



April 25, 2025

Howard Lutnick
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

RE: U.S. Trade Representative's opposition to Ireland's Public Health (Alcohol) Bill and related labeling regulations

Dear Secretary Lutnick:

The undersigned consumer and public health organizations write to express strong support for Ireland's Public Health (Alcohol) Bill and implementing regulations, and to dispute the characterization of this labeling requirements as an unlawful foreign trade barrier, as indicated in the recently issued 2025 National Trade Estimate Report on Foreign Trade Barriers.¹ The new labeling requirements, which will include a cancer warning on alcoholic beverages sold in Ireland starting in May of 2026, have cleared extensive procedural hurdles, including those raised by the U.S. Trade Representative (USTR) on behalf of the alcohol industry in 2023. Resurrecting these specious attacks on scientifically sound, popularly supported public policy undermines USTR's credibility, and threatens to undercut the Trump Administration's "Make America Healthy Again" objectives.²

For too long, consumers in the United States have not had the benefit of an updated health warning statement on alcoholic beverages, nor of the most basic information describing the content of alcoholic beverages. In 2003, many of our groups petitioned federal regulators to require information on alcohol labels, including the amount of alcohol in fluid ounces per suggested serving, the number of calories, and ingredients.³ More recently, several of this letter's signatories petitioned federal regulators to act pursuant to the Alcoholic Beverage Labeling Act of 1988 (ABLA) and to recommend that Congress update the health warning statement on alcohol to include a cancer warning.⁴

Last year, federal officials took important steps towards better alcohol labeling rules. The Department of Treasury's Alcohol and Tobacco Tax and Trade Bureau (TTB) proposed requiring that alcohol

¹ *USTR Releases 2025 National Trade Estimate Report*. (2025, March 31). United States Trade Representative.

<https://ustr.gov/about/policy-offices/press-office/press-releases/2025/march/ustr-releases-2025-national-trade-estimate-report>

² *Establishing the President's Make America Healthy Again Commission*. (2025, February 13). The White House.

<https://www.whitehouse.gov/presidential-actions/2025/02/establishing-the-presidents-make-america-healthy-again-commission/>

³ See Letter from consumer advocacy and public interest groups to the Alcohol and Tobacco Tax and Trade Bureau regarding Improving Mandatory Label Information on Alcoholic Beverages, December 16, 2003.

<https://www.cspinet.org/sites/default/files/attachment/031216IngLabelingPetition.pdf>

⁴ See Petition for a Report to Congress Supporting a Label on Alcoholic Beverages Warning the Public that Consumption Can Cause Cancer, Including Breast and Colon Cancers submitted by consumer and health advocacy groups, October 21, 2020.

<https://consumerfed.org/testimonial/consumer-public-health-groups-petition-for-cancer-warning-on-alcohol/>



labels disclose all major food allergens used in production, along with per-serving alcohol, calorie, and nutrient content information in an “Alcohol Facts” statement.⁵ The U.S. Surgeon General issued an advisory recommending that Congress update the ABLA to include a cancer warning.⁶ As a keystone MAHA strategy, the Trump Administration should work to finalize the proposed TTB rules, and propose rules to require ingredients labeling on alcohol similar to every other food and beverage product sold in the country, and it should work with Congress to update the ABLA with a cancer warning. These requirements are consistent with the MAHA Commission’s mandate to address the United States’ dwindling life expectancy—significantly weighed down by alcohol attributable deaths⁷—and they are consistent with Ireland’s alcohol labeling law.

Under the Ireland law, alcohol labels will have to state calorie content and grams of alcohol per serving and per container, along with warnings about the risk of consuming alcohol when pregnant,⁸ and the risk of liver disease and fatal cancers from alcohol consumption. According to a representative survey, 81.9% of Irish adults support the warning labels.⁹ Thanks in part to alcohol industry opposition, the law is not set to go into effect until May of 2026, nearly a decade after the Irish parliament passed it in 2018.¹⁰

The USTR collaborated in that opposition in 2023, parroting alcohol industry talking points that Ireland finalized its labeling regulations too soon after closing the comment period on the rules. As the 2024 National Trade Estimate Report on Foreign Trade Barriers explained, these procedural objections were rewarded with concessions from Ireland “extending the transition period” for compliance with the rule and “permitting importers to affix stickers with the required information to imported products.”¹¹

USTR should drop any further opposition to this rule. The substantive objections voiced by alcohol industry trade groups and their allies are not persuasive, as many our groups have previously explained.¹²

