

August 15, 2025
Regulations and Ruling Division
Alcohol and Tobacco Tax and Trade Bureau
1310 G Street NW, Box 12
Washington, DC 20005

Comment on Proposed Rule: Alcohol Facts Statements in the Labeling of Wines, Distilled Spirits, and Malt Beverages (Docket No. TTB-2025-0002)

The undersigned organizations call on the Alcohol and Tobacco Tax and Trade Bureau (TTB) to finalize the proposed rule mandating on-package labeling of alcohol content and nutritional information. These rules will be a step forward, as current alcohol labels do not provide the information that consumers need to make informed purchasing and consumption decisions.

The “Alcohol Facts” panel set forth by the proposed rule includes “alcohol content expressed both as a percentage of alcohol by volume and in fluid ounces of pure ethyl alcohol per serving, the number of calories, and the number, in grams, of carbohydrates, fat, and protein, per serving.”¹

While this information represents a major step forward, the rule could be strengthened by additionally requiring sugars in grams, added sugars in grams, saturated fat in grams, sodium in milligrams, percent Daily Value for each nutrient based on a 2,000-calorie diet, number of standard drinks per container, the conversion between standard drinks and fluid ounces of pure ethyl alcohol, and the 2020-2025 Dietary Guidelines for Americans moderate drinking advice. The final rule should also make dual-column labeling mandatory.

This additional information is important as part of a commonsense approach to promoting transparency, health, and safety for those who consume alcohol. Excess alcohol consumption is associated with various harms including motor vehicle accidents, liver disease, cardiovascular disease, and certain cancers.² Alcoholic beverages may also contribute to other forms of diet-related chronic disease as alcohol is calorie-dense and on average accounts for 9% of daily calories for those who drink.³ Many alcoholic beverages also contain carbohydrates, added sugars, and other nutrients to limit. Alcohol content labeling is a straightforward approach that increases consumer awareness of the contents of alcoholic beverages through greater transparency.⁴

Consumers desire this information and would use it to make decisions about alcohol consumption and purchasing. In a March 2024 poll of 1,509 adults who drink alcohol (commissioned by CSPI and conducted by Big Village), strong majorities (78-90%) said alcohol content, calorie content, and nutritional content, would be at least somewhat important for their alcohol purchasing decisions.⁵

We agree with the requirement in the proposed rule that the “Alcohol Facts” disclosure appear on-package and never solely via electronic means (e.g., a QR code leading to a webpage), as this would specifically disadvantage populations that are less able to utilize smart phones or similar technology (including those who are older or living rurally).

We urge TTB to prioritize transparency and health and finalize the proposed Alcohol Facts rule to ensure that Americans can make more informed decisions about what and how much to drink. To ensure timely consumer access to this important information, the final rule should adopt a shorter compliance period of 3.5 years instead of the 5-year period proposed.

Sincerely,

Alcohol Justice
American Society for Nutrition
Association of State Public Health Nutritionists
Celiac Disease Foundation
Center for Science in the Public Interest
Consumer Federation of America
Consumer Reports
CURED
FARE (Food Allergy Research & Education)
Food Equality Initiative
Interfaith Public Health Network
National Consumers League
Project Extra Mile
Recover Alaska
The FPIES Foundation
U.S. Alcohol Policy Alliance
Winooski Partnership for Prevention

Individuals:

Sarah Ermer, MPH, CHES
Prevention Specialist
Tillamook Family Counsel

Thomas K. Greenfield
Senior Scientist
Alcohol Research Group

Marissa Hall
Assistant Professor
University of North Carolina

Kaela Plank
Health Program Planner
San Francisco Department of Public Health

Lisa R. Young, PhD, RDN
Adjunct Professor of Nutrition
New York University

References

¹ 90 Fed. Reg. 6654. Alcohol Facts Statements in the Labeling of Wines, Distilled Spirits, and Malt Beverages.

² World Health Organization. *Global Status Report on Alcohol and Health.*; 2018. Accessed March 22, 2024. <https://iris.who.int/bitstream/handle/10665/274603/9789241565639-eng.pdf?sequence=1>

³ Dietary Guidelines Advisory Committee. *Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Agriculture and the Secretary of Health and Human Services. Part D. Chapter 11: Alcoholic Beverages.* U.S. Department of Agriculture, Agricultural Research Service; 2020. Accessed March 6, 2024. https://www.dietaryguidelines.gov/sites/default/files/2020-07/PartD_Ch11_AlcoholicBev_first-print.pdf

⁴ Wettlaufer A. Can a Label Help me Drink in Moderation? A Review of the Evidence on Standard Drink Labelling. *Subst Use Misuse.* 2018;53(4):585-595. doi:10.1080/10826084.2017.1349798

⁵ Big Village's CARAVAN U.S. Online Omnibus Survey, administered March 15-20, 2024.