

Elizabeth -
Where is this?
Elena

Date: 8/6/97

Please deliver the following pages to:

Name: Elena Kagan

Company: The White House

Fax number: 456-2878

Phone number:

Total # of pages including this cover sheet: 3

Sender: Tara Siegman, Project Assistant, Alcohol Policies, ext.341 (tsiegman@cspinet.org)

(Should you not receive all pages as indicated, call the sender.)

This message is intended only for the use of the individual or the entity to which it is addressed. It may contain information that is privileged or confidential. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this message is prohibited. If you have received this message in error, please notify us immediately by telephone.

Subject: wine health claims

Comments:

AMA letter to Secretary Rubin -

per George Hacker

American Medical Association

Physicians dedicated to the health of America



Percy Wootten, MD
President

515 North State Street
Chicago, Illinois 60610

312 464-4018
312 464-5648 Fax

August 5, 1997

The Honorable Robert E. Rubin, Secretary
Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, D.C. 20220

Dear Secretary Rubin:

I wish to express the American Medical Association's opposition to proposed changes by the Bureau of Alcohol, Tobacco and Firearms in the wording and placement of beneficial health claims for alcoholic beverages on product container labels. It is our concern that such claims would be misleading and, for many persons, inaccurate. The Wine Institute has proposed wording options that are biased in favor of product consumption and present potentially harmful messages to consumers. The labeling options are: "To learn the health effects of moderate wine consumption send for the federal government's dietary guidelines" or, "The proud people who make this wine encourage you to consult your family doctor about the health effects of wine enjoyment."

In each message, the wording fails to mention that both physicians and the dietary guidelines warn of the potential dangers many individuals face from moderate drinking. Children and adolescents, recovering alcoholics, women who are trying to conceive or who are pregnant, individuals with various illnesses or who are taking certain medications are at particular risk. Furthermore, while some research indicates that moderate drinking is associated with a decreased risk for some diseases, other research shows that such risks actually increase for certain people.

Before any changes are made in health effects labeling of alcoholic beverages, they must first be scientifically studied and evaluated for potentially negative individual and public health consequences. The proposed messages have not been tested against such rigorous standards. In fact, the health dangers presented by alcohol use indicate that labels need to contain more specific health warnings. For example, labels should clearly state that alcohol is a potentially addicting product and note the negative health conditions associated with its use. Such labeling also should contain explicit warnings about the need to limit one's use of alcohol.

150 Years of Caring for the Country
1847 • 1997

The Honorable Robert E. Rubin, Secretary
Department of the Treasury
August 5, 1997
Page 2

We support the concept that all people who are considering drinking alcohol or who are concerned about the potential health effects of drinking be encouraged to consult with their physicians. Equally important is the need to communicate that any consumption of alcohol, if not medically, legally or situationally contraindicated, should be moderate and very limited as the federal dietary guidelines clearly indicate.

Thank you for your consideration of this important public health issue.

Sincerely,

Percy Wootton, M.D.

Percy Wootton, M.D.
President

cc: Mr. John W. Magaw, Director
Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury
650 Massachusetts Avenue, NW
Washington, DC 20226

Mr. Lawrence H. Summers
Deputy Secretary
Department of the Treasury
1500 Pennsylvania Avenue, NW
Room 3326
Washington, DC 20226

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STROM THURMOND
SOUTH CAROLINA

PRESIDENT PRO TEMPORE
UNITED STATES SENATE

COMMITTEES
ARMED SERVICES CHAIRMAN
JUDICIARY
VETERANS AFFAIRS

United States Senate

WASHINGTON, DC 20510-4001

Personal attention July 28, 1997

Honorable Robert Rubin
Secretary of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Dear Mr. Secretary:

It has come to my attention that the Bureau of Alcohol, Tobacco and Firearms (BATF) is considering a proposal to approve health claim statements for wine labels. I encourage you to oppose this proposal.

As you know, alcohol abuse is a serious problem in our Country. For years, drunk driving, underage drinking, drinking during pregnancy, and alcoholism have had devastating effects on the health and safety of our citizens. During the 1980s, I worked very hard to pass the law that requires alcohol containers to carry a government health warning on the label. This warning informs consumers of the dangers of alcohol abuse.

I am concerned that if the ATF approves special labels for wine that claim health benefits, the intent of the current health warning will be undermined. If a wine label suggests that drinking wine is healthy, citizens may be encouraged to drink more alcohol. It is sound health policy to discourage the consumption of alcohol, and I strongly urge you to reject any new labels that may actually lead to increased alcohol consumption.

I thank you for your attention to this matter.

With kindest regards and best wishes,

Sincerely,

Strom Thurmond
Strom Thurmond

ST/lx

[illegible]

July 22, 1997

Dear Mr. Secretary:

Please find enclosed a copy of a letter from the Assistant Secretary of Health of the Department of Health and Human Services (HHS) to the Director of the BATF expressing serious concern about approval of directional health effects labels for wine. I share the concerns expressed by the Assistant Secretary and would hope that the BATF would forestall approval of this proposal, and, instead, work with the HHS to ensure that any action taken with regard to labeling does not jeopardize the public health.

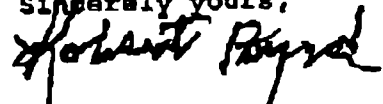
According to the National Institute on Alcohol Abuse and Alcoholism (NIAAA), alcohol abuse and alcoholism cost society over \$100 billion annually and each year over 100,000 deaths have alcohol-related causes. Drunk driving deaths in 1995 totaled 17,274. Also, alcohol consumption is related to increased violence and crime. Given the great costs imposed on society by alcohol consumption, I believe that granting government consent to labels that could potentially offset the current warning labels on wine and encourage consumption is ill advised. I urge you to continue to work with HHS officials to address their concerns about the effects that directional health effects labels could have on the public health.

Page 2

Your consideration of my concern in this regard is appreciated,
and I look forward to hearing from you on this important
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With kind regards, I am

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Robert C. Byrd

RCB:kl
Enclosure

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August 5, 1997
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I thank you for your attention to this matter.

