

<< 0043313 >>

0003313
AMERICAN COUNCIL ON ALCOHOL PROBLEMS

October 13,2003

Chief, Regulations and Procedures Division
Alcohol & Tobacco Tax and Trade Bureau
P.O. Box 50221
Washington, DC 20091-0221

Dear Sir:

It has been called to my attention that you are considering two major changes to your current rules regarding flavored malt beverages as follows: (1) In order to be classified, taxed and regulated as a malt beverage like beer, alcoholic beverages must contain less than one-half of one percent (0.5%) of alcohol content by volume from added distilled spirits and flavorings. (2) TTB proposes changes in the labeling and advertising rules for "alcopop" malt beverages that derive more than 0.5 of alcohol by volume from non-brewed sources. You would also mandate that alcohol content be listed on the brand label and would limit the use of many misleading labeling terms. I suggest that all "alcopops" and beers be required to label the alcohol content Consumers should also be informed, with information on the label, concerning calories, serving size, ingredients, etc. on such items.

My major reason for supporting such proposed regulations has to do with underage drinking. Beer and "alcopops" both have a strong appeal to young people, as you well know. These changes would also prevent the makers of flavored malt beverages from manipulating existing laws to find the lowest taxes, easiest distribution and most accessible advertising possible.

Thank you for addressing this serious issue. The industry will be "crying in their beer" about "economic hardships" and "reduction in employment" But, the safety, health and general welfare of the public, especially our children and youth, are far more important than multiplied millions of dollars this industry is reaping annually.

I urge you to keep all regulations strong clear and uncompromisingly definitive which is in the best interest of public health and safety, With your leadership each state will be enabled to better regulate the sale of these products.

Thank you for your kind assistance. There is a great national concern about this issue.

D.L. Dan Ireland
Executive Director, American Council on Alcohol Problems

c.c. State Affiliates
Dr. D.L. Dan Ireland
Interim Director
2376 Lakeside Drive, Birmingham, Al. 35244 Office 205-989-8177 FAX 205-985-9015