



March 8, 2019

Michel Doukeris, Zone President of North America  
Anheuser-Busch InBev  
One Busch Place  
St. Louis, MO 63118

Gavin Hattersley, Chief Executive Officer  
MillerCoors  
250 South Wacker Drive  
Chicago, IL 60606

Dear Mr. Doukeris and Mr. Hattersley:

As an organization that seeks to improve access to information about the calorie content and ingredients in foods and beverages, including alcoholic beverages, CSPI would like to thank Anheuser-Busch InBev and MillerCoors for spotlighting this important issue in recent weeks. Bud Light's 2019 Super Bowl ad criticizing Miller Lite for using corn syrup in its beer, followed by Miller Lite's full-page *New York Times* ad claiming that corn syrup used in the brewing process does not even end up in the final product, each recognize the fact that consumers care very deeply about what goes into our food and drink. Regardless of consumers' preferred source of fermentable sugars in their beer, this so-called "corn controversy" clearly recognizes that consumers want more information about the ingredients in alcoholic beverages.

In addition to the public's interest in improved information, there is also urgent public health need. Seventy percent of American adults are now overweight or obese,<sup>i</sup> and alcohol is a significant source of calories in the American diet, accounting for 3.8 percent of total energy consumption, just behind pizza (4.3%) and savory snacks (4.6%).<sup>ii</sup> The *Dietary Guidelines for Americans* recommend that consumers take into account the calories they get from alcohol in order to avoid excessive calorie intake, but that advice is difficult to follow if labeling of calorie content is non-existent or barely readable.<sup>iii</sup>

We are encouraged that AB-InBev and MillerCoors have signed on to the Beer Institute Brewers' Voluntary Disclosure Initiative which requires companies to agree to provide information regarding calories and alcohol by volume on all labels in the form of a Serving Facts statement consistent with federal guidelines, and to disclose ingredients on the label or secondary packaging (such as the cardboard box holding cans of beer), by 2020. We recognize Miller Lite's adoption of the Serving Facts statement as well as Bud Light's adoption of a Serving Facts panel and partial ingredient list on secondary packaging.

Yet we write to make clear that these welcome initiatives fall short of providing consumers with the information that they need. A 2003 nationally-representative poll of 550 U.S. adults, commissioned by CSPI and conducted by the Global Strategy Group, found that a vast majority of consumers want clear, consistent, and comprehensive mandatory ingredient and nutrient content information on all alcoholic beverage containers:

- 94 percent of consumers surveyed supported alcohol-content labeling;
- 91 percent supported ingredient labeling;
- 89 percent supported labeling of calorie content; and
- 84 percent supported serving size information.<sup>iv</sup>

If anything consumers want this information now more than ever. This simple and straightforward type of information (with the exception of alcohol content) is already required on the labels of virtually all other foods and beverages and is accompanied by formatting requirements that promote readability.


While some alcohol purveyors, including your two companies, are now providing some of this information voluntarily, it is still incomplete and often in a format that is difficult to notice and/or read. For example, Miller Lite fails to list ingredients on cans, and Bud Light's calorie and serving information, placed in a light blue box on a blue can, is barely discernable.

Bud Light's newly-announced commitment to include a clearly-formatted Serving Facts and ingredients label on secondary packaging is helpful, but because many consumers may see only the bottle or can and not the secondary packaging, labeling that packaging alone is insufficient. This information should be displayed on each individual container with visual contrast, sufficiently large font, and a layout that promotes readability, as the Nutrition Facts Panel on foods is required to do.

As AB-InBev and MillerCoors continue to respond to consumer demand for increased transparency in the labeling of alcoholic beverages, we urge you to clearly and expressly commit to including the following information—in addition to calories, serving size, and alcohol by volume—on all beer bottles and cans, as well as on secondary packaging, for all of your brands:

- The amount of alcohol in ounces per serving;
- The number of standard drinks per container, with “standard drink” defined as a drink containing 0.6 ounces of ethyl alcohol (e.g., approximately 12 fluid ounces for beer);
- An ingredients declaration, listing each ingredient (including food and color additives and flavors) by its common or usual name;
- Disclosure of the presence of major food allergens in accordance with requirements outlined in the Food Allergen Labeling and Consumer Protection Act of 2004; and
- Current U.S. Dietary Guidelines definitions of moderate drinking for men and women.

We recommended the following format in our 2003 petition to the Alcohol and Tobacco Tax and Trade Bureau for mandatory nutrition and ingredient labeling, which easily incorporates each of these important and informative elements:<sup>v</sup>

<b>Alcohol Facts</b>	
 Contains <b>5</b> Servings	<b>Calories per Serving:</b> 98
	Alcohol by Volume: 13% Alcohol per serving: 0.5 oz
Serving Size: 5 fl oz	
U.S. Dietary Guidelines advice on moderate drinking: no more than two drinks per day for men, one drink per day for women.	
<b>Ingredients:</b> Grapes, yeast, sulfiting agents, and sorbates.	

Consumers deserve easily accessible information about the contents of the beverages they drink, including alcohol. Thank you for considering these steps to increase transparency, meet consumer demand, and improve consumer health and wellbeing.

Sincerely,



Sarah Sorscher  
Deputy Director of Regulatory Affairs



Eva Greenthal  
Policy Associate

## Notes

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<sup>i</sup> Fryar CD, Carroll MD, and Ogden CL. Prevalence of Overweight, Obesity, and Severe Obesity Among Adults Aged 20 and Over: United States, 1960-1962 Through 2015-2016. *NCHS Health E-Stats*, September 2018.

[https://www.cdc.gov/nchs/data/hestat/obesity\\_adult\\_15\\_16/obesity\\_adult\\_15\\_16.pdf](https://www.cdc.gov/nchs/data/hestat/obesity_adult_15_16/obesity_adult_15_16.pdf)

<sup>ii</sup> U.S. DEP'T OF AGRICULTURE. Scientific Report of the 2015 Dietary Guidelines Advisory Committee. February 2015. (Table D1.12) [https://ods.od.nih.gov/pubs/2015\\_dgac\\_scientific\\_report.pdf](https://ods.od.nih.gov/pubs/2015_dgac_scientific_report.pdf).

<sup>iii</sup> U.S. DEP'T OF AGRICULTURE. Dietary Guidelines 2015-2020. Appendix 9. Alcohol.

<https://health.gov/dietaryguidelines/2015/guidelines/appendix-9/>.

<sup>iv</sup> Center for Science in the Public Interest. Petition to Improve Mandatory Label Information on Alcoholic Beverages. Appendix D. December 16, 2003.

<https://cspinet.org/sites/default/files/attachment/031216IngLabelingPetition.pdf>

<sup>v</sup> Center for Science in the Public Interest. "Alcohol Facts" Label Proposed for Beer, Wine, and Liquor. December 16, 2003. <https://cspinet.org/new/200312161.html>