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ST/lx

UNITED STATES SENATE
 COMMITTEE ON APPROPRIATIONS
 WASHINGTON, DC 20510-6026

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 COMMITTEE ON APPROPRIATIONS
 WASHINGTON, DC 20510-6026

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 Secretary
 Department of the Treasury
 1500 Pennsylvania Avenue, N.W.
 Washington, D.C. 20220

Dear Mr. Secretary:

It is my understanding that the Bureau of Alcohol, Tobacco, and Firearms (BATF) is considering approving a proposal to allow directional health effects labeling for wine. I encourage you to oppose the approval of health effects labels.

Please find enclosed a copy of a letter from the Assistant Secretary of Health of the Department of Health and Human Services (HHS) to the Director of the BATF expressing serious concern about approval of directional health effects labels for wine. I share the concerns expressed by the Assistant Secretary and would hope that the BATF would forestall approval of this proposal, and, instead, work with the HHS to ensure that any action taken with regard to labeling does not jeopardize the public health.

In light of the BATF's anticipated approval of a proposal which our nation's health officials believe could potentially harm the public health, I question whether the BATF is the appropriate agency to have jurisdiction over alcohol labeling. Perhaps authority over labeling issues, which clearly have a health impact, would be better placed at an agency such as the Food and Drug Administration, which has the health care expertise and experience to make sound public health decisions.

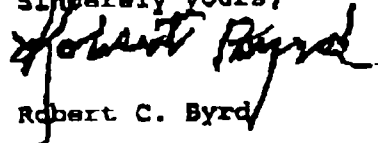
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Page 2

Your consideration of my concern in this regard is appreciated,
and I look forward to hearing from you on this important
matter.

With kind regards, I am

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Robert C. Byrd". The signature is fluid and cursive, with the first name "Robert" and last name "Byrd" clearly distinguishable. It is positioned above the printed name.

Robert C. Byrd

RCB:kl
Enclosure

CSPI

CENTER
FOR SCIENCE
IN THE
PUBLIC INTEREST

Publisher of **Nutrition Action Healthletter**

Bruce, Elizabeth - (+return)
Are we seriously considering
doing this? Why?

Eliz- could you find out
when this is?
Thanks

Elena

Date: 7/11

Please deliver the following pages to:

Name: Elena Kagen

Company: Domestic Policy Council, White House

Fax number: 456-2878

Phone number: 456-5584

Total # of pages *including* this cover sheet: 2

Sender: Tara Siegman, Project Assistant, Alcohol Policies, ext.341 (tsiegman@cspinet.org)

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Subject: wine labeling

Comments:

We discussed this earlier this week. Hope you can help support a public health approach to this issue.

George Hacker/s

BUSINESS

FRIDAY, JULY 11, 1997

G1

THE REGULATORS

Grapevine Ruling

To Your Health: Vintners Poised for a More Positive Labeling

By Cindy Skrzycki
Washington Post Staff Writer

After years of lobbying the Treasury Department's Bureau of Alcohol, Tobacco and Firearms for more favorable labeling treatment, the wine industry hopes to raise a glass soon to celebrate approval of a label that could suggest to imbibers that moderate drinking can be good for their health.

What the wine industry is seeking is the government's go-ahead to attach to its bottles a new label that would stress the health effects of drinking to offset the surgeon general's warning that drinking alcoholic beverages may cause health problems, especially if you're pregnant.

If the ATF grants permission, which might be in the next few weeks, vintners could state on

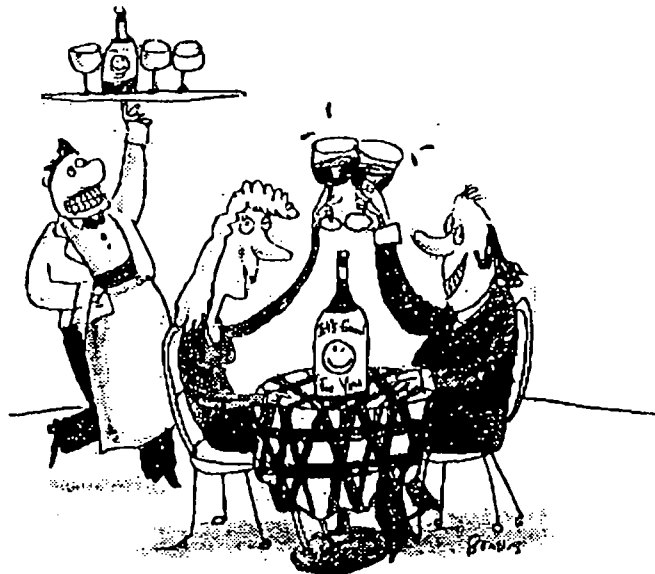
their bottles, "To learn the health effects of moderate wine consumption, send for the federal government's Dietary Guidelines for Americans. . . ." An address and Web site directions would follow.

Harriett Bobo, a top ATF official, said no decision has been made to approve several requests for the new labels, but if the ATF goes along with the idea it will also consider a rule to decide future labeling issues.

The ATF last year had some 65,000 requests for label changes on alcoholic beverages, some of them involving health issues.

For the wine industry, the government's issuance of the Dietary Guidelines, which are broad recommendations on diet and nutrition, provided the

See THE REGULATORS, G2, Col. 3



BY KEITH BENNING FOR THE WASHINGTON POST

Wine Industry Awaits

THE REGULATORS, From G1

opening to try to change years of ATF policy that has prohibited promotion of wine as a medicinal or a curative.

The bureau even frowned on wineries passing along positive press about their products, such as telling customers about the "French paradox"—the relatively low rates of heart disease among the red wine-drinking French despite their consumption of fatty foods.

The ATF's last word on what it might consider a valid health claim was a 1993 industry circular: "... Health claims are considered to be misleading unless they are properly qualified, present all sides of the issue, and outline the categories of individuals for whom any positive effects would be outweighed by numerous negative health effects. ATF considers it extremely unlikely that such a balanced claim would fit on a normal alcoholic beverage label."

The Wine Institute, representing some 400 California vintners, dealt with that problem by proposing to Treasury the label that would direct consumers to the Dietary Guidelines. The industry argues that the label will offset the surgeon general's message, which, it said, "reflects neither the balance nor the latest scientific evidence contained in the revised Dietary Guidelines."

