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September 23, 2005

Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
Attn: Notice No. 41  
P.O. Box 14412  
Washington, D.C. 20444-4412

Dear Sir or Madam:

I am writing in support of a mandatory "Alcohol Facts" panel on labels of all alcoholic beverages, as announced in the Federal Register on April 29, 2005. I support this proposed standard from several perspectives, and in particular having worked to reduce alcohol abuse for over 30 years. I have worked in institutions of higher education for my entire professional career, with most of my experience focusing on young adults. In addition, I work closely with community groups, employees, parents, and many policymakers at the local, state and national level.

In my extensive involvement with this wide range of individuals, I am constantly amazed by the relative lack of knowledge about many facts surrounding alcohol use. In spite of the many educational initiatives that have been undertaken at many levels (schools, communities, worksite, public information campaigns), many youth and adults remain unaware of some of the basic facts surrounding alcohol. What does appear to have been communicated is the message about not driving while intoxicated. What does not appear to have been communicated, at least particularly well, is the message about how much alcohol content is in a specific drink; further, messages not well understood by the general public are how some individuals can become intoxicated with a small amount of alcohol, how gender and body weight affect individuals, and how individuals can vary widely in their response to alcohol.

What this suggests to me is *the need to provide accurate and concise information about basic alcohol facts in an easily-viewed format for the public.* Most important in this are facts about the alcohol content found in a container of alcohol; clearly specified should be (1) how many servings are included, and (2) how much alcohol content is included in each serving. Also for potential consideration would be information about calories included per serving, as this may be a reason that individuals would seek information from a summary chart on a container of alcohol.

This full information is important for several reasons. First, while the scientific community and health educators are very aware of these basic facts, as well as many more details surrounding the effects of alcohol, the general public is, in comparison, relatively unaware of even the basic facts. Second, the great variation in alcoholic beverages, drink sizes, and container sizes that are sold can promote confusion. As a

society, we are well served by minimizing such confusion. Some containers of alcohol have a single, standard size drink designed to be consumed directly (e.g., a 12-ounce can of beer). Other containers of alcohol, also designed for direct consumption, incorporate multiple standard size drinks (e.g., a bottle of wine). And other alcohol beverages are typically designed for multiple drinks, and are typically combined with a mixer (e.g., a distilled spirits bottle prepared for mixing drinks). Clear, concise information will be helpful to the public as decisions are made about alcohol consumption.

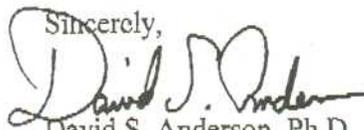
A third point is that the public has demonstrated increased interest in learning about health content of various foods; this interest is supported by the labeling that is now commonly found on food products. It is reasonable that the public would be interested in similar health-related information regarding their beverages, including alcohol content as well as other dietary information. Fourth, the public has demonstrated interest in changing their behavior regarding safety (i.e., driving safety) with relationship to alcohol. It is reasonable to expect, and to desire, that this safety concern would link to other non-driving issues (including, but not limited to, safe walking, falls, injury, and assault).

Fifth, I believe that we shoulder an ethical commitment to implement guidelines such as these. The American Association for Health Education's Code of Ethics states "Health Educators empower individuals to adopt healthy lifestyles through informed choice rather than by coercion or intimidation." Individuals will be more likely to adopt healthy and safe behaviors when they choose these behaviors; and, such behaviors are best facilitated when based on information that is sound, complete, and easy to understand. Finally, health professionals know, through approaches such as the Health Belief Model and the Stages of Change Model, that individuals require a basic foundation from which to implement change; "perceived susceptibility", "cues to action", and "contemplation" each serve as important elements of these approaches.

Simply stated, to encourage healthy and safe lifestyles, individuals (youth and adults) require quality information. This information must be accurate, complete, succinct and forthcoming. The proposed approach of labeling alcohol beverages with such information can be an important part (yet only a part) of efforts to achieve these ends of health and safety. Other approaches, of course, will be essential to complement this labeling. However, such labeling is an important and significant component of these overall efforts, and will help demonstrate a societal commitment to reducing health and safety concerns that may be associated with alcohol abuse and misuse.

I hope these comments and perspectives are helpful in your deliberations. Should you need further elaboration on any of these points, please contact me at 703-993-3697.

Thank-you.

Sincerely,  


David S. Anderson, Ph.D.  
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Director, Center for the Advancement  
of Public Health