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# A Call for Action: Alcoholic Beverage Labeling

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*Public Health and Nutrition  
Organizations, Consumer  
Advocates, and Leading Public  
Health Officials Unite Around  
the Need For a Useful Final  
Regulation on Alcohol  
Beverage Labeling*

*April 22, 2008*

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As we mark Alcohol Awareness Month, we wish to draw attention to the fact that there is an important tool to inform and educate consumers about what's in a serving of an alcoholic beverage that is largely unused – the alcohol beverage label.

Today, consumers have access to labeling information about the composition and nutrition of everything they eat, drink or swallow with one notable exception -- alcoholic beverages. Accordingly, a wide range of stakeholders – consumer advocacy organizations, public health and nutrition groups, medical societies, and academic leaders – are on record advocating that the federal government require standardized labeling information on all beer, wine and distilled spirits products. Here are the reasons why.

## Public Health Justification for Better Alcohol Labeling

### .... The Problem

Over-consumption of alcohol is a serious public health problem:

- Binge drinking

According to the Harvard School of Public Health, nearly one-quarter of college students engage in binge drinking. Although deaths from acute alcohol intoxication make the headlines, they are just the tip of the iceberg. There are approximately 1,100 alcohol-related motor vehicle crash deaths and 300 alcohol-related fatal injuries among college students in the US each year.

- Drunk Driving

In 2006, an estimated 17,602 people died in alcohol-related traffic accidents, 41% of total traffic fatalities.

- Obesity

Not only is alcohol a significant source of calories, but excessive alcohol consumption

also makes it difficult to ingest sufficient nutrients within an individual's daily caloric allotment and to maintain a healthy weight.

- Alcohol Abuse

Excessive consumption of alcohol increases the risk of liver cirrhosis, hypertension, cancers of the upper gastrointestinal tract, and serious injury caused by cognitive impairment.

- Underage drinking

The incidence of current alcohol use among youths aged 12-17 was 16.6% in 2006. Children who begin drinking before age 15 are 5 times more likely to develop alcohol problems than those who start after age 21.

### .... Part of the Solution

To reduce these health risks requires useful and easily accessible information about the alcohol and calorie content of all beverage alcohol products, so that consumers can make responsible drinking decisions.

Currently, alcohol beverage labels do not provide the information consumers need to make responsible drinking decisions.

For example, government recommendations on alcohol consumption are phrased in terms of number of drinks. The *Dietary Guidelines for Americans* defines moderate drinking for adults as no more than one drink per day for women, two for men. Yet, most Americans do not know how the government defines a “drink,” and there is nothing on alcoholic beverage labels to inform them or tell them how many drinks are in the labeled product.

The same is true for calories. At a time when obesity is an increased public health threat, the *Dietary Guidelines for Americans* recommends “reduc[ing] one’s intake of added sugars, fats, and alcohol, which all provide calories but few or no essential nutrients.” Yet, when it comes to counting calories, alcoholic beverages are a huge blind spot in the American diet, since

most alcohol labels do not list calories.

If we really want to reign in unhealthy drinking practices, a logical starting point would be to require that all alcoholic beverage labels provide the information consumers need to drink responsibly and follow government dietary recommendations.

## **Background**

In 1972, the Center for Science in the Public Interest (CSPI), a consumer advocacy organization, petitioned the Bureau of Alcohol, Tobacco, and Firearms, to require meaningful labeling of alcoholic beverages. As a belated response, ATF issued a very weak rule in 1980 but then rescinded it in 1981. This led to a court challenge, after which ATF decided to reexamine its stance on ingredient labeling. In 1983, ATF went on record as rejecting alcohol labeling because, in the agency’s view, “there was no overwhelming desire on the part of consumers for comprehensive ingredient labeling.”

Skip ahead 20 years, and the battle resumes. In 2003, the National Consumers League and CSPI, together with 75 other organizations, petitioned ATF's successor agency -- the Alcohol and Tobacco Tax and Trade Bureau or TTB -- to require an easy-to-read, standardized "Alcohol Facts" label, similar to the popular "Nutrition Facts" labels on foods and nonalcoholic beverages.

This time, TTB's response was to issue draft specifications for a "Serving Facts" panel that would contain extensive label information, including the amount of alcohol per serving. Then, under intense pressure from certain segments of the industry, TTB backed down again, deciding that any label changes must be done through a rulemaking process.

Two more years went by and then in 2005, TTB issued a request for public comments and received over 18,000 letters. *According* to a review by Shape Up America!, a nonprofit group that encourages a better diet and lifestyle, 96% of all comments received by TTB supported a

standardized label with the number of calories and the amount of alcohol per serving as well as standard drink information.

Most recently, in 2007, TTB published a proposed rule on improved labeling of alcoholic beverages, stating: "It is now appropriate" to consider amending the regulations because "of increased interest in including nutrition and ingredient information on alcohol beverage labels."

But TTB's proposal left out the most important information consumers need when consuming an alcoholic beverage -- the amount of alcohol in a serving. This omission resulted in another barrage of letters from consumers and public health leaders, all calling for complete information on the label.