Over the past few years, the Wine Institute has been lobbying intensively to spread the word that a glass of wine can be good for you, basing its claims on studies on alcohol consumption and breast cancer, osteoporosis, heart disease and countless other ailments.

The industry was successful in

persuading Congress to allocate some \$2.7 million to studies of drinking moderation. It also persuaded the Department of Health and Human Services to revise the guidelines. It worked tirelessly to change perceptions about wine, considering it a "gala" a "legitimate component of a nation's lifestyle."

John DeLuca, president of the Wine Institute, said the guidelines give full weight to the risks and benefits of moderate consumption. The guidelines talk about abuse as well as health, said DeLuca. "They are cautionary."

All of this and the fact that the ATF may approve a label has outraged some groups and, notably, the HHS, coauthor of the guidelines.

Opponents feel that such as "health" and "moderation" will encourage people to drink. They doubt that many people will check the guidelines the first time, said a spokesman. Consumption of wine is 5 ounces a day and two for men—that is, healthful, if taken in moderation. That said, there were passages on why alcohol should be avoided and why it is at risk from drinking.

"One sentence in the guidelines talks about potential benefits for individuals. It shouldn't allow the wine industry to become the surrogate for the surgeon general," said George Hacker, director of the Alcohol Policy Center for the U.S. Public Interest.

Hacker said the industry was successful in opposing to drinking

Label Ruling

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Wine Institute
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science done on the subject. But
he insists that information given
to consumers must be better
defined and clearly indicate who
will benefit. He suggested the
complete text of the guidelines be
attached to every bottle.

The most scathing criticism of
the proposal came from John
Eisenberg, acting assistant
secretary for health at HHS, who
wrote to the bureau saying, "I am
concerned that such directional
labeling on wine or any alcoholic
beverage may mislead
consumers and diminish the
effectiveness of the federally
mandated health warning." He
suggested that before any
changes are made they should be
"thoroughly field tested to assure
that they are not misleading."

ATF, in its response to
Eisenberg, said "... These
statements are 'directional,' in
that they merely direct the
consumer to a qualified source of
information regarding the health
effects of alcohol consumption."
It added that the statements are
neutral.

To that, Eisenberg shot off
another letter Wednesday, telling
the ATF that while it has the
authority to proceed, approval
would be inconsistent with the
public's health.

"The proposal under
consideration is a thinly
disguised attempt to make an
affirmative health claim," he said,
urging the ATF not to approve the
label.

As for relying on the
guidelines, he advises that they
are an "inadequate source of
information" for consumers who
are more likely to interpret the
"plain meaning" of the words on
the bottle.

MEMORANDUM TO ELENA KAGAN

FROM: HIMA VATTI

THROUGH: ELIZABETH DRYE
Associate Director, DPC

DATE: JULY 9, 1997

SUBJECT: BACKGROUND AND UPDATE ON WINE LABELING ISSUE

On Monday, July 14, Elizabeth Drye and Leanne Shimabukuro will convene a meeting with members of HHS, NIAAA, and BATF to discuss BATF's consideration of two proposed wine bottle labels that direct consumers to consult a physician or the U.S Dietary Guidelines to learn about the health effects of moderate wine consumption. The proposed labels approximately state:

1. For information about the health effects of moderate wine enjoyment, consult your family physician.
2. For information about the health effects of moderate wine consumption, consult the U.S. Dietary Guidelines, available at *USDA website*.

HHS strongly believes that these labels would reduce the effectiveness of the federally mandated health warning included on all beverage alcohol containers. The labels are inexplicit and misleading. The consumer is likely to interpret health "effects" as "benefits." The statements imply that anyone can benefit from the health effects of moderate consumption by neglecting to state that alcoholic beverages are contraindicated for underage youth, pregnant women, recovering alcoholics, and patients on certain prescription medications. The proposed labels do not advise the consumer to learn about the potential risks of alcohol consumption. For some consumers, consumption of alcoholic beverages reduces the risk for a narrow range of health conditions. In general, however, alcohol increases the risk of negative health effects. The consumer who drinks can minimize this risk by drinking in moderation, but moderate drinking neither eliminates nor counteracts the risk. Furthermore, the labels fail to define moderate consumption. NIAAA studies show that the individual consumer often overestimates what constitutes moderate consumption, because she usually misinterprets moderation to mean the amount she herself drinks.

HHS Chief of Staff met with senior Treasury Department officials to discuss this matter on June 18, 1997. BATF disagrees that the labels are misleading and inconsistent with the government warning label. BATF characterizes the statements as "directional." The labels make no claims about health benefits or risks, but direct the consumer to qualified sources of information about the health effects of moderate alcohol consumption. In BATF's view, the labels make no claims about health benefits or risks or contradict the warning label in any way. The consumer would receive balanced information about alcohol consumption from either her family physician or the Dietary Guidelines. HHS, however, doubts that

consumers will actually consult their physicians or access the Dietary Guidelines on the web to receive accurate information. By signalling health "effects", the labels would encourage the consumer to assume that she will receive healthy effects or benefits by drinking her habitual amount of the beverage. This result would frustrate HHS's drive to continue to reduce alcohol consumption by Americans. Furthermore, the Dietary Guidelines do not provide the consumer with enough individualized details about the health risks and benefits of alcohol consumption to make a fully informed decision to drink.

HHS urges BATF to delay approving the new wine labels until HHS can evaluate the effect they would have on the public's level of alcohol consumption and perception of alcohol's health consequences. On Thursday, July 9, HHS released to the press the two letters exchanged between John Eisenberg, Acting Assistant Secretary for Health at HHS, and John Magaw, Director of BATF, which outline each side's take on the wine labeling issue. The OPD will seek more information from relevant federal parties at the July 14 meeting.

John Manfreda
Deputy Chief Counsel
BATF

927-8209

Attendees of 7/16/97 (Wed 1:00 PM-180)
Wine Labeling Mtg.

