should conduct consumer research, including focus groups, to determine the most easily understandable and acceptable messages.

TTB’s rejection of proposals to provide a moderate drinking definition (because it would supposedly encourage drinking among consumers who shouldn’t be drinking at all) is supported by no evidence whatsoever. More research on the issue is necessary, particularly on how best to convey the connection of “drinks” (alcohol content) and “servings.”

3. Generally, TTB should base reference amounts for serving size and number of servings per container on the amount of the alcoholic beverage customarily consumed as a single serving. For most products, using reference amounts that mirror the U.S. Dietary Guidelines definitions of “standard” drinks, would work. However, we believe more research is necessary to better assign real-world reference amounts to beverage containers that do not conform to TTB’s proposed reference-amount definitions.
4. In particular, TTB must ascertain realistic reference amounts for “single-serve” product containers that are common in the marketplace, but do not conform to its proposals. For example, amounts of malt beverage of 16 ounces or more are frequently packaged, sold, and consumed as a single serving. Such containers should be considered one serving, but should reflect their higher alcohol content (in fluid ounces) and higher levels of calories and other nutrients. Consumers could then compare their *alcohol* consumption with the *alcohol* amounts contained in the Dietary Guidelines definition of moderate drinking. Numerous other products come pre-packaged and marketed in “single-serve” sizes that vary from TTB’s assigned reference amounts, and they should be treated similarly. To assist consumers in using this information to measure and moderate their alcohol consumption, the label must disclose alcohol content in fluid ounces (or grams) and include the Dietary Guidelines’ definition of moderate drinking. Augmenting that definition with information on alcohol content (expressed in fluid ounces or grams) that compares “per drink” alcohol with “per serving” alcohol content would help consumers “count” their drinks.

5. Subject to necessary consumer research, TTB should separate, and highlight, the disclosure of calorie content from other nutritional information on the “serving facts” label. Given today’s substantial societal concern about excessive weight and obesity, calorie information is of vital importance and of vital interest to consumers. Consumers are far more interested in calorie content than in other nutritional information; in contrast, the proposed labeling of fat and protein, which rarely occur in alcoholic beverages, is essentially meaningless and may even confuse consumers.
6. More research is necessary, particularly to examine TTB’s assumptions and its evidence-free conclusions on several substantive issues. Further research would also be helpful to determine the most effective form of a “serving facts” (or “alcohol facts”) label, which we believe should be uniform for all beverages. Additionally, before approving an alternative linear form of “serving facts” presentation for alcohol containers larger than 50 milliliters, TTB should conduct studies to determine how such presentation would affect consumer awareness and comprehension of the proposed new label information. TTB should pay particular attention to how best to provide information that will allow consumers to measure and moderate their alcohol consumption.

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