

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: Major Food Allergen Labeling for Wines, Distilled Spirits, and Malt Beverages (Docket No. TTB-2025-0003)

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

We commend TTB for issuing a proposed rule that would greatly improve transparency and protect consumers with food allergies by requiring labeling of the Top 9 major food allergens without exemption for processing aids. The rule could be strengthened by specifying where the allergen disclosure should appear, outlining specific formatting requirements, and requiring species specific disclosure for the labeling of finfish.

Major allergen labeling on alcohol is important because roughly 11% of U.S. adults have food allergies¹ and many alcoholic beverages contain major allergens, such as wheat in many beers, milk and nuts in liqueurs, and even fish and eggs used as processing aids in wine.² Currently, consumers with food allergies have no way of knowing if they can safely consume alcoholic beverages because neither ingredient lists, nor major allergen labeling are required.

Consumers desire this information and would use it when making purchasing decisions. In a March 2024 poll of 1,509 adults who drink alcohol (commissioned by CSPI and conducted by Big Village), strong majorities of consumers said that allergen information (79%) and ingredients (88%) would be at least somewhat important for deciding whether to purchase a particular alcoholic beverage.³

TTB should make clear in the final rule that this vital safety information should never be provided solely via QR code, 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).

Separately, TTB should publish a rule mandating full ingredients labeling on-package for all alcoholic beverages. This would further improve transparency on alcoholic products and provide additional protection for consumers with allergies to foods outside the Top 9 major food allergens.

Alcohol should no longer be exempt from the basic labeling of allergens that consumers with allergies can rely upon for nearly all other foods and beverages. 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.

We urge TTB to prioritize transparency by not only finalizing the proposed Major Food Allergen Labeling rule, but also by proposing a rule to mandate ingredients labeling on alcohol to ensure that Americans with food allergies can identify other ingredients that trigger allergy beyond the major food allergens.

Sincerely,

Alcohol Justice
Allergy and Asthma Network
Alpha-gal Alliance Action Fund
American Society for Nutrition
Association of State Public Health Nutritionists
Asthma and Allergy Foundation of America
Celiac Disease Foundation
Center for Science in the Public Interest
Consumer Federation of America
Consumer Reports
CURED Nfp
Eliza-Alavi Foundation
FARE (Food Allergy Research & Education)
Food Allergy & Anaphylaxis Connection Team (FAACT)
Food Equality Initiative
Interfaith Public Health Network
National Consumers League
Project Extra Mile
The FPIES Foundation
U.S. Alcohol Policy Alliance

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References

¹ Gupta RS, Warren CM, Smith BM, et al. Prevalence and Severity of Food Allergies Among US Adults. *JAMA Netw Open*. 2019;2(1):e185630. doi:[10.1001/jamanetworkopen.2018.5630](https://doi.org/10.1001/jamanetworkopen.2018.5630)

² Allergy and Anaphylaxis Australia. *Food Allergy and Alcohol*. August 13, 2024. Accessed March 12, 2025. <https://allergyfacts.org.au/food-allergy-and-alcohol/>

³ Big Village's CARAVAN U.S. Online Omnibus Survey, administered March 15-20, 2024.