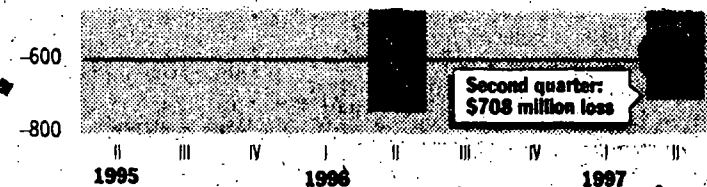
Elizabeth, Leanne, Thima

- | | |
|---|---|
| 1. Ripley Forbes | V. 6. Harriet Bobo |
| 2. Dr. Enoch Gordas
(Dir. NIAAA) | <u> </u> (Chief of Enforcement, BATF) |
| 3. Mary DuFour, MD/MPH
(Dep. Dir. NIAAA) | 7. John Manfreda
(Dep. Chief Counsel, BATF) |
| 4. Geoffrey Laredo
(Program Analyst w/
Office of Policy Analysis
at NIAAA) | 8. Bill Foxx
(Sr. Counsel, BATF) |
| 5. Terrett Clinton
(Acting Surgeon General) | 9. Terry Bowerman
(Division Chief on
Alcohol + Tobacco Programs
- it is his division
that would actually
approve the labels) |

- I'll have all wave info. by Mon. noon.

- Most of these people were actually going to meet at BATF Wed. at 3:00. But Harriet saw the wisdom of coming to our meeting instead!

...companies such as C... which rely on middle to sell machines. The days of 10 to 15 percent price increases between Dell and its big competitors are over," said Roger a senior analyst at International Corp., a Framingham, Mass., research firm that tracks the computer industry. He said Dell's See CO PUTER, G2, Col. 1



at a multibillion-dollar payday if the is approved. The attorneys, who gotten rich charging employers upward of \$400 an hour for their time, will have to scramble to make up the shortfall, legal experts say.

Especially hard hit would be D.C. firms like Arnold & Porter, which represents Philip Morris Co., and Covington & Burling, which works for the Tobacco Institute, the cigarette companies' lobbying arm. The settlement calls for the institute to close its doors.

Congress gets done they probably stand at 300 pages. Some is going to figure what of pages mean."

According to Black and other experts, if Congress approves the deal in anything close to its present form, a battalion of regulatory lawyers will be deployed by tobacco companies to fight over interpretation of the Food and Drug Administration's regulation of cigarettes. Another legion of attorneys

See TOBACCO, G3, Col. 4

business. MCI at Timothy Price said earnings of \$1.20 per share, likely to be "more like a share," largely due to \$800 million in MCI's one business. Eric Rabe, MCI's vice president for local phone service, said it was "a relief" for MCI to blame the carriers.

Airbus, whose public relations suffered since a May crash in the Florida Everglades, is buying AirTran and plans to drop the name. The deal will be completed through a stock swap valued at \$61.8 million. The acquisition of ValuJet and AirTran's parent company, would have 2,742 employees and serve 46 cities with aircraft and 238 peak departures. The new carrier See DIGEST, G8, Col. 1

the second quarter. Page G3
data recorders. Page G3

THE REGULATORS

Grapevine Ruling

To Your Health: Vintners Poised for a More Positive Labeling

By Cindy Skrzycki
Washington Post Staff Writer

After years of lobbying the Treasury Department's Bureau of Alcohol, Tobacco and Firearms for more favorable labeling treatment, the wine industry hopes to raise a glass soon to celebrate approval of a label that could suggest to imbibers that moderate drinking can be good for their health.

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See THE REGULATORS, G2, Col. 3



BY KEITH BENDIS FOR THE WASHINGTON POST

Wash post
Business P. 1
Fri. July 11

Wine Industry Awaits Label Ruling

THE REGULATORS, From G1

opening to try to change years of ATF policy that has prohibited promotion of wine as a medicinal or a curative.

The bureau even frowned on wineries passing along positive press about their products, such as telling customers about the "French paradox"—the relatively low rates of heart disease among the red wine-drinking French despite their consumption of fatty foods.

The ATF's last word on what it might consider a valid health claim was a 1993 industry circular: "... Health claims are considered to be misleading unless they are properly qualified, present all sides of the issue, and outline the categories of individuals for whom any positive effects would be outweighed by numerous negative health effects. ATF considers it extremely unlikely that such a balanced claim would fit on a normal alcoholic beverage label."

The Wine Institute, representing some 400 California vintners, dealt with that problem by proposing to Treasury the label that would direct consumers to the Dietary Guidelines. The industry argues that the label will offset the surgeon general's message, which, it said, "reflects neither the balance nor the latest scientific evidence contained in the revised Dietary Guidelines."

Over the past few years, the Wine Institute has been lobbying intensively to spread the word that a glass of wine can be good for you, basing its claims on studies on alcohol consumption and breast cancer, osteoporosis, heart disease and countless other ailments.

The industry was successful in

persuading Congress to direct some \$2.7 million to fund 15 studies of drinking in moderation. It also supplied studies to the Department of Health and Human Services when the guidelines were in the works. It worked tirelessly to change perceptions about wine from considering it a "gateway drug" to a "legitimate component of the nation's lifestyle."

John DeLuca, president of the Wine Institute, said the guidelines give full disclosure on the risks and benefits of moderate consumption. "The guidelines talk about risks of abuse as well as health effects," said DeLuca. "They are cautionary."

All of this and the possibility that the ATF may approve the label has outraged food safety groups and, notably, officials at HHS, coauthor of the guidelines.

Opponents feel that words such as "health" and "moderation" will encourage people to drink. There also is doubt that many people will check the guidelines, which, for the first time, said moderate consumption of wine—one 5-ounce glass a day for women and two for men—might be healthful, if taken with a meal. That said, there were also long passages on why alcohol should be avoided and which groups are at risk from drinking.

"One sentence in 60 sentences in the guidelines talks about the potential benefits for some individuals. It [the reference] shouldn't allow the Wine Institute to become the surgeon general," said George Hacker, director of the Alcohol Policies Project for the Center for Science in the Public Interest.

Hacker said the center isn't opposed to drinking or the

science done on the subject. But he insists that information given to consumers must be better defined and clearly indicate who will benefit. He suggested the complete text of the guidelines be attached to every bottle.

