

UNIVERSITY OF CALIFORNIA, DAVIS

BERKELEY • DAVIS • IRVINE • LOS ANGELES • RIVERSIDE • SAN DIEGO • SAN FRANCISCO



SANTA BARBARA • SANTA CRUZ

COLLEGE OF AGRICULTURAL AND ENVIRONMENTAL SCIENCES
AGRICULTURAL EXPERIMENT STATION
COOPERATIVE EXTENSION
DEPARTMENT OF NUTRITION
TELEPHONE (530) 752-4643
FAX (530) 752-8966

ONE SHIELDS AVENUE
DAVIS, CALIFORNIA 95616-8669

September 16, 2005

Chief, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
Attn: Notice No. 41
P.O. Box 14412
Washington, DC 20044-4412
FAX 202-927-8525

Re: Notice No. 41

To Whom It May Concern:

As a nation, we are experiencing an epidemic of overweight and obesity. Today, more than 44 million Americans are now classified as obese, a jump of 74 percent since 1991.

To address this challenge requires providing the public with the tools to make more informed consumption decisions, including labeling information about the alcohol and calorie content on all beverage alcohol products, the only major category of consumable products that don't provide ingredient and content labeling. For this reason, I strongly urge the Alcohol and Tobacco Tax and Trade Bureau's (TTB) to make mandatory labeling of all beer, wine and distilled spirits a top priority.

Alcohol is a significant source of calories. As a recent FDA report makes clear, there is a growing recognition that counting calories and balancing energy consumed against energy expended is the key to maintaining a healthy weight. Moreover, the *2005 Dietary Guidelines for Americans* specifically addresses the beneficial and harmful effects of alcohol consumption, depending on the amount consumed and defines moderate drinking as no more than 2 drinks per day for men and one drink per day for women. Through standardized labeling on alcoholic beverages, it will be possible to relay this information at the point of purchase, where it can have an impact in guiding informed decision-making.

As a nutrition researcher and educator, I believe the public will benefit from having access to all relevant information that will improve the ability of consumers to make healthy and informed purchasing and consumption decisions. Of key importance is providing consumers with the following information in a standardized format:

- The amount of alcohol (in fl oz) per serving);
- The percentage alcohol by volume
- The serving size (*i.e.*, 12 fluid ounces (fl oz) for beer, 5 fl oz for wine, and 1.5 fl oz for distilled spirits);
- The number of calories per serving;
- The number of standard drinks per container; and
- The definition of a standard drink

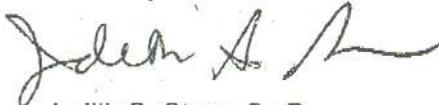
Stern, Judith S.
September 16, 2005
page 2

In addition, consumers would benefit from a statement on the label that summarizes the *Dietary Guidelines for Americans 2005* advice on moderate drinking. Also, all alcoholic beverages should be required to list their ingredients in laymans language and to identify any major food allergens present in the product. Since alcohol beverages can contain major food allergens, such as milk and eggs, identification of major food allergens is necessary to ensure that consumers with food allergies have the information they need to avoid those allergens.

Recognizing that TTB will need significant time to implement a final rule making, I would also urge the agency to allow manufacturers to include labeling information now on a voluntary basis that provides alcohol, calorie, and allergen information. For the more than 55 percent of American adults who consume alcohol, this information is sorely lacking and should be made available as quickly as possible.

Thank you for your consideration.

Sincerely,



Judith S. Stern, Sc.D.
Distinguished Professor of Nutrition and Internal Medicine
(530) 752-6575 Office
(530) 752-1297 FAX
jsstem@ucdavis.edu