### **The Information Consumers Need – The Alcohol Facts or Serving Facts Panel**

Regardless of whether it is called an Alcohol Facts or a Serving Facts panel, the labels on alcoholic beverages must

meet a public health need – providing the basic information the 55% of adult Americans that consume beverage alcohol need to follow the *Dietary Guidelines*' advice and drink responsibly. This should include the following:

- Serving size;
- Amount of alcohol per serving;
- Percent alcohol by volume;
- Definition of a “standard drink” and the number of standard drinks per container;
- Advice on alcohol consumption in the current edition of the *Dietary Guidelines for Americans*;
- Number of calories per serving;
- Amount of fat, protein, and carbohydrates per serving; and
- An ingredients declaration listing each ingredient by its common or usual name and identifying any major food allergens present in the product.

## Why This Alcohol Information is Essential

The *Dietary Guidelines for Americans* 2005, published by the U. S. Department of Agriculture and the Department of Health and Human Services, summarizes the current science on nutrition and serves as the blueprint for all federal nutrition policy. According to the *Dietary Guidelines*, alcoholic beverages can have beneficial effects when consumed in moderation, but can contribute to dependency, obesity, and a wide range of diseases if consumed in excess.

The *Dietary Guidelines* advice on alcohol consumption is couched in terms of standard “drinks”:

Those who choose to drink alcoholic beverages should do so sensibly and in moderation – defined as the consumption of up to one drink per day for women and up to two drinks per day for men... Twelve fluid ounces of regular beer, 5 fluid ounces of wine, or 1.5 fluid

ounces of 80-proof distilled spirits count as one drink for purposes of explaining moderation.

As the scientific basis for this recommendation, the *Dietary Guidelines* cite evidence indicating that the “lowest all-cause mortality” and the “lowest coronary heart disease mortality” occur at an intake of one to two drinks a day, while heavy drinking increases the risk of many serious diseases and is the third leading cause of mortality in the United States.

Obviously, consumers cannot follow this advice if they don’t know what a “drink” is. Fortunately, the *Dietary Guidelines* define a “drink” as 12 fluid ounces (fl oz) of regular beer, 5 fl oz of wine, and 1.5 fl oz of 80-proof distilled spirits. This is the amount of each beverage that contains 0.6 fl oz or 14 grams of pure alcohol. This definition has been used by the *Dietary Guidelines* for years without controversy.

Unfortunately, many consumers don’t know the definition of a “drink.” Even if they did, there’s not enough information on

beer, wine, and spirits labels for consumers to calculate the number of “drinks” they are consuming.

### “Standard Drink” Information

The definition of a standard drink is not only relied on by the *Dietary Guidelines*. Virtually all government educational materials and warnings regarding alcohol consumption are phrased in terms of “standard drinks.” Consider these facts:

- FDA Drug Warning

The alcohol warning that FDA requires on labels of over-the-counter painkillers and fever reducing drug products uses “standard drinks.” The required warning for acetaminophen, for example, reads:

**Alcohol Warning:** If you consume 3 or more alcoholic drinks every day, ask your health professional whether you should take acetaminophen or other pain relievers/fever reducers.

Acetaminophen may cause liver damage.

The “drinks” referred to in the FDA warning are “standard drinks.” Many over-the-counter drugs carry this warning on their labels.

- State Drivers License Manuals

A large majority of State drivers license manuals use “standard drinks” to explain responsible drinking.

- Health Messages

Many other government agencies and public health organizations use the “standard drink” concept in their messages, including:

American Dietetic Association

American Heart Association

American Medical Association

Centers for Disease Control and Prevention

Mothers Against Drunk Driving

National Council on Alcoholism and Drug Dependence

National Highway Traffic Safety Administration

National Institutes of Health/National Institute on Alcohol Abuse and Alcoholism

U. S. Department of Education

U. S. Surgeon General

TTB has also utilized “standard drinks” (in the statement of average analysis required on alcoholic beverages that make calorie or carbohydrate claims), but now TTB appears to be backing away from it. The agency that regulates labeling and advertising of alcoholic beverages, and therefore controls the best avenue for educating consumers, has unilaterally decided to abandon the definition of a “drink” used in the *Dietary Guidelines*, FDA warnings, and other alcohol educational materials. The resulting situation is unacceptable -- federal agencies working at cross purposes on a vital public health issue.

**Amount of Alcohol per Serving:  
Alcohol in beer is the same as  
alcohol in wine and distilled  
spirits**

It is equally important that alcohol beverage labels list the amount of alcohol, in fluid ounces or grams, per serving.

While the *Dietary Guidelines* and other government advice is stated in terms of number of “drinks,” some consumers will undoubtedly prefer to measure their alcohol consumption in terms of the amount of pure alcohol. They should have this option.

Even TTB concedes that providing the amount of alcohol per serving would enable consumers “to compare the quantity of alcohol contained in single servings of different [products] without doing mathematical calculations.” But, unfortunately, this information would not be required on the Serving Facts panel.