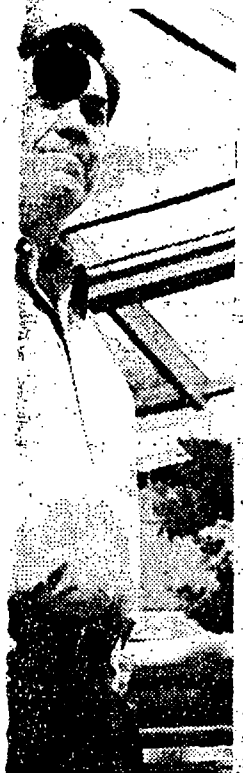
The most scathing criticism of the proposal came from John Eisenberg, acting assistant secretary for health at HHS, who wrote to the bureau saying, "I am concerned that such directional labeling on wine or any alcoholic beverage may mislead consumers and diminish the effectiveness of the federally mandated health warning." He suggested that before any changes are made they should be "thoroughly field tested to assure that they are not misleading."

ATF, in its response to Eisenberg, said "... These statements are directional, in that they merely direct the consumer to a qualified source of information regarding the health effects of alcohol consumption." It added that the statements are neutral.

To that, Eisenberg shot off another letter Wednesday, telling the ATF that while it has the authority to proceed, approval would be inconsistent with the public's health.

"The proposal under consideration is a thinly disguised attempt to make an affirmative health claim," he said, urging the ATF not to approve the label.

As for relying on the guidelines, he advises that they are an "inadequate source of information" for consumers who are more likely to interpret the "plain meaning" of the words on the bottle.



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ROOM 719-H
WASHINGTON, D.C. 20201
Phone: (202) 260-2549
Fax: (202) 260-1570

DATE: 7-9-97
NAME: Elizabeth Dye
FAX NUMBER: 456-5581 or 456-7431

FROM: Ripley Forbes
Senior Advisor to the Assistant Secretary for Health

Total Number of Pages (Including Cover): 3

Additional Comments:

ALCONOL!!

Bill wants you to
have this letter!

RFB



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Office of the Secretary

Assistant Secretary for Health
Office of Public Health and Science
Washington D.C. 20201

JUL - 9 1997

Mr. John W. Magaw
Director
Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury
650 Massachusetts Avenue, N.W.
Washington, D.C. 20226

Dear Mr. Magaw:

I have received your July 1 letter on the addition of so-called "directional health effects labels" for wine. I am disappointed by the manner in which our concerns about the potentially damaging effect of these label statements on public health have been considered. The proposal under consideration is a thinly disguised attempt to make an affirmative health claim. Modest grammatical changes can not alter the intent of the label's sponsors to provide balance to the federally mandated Surgeon General's warning. I am deeply concerned that your approval of the label statements in their current form could be construed by the public as encouraging the consumption of alcoholic beverages.

Furthermore, your explanation that referring consumers to a government publication which offers balanced information is only credible if there is a reasonable likelihood that such referral will in fact result. I am unaware of any major body of consumer marketing research which confirms that such directional referrals result in substantial numbers of consumers requesting and reading the government publication. More likely, consumers will interpret the plain meaning of the words which at best offer no useful information about the health effects of wine consumption and at worst would reinforce existing inaccurate knowledge about moderation and the health effects resulting from consumption of alcoholic beverages. If the objective is to inform consumers, let us work together to develop a sound and effective initiative.

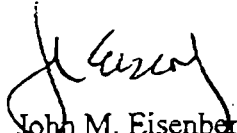
As you know, the Department's Chief of Staff and several members of my staff met with senior Treasury Department officials about this matter on June 18, 1997. We elaborated on our objections to your agency's approval of these labels in their current form. We offered to assist in gathering information and suggested that you may wish to request the wine industry to voluntarily submit any market research they had which had a bearing on this subject. Thus, I am dismayed by, and disagree with your statement that the proposed labels are consistent with the Government warning label and would not otherwise tend to mislead consumers. Your conclusion to proceed with the proposed directional labels is a subjective judgement -- one which is within the discretion of your statutory authority but one which is inconsistent with the public's health.

Page 2 - Mr. John W. Magaw

Since our last meeting, we have asked the National Institute on Alcohol Abuse and Alcoholism (NIAAA) to review the literature on public attitudes towards "moderate consumption." The NIAAA confirms that there is wide variability and misunderstanding among consumer and health professionals on this point. Directional labeling which fails to define moderation in accordance with the Dietary Guidelines would tend to reinforce current levels of misunderstanding and undermine our Department's and the Administration's public health goals. Furthermore, evidence suggests that the Guidelines are an inadequate source of information for consumers or health professionals to make fully informed choices. More valid and comprehensive documents on "health effects" of alcoholic beverages are available, and we would be pleased to share them with you.

I again urge you to defer final action on these proposals until additional information has been gathered to address the Department's concerns about the effect on public health. We would be pleased to meet with you to discuss these issues in more detail and believe it would be helpful to include the senior leadership of both Departments as well as senior scientists from the NIAAA.

Sincerely yours,

A handwritten signature in black ink, appearing to read "J. Eisenberg", is written over the printed name.

John M. Eisenberg, M.D.

Acting Assistant Secretary for Health

Bruce/Elizabeth

MEMORANDUM

To: Elena Kagan
From: George Hacker *George Hacker*
Re: Proposed Health Claims for Wine at ATF
Date: August 1, 1997

As I indicated when we met in the Roosevelt Room on July 8, the Bureau of Alcohol, Tobacco, and Firearms (ATF) seems intent on approving a label application for wine that would make an inappropriate and misleading health claim which could lead to increased alcohol consumption and higher levels of alcohol problems. Previously, I sent you a package of information containing correspondence between the Public Health Service (which opposes the labels) and other relevant documents, including the language of a recent AMA resolution opposing "beneficial health claims" for alcohol.

Today, I am forwarding letters to ATF from Senators Robert Byrd and Strom Thurmond, also opposing the proposed labels.

