

August 15, 2025

Mary G. Ryan

Administrator

Alcohol and Tobacco Tax and Trade Bureau (TTB)

U.S. Department of Treasury

Comment on Proposed Rules re Alcohol Facts Statements, Major Food Allergens in the Labeling of Wines, Distilled Spirits, and Malt Beverages (Dockets No. TTB-2025-0002; TTB-2025-0003)

*VIA ONLINE SUBMISSION*

Dear Administrator Ryan:

Consumer Federation of America appreciates the opportunity to comment on this important rulemaking. As noted in our joint comments with the Center for Science in the Public Interest (CSPI) and other public health and consumer advocates, we strongly support the Alcohol and Tobacco Tax and Trade Bureau’s (TTB’s) proposed rules to mandate Alcohol Facts panels and Major Food Allergen disclosures on wines, spirits, and malt beverages, and encourage TTB to strengthen the rule by requiring disclosure elements such as added sugars in grams, saturated fat in grams, and sodium in milligrams, within the “Alcohol Facts” panel, and by further specifying the format and location of allergen disclosures on labels. We write separately here to underscore how this rulemaking advances the Administration’s stated “Make America Healthy Again” objectives, and to urge you to follow through with ingredients labeling requirements that will give consumers the basic information on alcoholic beverage labels that they have come to expect when buying all other beverages and food.

Leading wellness influencers have called attention to the lack of transparency in alcohol labeling. The “Food Babe” Vani Hari has pointed out that “the government agency that regulates alcoholic drinks does not require alcohol manufacturers to label their ingredients or tell consumers what’s actually in their drinks,”[[1]](#footnote-1) and cited various brands that “are trying to slowly poison us with cheap and harmful ingredients.”[[2]](#footnote-2) In response to the question of how alcohol fits with MAHA, Calley Means, a special advisor to HHS Secretary Kennedy, stated “Phase 1 of MAHA is full transparency on what’s making us sick to the American people.”[[3]](#footnote-3)

CFA welcomes this call for full transparency, which we have been asking for in alcohol labeling for over 20 years. Better labeling will not eliminate all alcohol-related harms, but the available evidence indicates that it will help reduce those harms. For instance, researchers have documented that consumers are aware of calorie counts for alcohol on restaurant menus,[[4]](#footnote-4) and that enactment of state laws requiring menu calorie labeling for alcohol were correlated with a small but significant decline in reported alcohol consumption.[[5]](#footnote-5)

Similarly, researchers have found that labels with information about the number of standard drinks per container and low risk drinking guidelines help consumers to more accurately estimate their alcohol consumption than percentage alcohol by volume (%ABV) alone.[[6]](#footnote-6) Even consumers that do not pay attention to alcohol labels may still benefit from a broader population shift towards more conscientious consumption. Across the world, research shows that declines in the overall level of alcohol consumption—the average per capita consumption—coincide with reduced alcohol-related harms.[[7]](#footnote-7)

These spillover effects support a broad range of policies to provide accurate information to consumers about alcohol, both on and off the label. In particular, as President Trump’s nominee for Surgeon General, Casey Means, has pointed out, “people don’t realize [] that alcohol is the third biggest risk factor for cancer other than smoking and obesity,” and that “[e]ven 1 drink per day can increase the risk of some cancers.”[[8]](#footnote-8) The combined high public health burden, and low public awareness, of alcohol attributable cancers support lower recommended limits for “moderate drinking” in the Dietary Guidelines for Americans, and a cancer warning on alcohol labels. Updating the health warning statement on labels will require Congress to amend the Alcoholic Beverage Labeling Act of 1988, and so the Administration will need to exercise leadership to accomplish that worthy objective. In the meantime, however, TTB should follow through on this rulemaking and its pledge to propose a rule requiring ingredients disclosure.

There is no good reason for alcohol labels to omit the standard information consumers see on the labels of every other food and beverage product. This era of alcohol labeling exceptionalism can end with this Administration and absolutely should if the MAHA agenda is to be taken seriously.

Thank you for your consideration of these comments.

Sincerely,

Thomas Gremillion

Director of Food Policy

Consumer Federation of America

1. <https://foodbabe.com/alcoholic-drink/> [↑](#footnote-ref-1)
2. <https://foodbabe.com/the-shocking-ingredients-in-beer/> [↑](#footnote-ref-2)
3. <https://www.statnews.com/2025/01/14/alcohol-health-risks-rfk-jr-maha> [↑](#footnote-ref-3)
4. <https://link.springer.com/article/10.17269/s41997-021-00599-0> [↑](#footnote-ref-4)
5. <https://www.sciencedirect.com/science/article/abs/pii/S0091743517302359> [↑](#footnote-ref-5)
6. <https://link.springer.com/article/10.1186/s12889-023-16327-x> [↑](#footnote-ref-6)
7. Rossow I, Mäkelä P. Public Health Thinking Around Alcohol-Related Harm: Why Does Per Capita Consumption Matter? J Stud Alcohol Drugs. 2021 Jan;82(1):9-17. PMID: 33573718. [↑](#footnote-ref-7)
8. <https://www.caseymeans.com/learn/article-why-i-did-alcohol-free-dry-january> [↑](#footnote-ref-8)