⁵ *All Notices of Proposed Rulemaking*. TTB: Alcohol and Tobacco Tax and Trade Bureau. <https://www.ttb.gov/laws-and-regulations/all-rulemaking>

⁶ *Alcohol and Cancer Risk*. (2024, December 19). U.S. Department of Health and Human Services. <https://www.hhs.gov/surgeongeneral/reports-and-publications/alcohol-cancer/index.html>

⁷ Orgera, K., Kezh, A., Ranney, M., & Grover, A. (2024). *Narrowing the Gap: The Burden of Alcohol, Drugs, and Firearms on U.S. Life Expectancy*. Association of American Medical Colleges Research and Action Institute. https://doi.org/10.15766/rai_r9oi8esu

⁸ Ireland is estimated to have the third highest incidence of fetal alcohol spectrum disorder (FASD) in the world. Lange S, Probst C, Gmel G, Rehm J, Burd L, Popova S. Global Prevalence of Fetal Alcohol Spectrum Disorder Among Children and Youth: A Systematic Review and Meta-analysis. *JAMA Pediatr*. 2017 Oct 1;171(10):948-956. doi: 10.1001/jamapediatrics.2017.1919. PMID: 28828483; PMCID: PMC5710622. (“Of 187 countries, South Africa was estimated to have the highest prevalence of FASD at 111.1 per 1000 population (95% CI, 71.1-158.4 per 1000 population), followed by Croatia at 53.3 per 1000 population (95% CI, 30.9-81.2 per 1000 population) and Ireland at 47.5 per 1000 population (95% CI, 28.0-73.6 per 1000 population).”).

⁹ Calnan, S., Millar, S. R., & Mongan, D. (2023). Support for evidence-based alcohol policy in Ireland: Results from a representative household survey. *European Journal of Public Health*, 33(2), 323–330. <https://doi.org/10.1093/eurpub/ckad031>

¹⁰ Murray, F. (2025). On-label alcohol beverage warnings in Ireland- setting a standard for Europe. *The Lancet Regional Health – Europe*, 50. <https://doi.org/10.1016/j.lanepe.2025.101209>

¹¹ USTR Releases 2024 National Trade Estimate Report on Foreign Trade Barriers. (2024, March 29). United States Trade Representative. <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2024/march/ustr-releases-2024-national-trade-estimate-report-foreign-trade-barriers>

¹² See e.g., Letter from Consumer Federation of America to EU Regulators Regarding Ireland Alcohol Labeling Law, September 22, 2022. <https://consumerfed.org/wp-content/uploads/2022/09/CFA-EC-comments.pdf>



In particular, Ireland’s proposed law will not confuse consumers because it deviates from alcohol labeling practices adopted in the United States. Rather, U.S. labeling requirements leave consumers confused, precisely because they lack the elements soon to appear on beverages for sale in Ireland. Reforms like those proposed in Ireland will significantly help to raise awareness about the risks associated with alcohol consumption, and support more informed decisions by consumers who choose to drink alcohol.

The Ireland law will particularly help to address the low levels of public awareness regarding alcohol cancer risk. The Surgeon General’s 2025 Advisory on Alcohol and Cancer Risk “highlights alcohol use as a leading preventable cause of cancer in the United States, contributing to nearly 100,000 cancer cases and about 20,000 cancer deaths each year.” The Advisory notes that “[f]or certain cancers, like breast, mouth, and throat cancers, evidence shows that this risk may start to increase around one or fewer drinks per day,” yet “less than half of U.S. adults are aware of the relationship between alcohol consumption and cancer risk.”¹³

Indeed, an abundance of survey data illustrates this lack of awareness. Responses from 10,940 U.S. women aged 15-44 years participating in the National Survey of Family Growth (NSFG) showed that 88% recognized that a family history of breast cancer increases an individual’s risk for breast cancer. But in response to the question: “Do you think that drinking alcoholic beverages increases a woman’s chances of getting breast cancer a lot, a little, or not at all or do you have no opinion?”, just 24.6% answered ‘a lot’ or ‘a little,’ with 27.4% expressing “no opinion.”¹⁴ These results are consistent with polling in Ireland, which has reportedly found that 79% of the public is not aware of the link between alcohol and breast cancer.¹⁵ Other U.S. survey data reveals unfamiliarity with alcohol’s contribution to cancer risk more broadly. The National Cancer Institute’s Health Information National Trends Survey (HINTS) has consistently found that far less than half of respondents identified alcohol as a cancer risk factor, and ten percent of respondents to the 2020 HINTS indicated (incorrectly) that drinking wine decreases the risk of getting cancer.¹⁶ Particularly disturbing, a 2015 study of 593 survivors of colorectal cancer—a cancer for which alcohol is an established risk factor¹⁷—found that “15% had never heard of recommendations to limit alcohol,” and 11 percent were only “slightly familiar” with those recommendations.¹⁸