One of the avowed purposes of the proposed "directional" labels is to undermine the cautionary language of the current required warning label. Vice President Gore was the leader of efforts in the Senate to pass that legislation in 1988; perhaps he is now interested in protecting his accomplishment from attacks by the wine industry. Would you please share this information -- as well as what I previously sent to you -- with his office. If you need additional copies, please call me at (202) 332-9110, ext. 343.

Thank you very much for your consideration and assistance.

STROM THURMOND
SOUTH CAROLINA

PRESIDENT PRO TEMPORE
UNITED STATES SENATE

COMMITTEES
ARMED SERVICES, CHAIRMAN
JUDICIARY
VETERANS' AFFAIRS

United States Senate

WASHINGTON, DC 20510-4001

Personal attention July 28, 1997

Honorable Robert Rubin
Secretary of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Dear Mr. Secretary:

It has come to my attention that the Bureau of Alcohol, Tobacco and Firearms (BATF) is considering a proposal to approve health claim statements for wine labels. I encourage you to oppose this proposal.

As you know, alcohol abuse is a serious problem in our Country. For years, drunk driving, underage drinking, drinking during pregnancy, and alcoholism have had devastating effects on the health and safety of our citizens. During the 1980s, I worked very hard to pass the law that requires alcohol containers to carry a government health warning on the label. This warning informs consumers of the dangers of alcohol abuse.

I am concerned that if the ATF approves special labels for wine that claim health benefits, the intent of the current health warning will be undermined. If a wine label suggests that drinking wine is healthy, citizens may be encouraged to drink more alcohol. It is sound health policy to discourage the consumption of alcohol, and I strongly urge you to reject any new labels that may actually lead to increased alcohol consumption.

I thank you for your attention to this matter.

With kindest regards and best wishes,

Sincerely,

Strom Thurmond
Strom Thurmond

ST/lx

U.S. SENATE, WASHINGTON, D.C.

THOMAS H. DUNN, MISSISSIPPI
ALBERT J. FERTER, NEW YORK
JIM W. COOPER, NEW MEXICO
JAMES H. HODGES, MISSOURI
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KATHLEEN BOHAN, CALIFORNIA

United States Senate

COMMITTEE ON APPROPRIATIONS

WASHINGTON, DC 20510-8075

JIMMY J. CORTESE, STAFF DIRECTOR
ANDREW MILLER, CHIEF OF STAFF DIRECTOR

July 22, 1997

The Honorable Robert Rubin
Secretary
Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, D.C. 20220

Dear Mr. Secretary:

It is my understanding that the Bureau of Alcohol, Tobacco, and Firearms (BATF) is considering approving a proposal to allow directional health effects labeling for wine. I encourage you to oppose the approval of health effects labels.

Please find enclosed a copy of a letter from the Assistant Secretary of Health of the Department of Health and Human Services (HHS) to the Director of the BATF expressing serious concern about approval of directional health effects labels for wine. I share the concerns expressed by the Assistant Secretary and would hope that the BATF would forestall approval of this proposal, and, instead, work with the HHS to ensure that any action taken with regard to labeling does not jeopardize the public health.

In light of the BATF's anticipated approval of a proposal which our nation's health officials believe could potentially harm the public health, I question whether the BATF is the appropriate agency to have jurisdiction over alcohol labeling. Perhaps authority over labeling issues, which clearly have a health impact, would be better placed at an agency such as the Food and Drug Administration, which has the health care expertise and experience to make sound public health decisions.

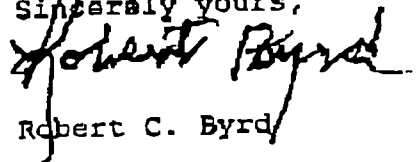
According to the National Institute on Alcohol Abuse and Alcoholism (NIAAA), alcohol abuse and alcoholism cost society over \$100 billion annually and each year over 100,000 deaths have alcohol-related causes. Drunk driving deaths in 1995 totaled 17,274. Also, alcohol consumption is related to increased violence and crime. Given the great costs imposed on society by alcohol consumption, I believe that granting government consent to labels that could potentially offset the current warning labels on wine and encourage consumption is ill advised. I urge you to continue to work with HHS officials to address their concerns about the effects that directional health effects labels could have on the public health.

Page 2

Your consideration of my concern in this regard is appreciated,
and I look forward to hearing from you on this important
matter.

With kind regards, I am

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Robert C. Byrd". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Robert C. Byrd

RCB:kl
Enclosure

-- passed by the AMA House of Delegates at its June 1997 meeting --

Reference Committee D, Page 6

(8) RESOLUTION 439 - HEALTH CLAIMS ON ALCOHOLIC
BEVERAGE LABELS

RECOMMENDATION A:

Mr. Speaker, your Reference Committee recommends that Resolution 439 amended by insertion on lines 21-23 to read as follows:

RESOLVED, That the American Medical Association urge the Bureau of Alcohol, Tobacco and Firearms to continue to reject proposals by the alcoholic beverage industry for authorization to place beneficial health claims for its products on container labels.

RECOMMENDATION B:

Mr. Speaker, your Reference Committee recommends that Resolution 439 be adopted as amended.

Resolution 439 asks our AMA to urge the Bureau of Alcohol, Tobacco and Firearms to reject proposals that would permit health claims on the labels for alcoholic beverages.

Limited testimony was heard on Resolution 439, but it was suggested that positive or favorable health claims be prohibited, since, for example, an unqualified statement might be construed to prohibit cautionary language regarding drinking and driving.

(9) COUNCIL ON SCIENTIFIC AFFAIRS REPORT 14 - DRIVERS
IMPAIRED BY ALCOHOL

RECOMMENDATION A:

Mr. Speaker, your Reference Committee recommends that a new Recommendation 7 be added to CSA Report 14 to read as follows:

That the AMA encourage the National Highway Traffic Safety Administration to investigate the feasibility of technologies that would prevent an automobile from being started or driven by an individual with an excessive blood alcohol level.

RECOMMENDATION B:

Mr. Speaker, your Reference Committee recommends that the recommendations in Report 14 of the Council of Scientific Affairs be adopted as amended in lieu of Resolution 423 (1-95) and the remainder of the report be filed.