**Giving Consumers Information  
That They Want and Can Use**

There is overwhelming public support for alcohol beverage label reform. As noted above, 96% of the public comments to TTB favor more informative labeling.

As further validation, in 2005, the National Consumers League commissioned Opinion Research Corporation to conduct a national random sample survey of consumer views on alcohol labeling. The survey findings provided further evidence of overwhelming support for major changes in TTB policy.

Of the nearly 1,000 adults polled, nine in ten said companies should be allowed to put information on their labels that will state how much alcohol is in a standard serving. The survey also confirmed its support for mandatory ingredient labeling, including information about ingredients that may cause an allergic reaction.

Of key importance, the majority of survey respondents said that, in addition to ingredients, they wanted to know the serving

size, the number of calories per serving, the number of servings per container, the amount of alcohol per serving, and the amount of carbohydrates, fat and protein per serving.

To confirm public perceptions about labeling, in December 2007 Shape Up America! commissioned a national random sample survey, conducted by Penn, Shoen & Berland Associates. When presented with three alternative labels, three out of four chose the label that included the notation "a standard drink contains 0.6 fluid ounces of alcohol." This confirmed that Americans want detailed and complete information. In addition, nearly four in five respondents agreed that "There is no point in having labeling on the containers of alcohol beverages unless labels include all nutrition and ingredient information, including the amount of alcohol in each drink."

When read a list of types of information that could be included on an alcoholic beverage label, the largest percentage (92%) of

respondents said "the amount of alcohol in each drink" would be important, and 84% said that the number of calories in each drink was important. Many (77%) also wanted labels to include the *Dietary Guidelines* recommendation on alcohol.

The Federal Trade Commission has submitted detailed comments to the TTB, telling the agency that mandatory labeling of beverage alcohol products "is likely to have beneficial effects on consumers and competition."

According to the FTC, the disclosure of alcohol and nutrient content information on the labels of beer, wine, and distilled spirits would "increase the ability of consumers to evaluate their actual alcohol, calorie, carbohydrate, and fat intake."

### **The Bottom Line: Alcohol Awareness Should Start on the Label**

All the facts boil down to this: more than 30 years have gone by and the American public still does not have access to a

standardized and complete label about the alcohol and calorie content per serving information for beer, wine and distilled spirits. It is time for TTB to do the right thing and mandate a standardized Alcohol or Serving Facts label with information about the amount of alcohol per serving, the definition of a standard drink, the number of standard drinks per container, the *Dietary Guidelines* advice on moderate drinking, the number of calories per serving, and ingredient information. We have created model Serving Facts labels for beer, wine, and spirits to show what they would look like (see next page).

In the next revision of the *Dietary Guidelines*, coming in 2010, USDA and HHS can also help educate consumers by also including the fact that a

“standard drink” is the amount of a beverage that contains 0.6 fl oz of pure alcohol.

Now is when action by TTB can make an important difference.

## MODEL SERVING FACTS LABELS



**A&Z  
SPIRITS**

Produced and bottled by A&Z Spirits Co.,  
especially for you in Your Town, USA.

Serving Facts	
Serving Size 1.5 fl oz (44 mL)	
Servings Per Container 17	
Amount Per Serving	
Calories	97
Fat	0g
Carbohydrates	0g
Protein	0g
<b>Alcohol by volume</b>	<b>40%</b>
Fl oz. of alc.	*0.6
*A Standard Drink contains 0.6 fluid ounces of alcohol	
<b>U.S. Heavy Drinking Guideline:</b> If you drink, no more than two drinks per day for men, one drink per day for women.	



Always Remember To  
Drink Responsibly



**Beer**

Brewed and bottled by The Beer  
especially for you in Your Town, USA.

Serving Facts	
Serving Size 12 fl oz (355 mL)	
Servings Per Container 1	
Amount Per Serving	
Calories	163
Fat	0g
Carbohydrates	13g
Protein	1g
<b>Alcohol by volume</b>	<b>5%</b>
Fl oz. of alc.	*0.6
*A Standard Drink contains 0.6 fluid ounces of alcohol	
<b>U.S. Heavy Drinking Guideline:</b> If you drink, no more than two drinks per day for men, one drink per day for women.	



Always Remember To  
Drink Responsibly



**ESTATE WINERY**

Vinted and bottled by OT Estate Winery,  
especially for you in Your Town, USA.

Serving Facts	
Serving Size 5 fl oz (147 mL)	
Servings Per Container 6	
Amount Per Serving	
Calories	100
Fat	0g
Carbohydrates	1.2g
Protein	0.2g
<b>Alcohol by volume</b>	<b>12%</b>
Fl oz. of alc.	*0.6
*A Standard Drink contains 0.6 fluid ounces of alcohol	
<b>U.S. Heavy Drinking Guideline:</b> If you drink, no more than two drinks per day for men, one drink per day for women.	



Always Remember to  
Drink Responsibly