



April 23, 2025

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

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

To Whom it May Concern,

The American Society for Nutrition (ASN) appreciates the opportunity to comment on Alcohol Facts Statements in the Labeling of Wines, Distilled Spirits, and Malt Beverages. Founded in 1928, ASN is the nation's leading society for nutrition research and practice, representing more than 8,000 professional members across 100 countries. Our members – including nutrition scientists, physicians, dietitians, and other stakeholders – are dedicated to advancing our mission of “A Healthier World Through Evidence-Based Nutrition.” ASN supports the Alcohol and Tobacco Tax and Trade Bureau's (TTB) efforts to implement labeling of alcohol content and nutritional information on alcoholic beverages, as this will impart important information to consumers that they need to make informed health and nutrition-related purchases and decisions.

The “Alcohol Facts” panel in 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.” This information is important to promote transparency regarding the contents of alcoholic beverages, and to highlight health and safety information for those who consume alcohol. Alcohol consumption is the third leading preventable cause of cancer in the United States, after tobacco and obesity, increasing risk for at least seven types of cancer¹. Alcoholic beverages can be calorie-dense and therefore contribute to diet-related chronic diseases. On average, alcohol accounts for 9% of daily calories for those who drink.² Many alcoholic beverages also contain added sugars and other nutrients to limit.

As such, the proposed rule could be strengthened by also requiring additional nutritional content, including total sugars in grams, added sugars in grams, saturated fat in grams, sodium in milligrams, and a percent Daily Value for each of these nutrients based on a 2,000-calorie diet.

¹ [Alcohol and Cancer Risk 2025: The U.S. Surgeon General's Advisory](#). US Department of Health and Human Services, Office of the Surgeon General. January 3, 2025.

² Dietary Guidelines Advisory Committee. 2020. [Scientific Report of the 2020 Dietary Guidelines Advisory Committee](#): Advisory Report to the Secretary of Agriculture and the Secretary of Health and Human Services. U.S. Department of Agriculture, Agricultural Research Service, Washington, DC. 2440 Research Blvd, Suite 430 | Rockville, MD 20850

The final rule should also require the number of standard drinks per container (instead of the proposed number of fluid ounces of pure ethyl alcohol per serving), and the conversion between standard drinks and fluid ounces of pure ethyl alcohol. TTB may also consider dual-column labeling for certain alcoholic beverages for those that are customarily consumed in one sitting. This label has two columns, one for listing the nutritional facts related to a single serving and one listing the nutritional facts for the contents of the entire package.

ASN supports the requirement in the proposed rule that the “Alcohol Facts” disclosure appear on alcoholic beverage packages and never solely via electronic means (e.g., a QR code leading to a webpage), as this would specifically disadvantage populations that may be less likely to utilize technology to gain this important health and safety information.

ASN urges 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.

Thank you in advance for your consideration of the American Society for Nutrition’s comments on Alcohol Facts Statements in the Labeling of Wines, Distilled Spirits, and Malt Beverages. Please contact Sarah Ohlhorst, MS, RD, ASN’s Chief Science Policy Officer (sohlhorst@nutrition.org; 240-428-3647) for more information.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Courtney", with a horizontal line extending to the right from the end of the signature.

John E. Courtney, PhD
Chief Executive Officer