Council on Scientific Affairs Report 14 provides background on the relationship of blood alcohol levels to driver impairment and discusses experiences in the United States and elsewhere with lower legal blood alcohol limits for drivers. The report recommends that public education messages should indicate that "all alcohol use, even at low levels, impairs driver performance and poses significant



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Office of the Secretary

Assistant Secretary for Health
Office of Public Health and Science
Washington D.C. 20201

JUL - 9 1997

Mr. John W. Magaw
Director
Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury
650 Massachusetts Avenue, N.W.
Washington, D.C. 20226

Dear Mr. Magaw:

I have received your July 1 letter on the addition of so-called "directional health effects labels" for wine. I am disappointed by the manner in which our concerns about the potentially damaging effect of these label statements on public health have been considered. The proposal under consideration is a thinly disguised attempt to make an affirmative health claim. Modest grammatical changes can not alter the intent of the label's sponsors to provide balance to the federally mandated Surgeon General's warning. I am deeply concerned that your approval of the label statements in their current form could be construed by the public as encouraging the consumption of alcoholic beverages.

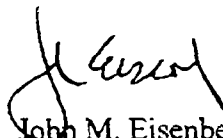
Furthermore, your explanation that referring consumers to a government publication which offers balanced information is only credible if there is a reasonable likelihood that such referral will in fact result. I am unaware of any major body of consumer marketing research which confirms that such directional referrals result in substantial numbers of consumers requesting and reading the government publication. More likely, consumers will interpret the plain meaning of the words which at best offer no useful information about the health effects of wine consumption and at worst would reinforce existing inaccurate knowledge about moderation and the health effects resulting from consumption of alcoholic beverages. If the objective is to inform consumers, let us work together to develop a sound and effective initiative.

As you know, the Department's Chief of Staff and several members of my staff met with senior Treasury Department officials about this matter on June 18, 1997. We elaborated on our objections to your agency's approval of these labels in their current form. We offered to assist in gathering information and suggested that you may wish to request the wine industry to voluntarily submit any market research they had which had a bearing on this subject. Thus, I am dismayed by, and disagree with your statement that the proposed labels are consistent with the Government warning label and would not otherwise tend to mislead consumers. Your conclusion to proceed with the proposed directional labels is a subjective judgement -- one which is within the discretion of your statutory authority but one which is inconsistent with the public's health.

Since our last meeting, we have asked the National Institute on Alcohol Abuse and Alcoholism (NIAAA) to review the literature on public attitudes towards "moderate consumption." The NIAAA confirms that there is wide variability and misunderstanding among consumer and health professionals on this point. Directional labeling which fails to define moderation in accordance with the Dietary Guidelines would tend to reinforce current levels of misunderstanding and undermine our Department's and the Administration's public health goals. Furthermore, evidence suggests that the Guidelines are an inadequate source of information for consumers or health professionals to make fully informed choices. More valid and comprehensive documents on "health effects" of alcoholic beverages are available, and we would be pleased to share them with you.

I again urge you to defer final action on these proposals until additional information has been gathered to address the Department's concerns about the effect on public health. We would be pleased to meet with you to discuss these issues in more detail and believe it would be helpful to include the senior leadership of both Departments as well as senior scientists from the NIAAA.

Sincerely yours,



John M. Eisenberg, M.D.
Acting Assistant Secretary for Health

*Guidelines
Fact*



DEPARTMENT OF HEALTH AND HUMAN SERVICES
U.S. PUBLIC HEALTH SERVICE
OFFICE OF PUBLIC HEALTH AND SCIENCE
200 INDEPENDENCE AVENUE, S.W.
ROOM 719-H
WASHINGTON, D.C. 20201
Phone: (202) 260-2549
Fax: (202) 260-1570

DATE: 7-2-97

NAME: Elizabeth Orye

FAX NUMBER: 456-5581

456-1647

FROM: Ripley Forbes
Senior Advisor to the Assistant Secretary for Health

Total Number of Pages (Including Cover): 6

Additional Comments:

Status/background on NHTS conflict w/ DoT Treasury (BATE)
over health effects labels on wine. We could
use some help in slowing Treasury down and
avoiding an interagency disagreement over public health.
Thanks! Rob



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Office of the Secretary

JUN 5 1997

Assistant Secretary for Health
Office of Public Health and Science
Washington D.C. 20201

Mr. John W. Magaw
Director
Bureau of Alcohol, Tobacco and Firearms
Department of the Treasury
650 Massachusetts Avenue, N.W.
Washington, D.C. 20226

Dear Mr. Magaw:

I understand that the Bureau is considering approving a request from two manufacturers to include a statement on wine bottles that directs a consumer to write for the U.S. Dietary Guidelines for Americans or consult a physician to learn more about the health effects associated with moderate alcohol consumption. I am concerned that inclusion of such directional labeling on wine or any alcoholic beverage may mislead consumers and diminish the effectiveness of the Federally mandated health warning.

Alcohol abuse and alcoholism are major public health problems in the United States. Their elimination or reduction is a priority of the Department, as highlighted in such documents as Healthy People 2000, the National Health Promotion and Disease Prevention Objectives, and in the Department's recently issued strategic plan. Before new labeling that refers to the health effects of alcoholic beverage consumption is approved, the changes should be thoroughly field tested to assure that they are not misleading. Any references to moderate alcohol consumption must be accurate, descriptive and based upon the U.S. Dietary Guidelines rather than left to individual interpretation or referral to a secondary source. Absent such objective assessment, the proposed directional health effects labels will have a serious and misleading influence on the American public, with serious adverse consequences to public health.

Since issuance of the 1995 edition of the Dietary Guidelines, much misinformation has been disseminated through the popular press about the health effects of alcohol consumption.

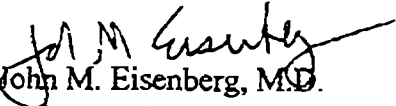
* Consumers, and particularly younger consumers, differ in their understanding of what constitutes moderate consumption. In general, consumers of alcoholic beverages overestimate what constitutes moderate consumption and underestimate the adverse health effects of such use. Furthermore, from the perspective of public health it is essential that directional labeling not have the effect of promoting the consumption of alcoholic beverages by underage youth or those populations who are at particular risk for adverse health consequences. This concern was described in the 1992 Alcohol Alert on Moderate Drinking from the National Institutes of Health's National Institute on Alcohol Abuse and Alcoholism.