¹³ *Alcohol and Cancer Risk*. (2024, December 19). U.S. Department of Health and Human Services. <https://www.hhs.gov/surgeongeneral/reports-and-publications/alcohol-cancer/index.html>

¹⁴ Jaya S. Khushalani, Jin Qin, Donatus U. Ekwueme, Arica White. “Awareness of breast cancer risk related to a positive family history and alcohol consumption among women aged 15–44 years in United States,” *Preventive Medicine Reports*, Vol. 17, 2020, 101029, ISSN 2211-3355, <https://doi.org/10.1016/j.pmedr.2019.101029>.

¹⁵ Alcohol label wars: Ireland’s new warning law faces fight at World Trade Organisation. (2023, June 11). *The Irish Times*. <https://www.irishtimes.com/world/europe/2023/06/11/label-wars-irelands-new-alcohol-warning-law-heads-for-fight-at-world-trade-organisation/>

¹⁶ See *All HINTS questions*. National Cancer Institute, Health Information National Trends Survey. <https://hints.cancer.gov/view-questions/all-hints-questions.aspx>

¹⁷ See *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans: Alcohol Drinking*, World Health Organization International Agency for Research on Cancer, <https://monographs.iarc.fr/wp-content/uploads/2018/06/mono44.pdf>.

¹⁸ Hawkins et al. “Awareness of Dietary and Alcohol Guidelines Among Colorectal Cancer Survivors.” *American Journal of Preventive Medicine* (2015), <https://www.sciencedirect.com/science/article/pii/S0749379715004869>



Consumers have a right to accurate information about alcohol, in part to counter the billions of dollars spent by the industry on advertising.¹⁹ As this advertising has shifted from traditional media like radio and television to the internet and social media, researchers have documented its reach to underage consumers.²⁰ This exposure to alcohol marketing increases underage drinking risk,²¹ as well as increased alcohol consumption generally and “increased binge or hazardous drinking behavior.”²² Unfortunately, no profit motive compels alcohol manufacturers or any other industry to provide unbiased information about alcohol’s health risks. That is why providing such information is a core government function. U.S. trade officials should not obstruct that function in Ireland.

Thank you for your consideration of this letter. If you have questions or would like to further discuss any of the points raised in this letter, please contact Thomas Gremillion via email: tgremillion@consumerfed.org or telephone: 202-939-1010 and we will be glad to meet with you and your colleagues.

Sincerely,

Breast Cancer Prevention Partners

Center for Science in the Public Interest

Consumer Federation of America

Project Extra Mile

Recover Alaska

Texans for Safe and Drug-Free Youth

U.S. Alcohol Policy Alliance

¹⁹ See, e.g. Jernigan. The Alcohol Marketing Landscape: Alcohol Industry Size, Structure, Strategies, and Public Health Responses. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7064002/> (noting that alcohol companies are among the largest advertisers in the world); Roni Rabin. “It Was Supposed to Be an Unbiased Study of Drinking. They Wanted to Call It ‘Cheers.’” *N.Y. Times*, June 18, 2018 (detailing “disturbing examples of coordination between scientists and the alcohol industry.”).

²⁰ Zhang, L., & Esser, M. B. (2024). U.S. Adolescents’ Exposure to Alcohol Marketing: Self-Reported Exposure on the Internet and Traditional Media. *AJPM Focus*, 3(5). <https://doi.org/10.1016/j.focus.2024.100243>

²¹ Sargent JD, Babor TF. The relationship between exposure to alcohol marketing and underage drinking is causal. *J Stud Alcohol Drugs Suppl.* 2020;Suppl19(suppl 19):113–124. <https://doi.org/10.15288/jsads.2020.s19.113>

²² Noel, J. K., Sammartino, C. J., & Rosenthal, S. R. (2020). Exposure to Digital Alcohol Marketing and Alcohol Use: A Systematic Review. *Journal of Studies on Alcohol and Drugs. Supplement, Suppl 19*, 57–67. <https://doi.org/10.15288/jsads.2020.s19.57>