*Drink
style
Don't
reproach*

The Department welcomes private sector efforts to assist in the dissemination of U.S. Dietary Guidelines. Such efforts should be comprehensive and make clear the full range of effects -- positive and negative -- associated with consumption of alcoholic beverages. The Department does not recommend that Americans begin consuming alcoholic beverages (especially underage youth) or that those who currently drink increase their consumption. Indeed, one of the key Healthy People 2000 objectives is to reduce alcohol consumption to no more than 2 gallons of ethanol per person annually. We have made progress toward this goal, but are concerned that additions to alcoholic beverage labeling, particularly additions that could have the effect of minimizing the health effects warning mandated by Congress, could result in increased consumption and reduce the progress made to date.

I know you share the concern that changes in the labels of alcoholic beverages be truthful and not misleading. I urge you to delay approving new health effects directional labeling for wine, or any alcoholic beverage, until the effects of such labeling on moderate consumption and perceptions of the adverse health consequences can be evaluated. We would be pleased to assist you in this effort. In addition, it would be reasonable to ask the applicants for such label changes to voluntarily submit any market research they may have done which would address this issue. I would be pleased to meet with you to discuss these issues in greater detail.

Sincerely yours,


John M. Eisenberg, M.D.
Acting Assistant Secretary for Health



DIRECTOR

DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, DC 20226

JUL 1 1997

John M. Eisenberg, M.D.
Acting Assistant Secretary for Health
Department of Health and Human Services
Office of Public Health and Science
Washington, DC 20201

Dear Dr. Eisenberg:

Thank you for your letter of June 5, 1997, in which you voice concerns over the Bureau of Alcohol, Tobacco and Firearms' (ATF) proposed approval of two wine labels bearing health related statements that refer consumers to their family doctors or to the U.S. Dietary Guidelines for Americans for information about the health effects of wine consumption. You are concerned that these statements could mislead consumers about the health effects associated with the consumption of alcohol beverages. You are also concerned that these statements could diminish the effectiveness of the Government Warning Statement required by the Alcoholic Beverage Labeling Act of 1988 (ABLA), 27 U.S.C. §§ 213 et seq.

As you may know, the Federal Alcohol Administration Act (FAA Act) (27 U.S.C. §§ 201 et seq.) authorizes ATF to promulgate regulations on the packaging, labeling, and advertising of alcohol beverages in order to prohibit deception of the consumer. These regulations prohibit statements on labels or in advertising of alcohol beverages which represent that the use of an alcohol beverage product has curative or therapeutic effects. Such statements are prohibited by these regulations if they are untrue in any particular, or tend to create a misleading impression.

* { Our policy in regard to health related statements on the labels of, or in advertising for alcoholic beverages is that such statements, even if supported by medical evidence, have an overall misleading effect unless they are properly qualified, give all sides of the issue, and outline the categories of individuals for whom any positive effect of consumption would be outweighed by numerous negative health effects. This policy was announced in ATF Industry Circular 93-8, dated August 2, 1993.

- 2 -

John M. Eisenberg, M.D.

We believe this policy is consistent with the ABLA. The ABLA requires that any alcohol beverage container held for sale or distribution in the United States must bear a warning statement which cautions against the risk of consuming alcohol while pregnant or while operating machinery or driving. To the extent that the overall message of any health related statement is inconsistent with the message of the government warning statement required by the ABLA, it would result in information that would tend to mislead the consumer and would be prohibited under the FAA Act.

X

The two pending applications for approval of wine labels do not violate ATF's stated policy, the FAA Act or the ABLA. Both of these statements are "directional," in that they merely direct the consumer to a qualified source of information regarding the health effects of alcohol consumption. Both statements are neutral. Neither statement characterizes health "benefits" nor "risks," but merely refers the consumer to another source of information about the "health effects" of alcohol consumption.

Moreover, both statements refer consumers to sources of information that should provide them with a balanced and detailed discussion of the health effects of alcohol consumption. The Dietary Guidelines contain a balanced and detailed discussion of the overall health effects of alcohol consumption. Presumably, a consumer who goes to his or her family physician will get similarly balanced and detailed information from a health professional who is familiar with the consumer's individual health profile.

*
For these reasons, we do not believe these statements are inconsistent with the Government warning statement required by the ABLA, nor do we believe these statements would otherwise tend to mislead consumers. Accordingly, we do not believe field surveys are necessary in connection with making an objective assessment about these statements. However, we will monitor reaction to the statements and, to the extent we receive other statements that are more substantive in nature, we will consider a survey as a method for determining whether the submission misleads consumers and thereby violates the FAA Act.

We share your concerns regarding the health problems created by alcohol abuse and alcoholism in the United States. We believe this concern is reflected in our

-3-

John N. Eisenberg, M.D.

detailed analysis of the health claims issue publicized in ATF Industry Circular 93-8. In that circular, we committed to undertake rulemaking on the question of health related statements in the labeling and advertising of alcohol beverages to ensure that the consumer is protected from misleading or deceptive statements. We also believe our denial of the petition filed by the Competitive Enterprise Institute (CEI) asking ATF for a rule allowing specific positive health claims on the label of alcohol beverages, not to mention our vigorous defense of the lawsuit filed by the CEI, illustrates our concern over the issues relating to alcohol abuse resulting from misleading or false health claims.

* [We would be happy to meet with you to discuss the issues relating to these statements further. Please feel free to contact Ms. Harriett Bobo, Deputy Associate Director (Regulatory Enforcement Field Operations) to schedule such a meeting. Ms. Bobo may be reached at 202-927-7950. Because of the time sensitivity of this matter, we ask that any such meeting be arranged as soon as possible.

Sincerely yours,

John W. Magaw
John W. Magaw
Director



DEPARTMENT OF HEALTH AND HUMAN SERVICES
U.S. PUBLIC HEALTH SERVICE
OFFICE OF PUBLIC HEALTH AND SCIENCE
200 INDEPENDENCE AVENUE, S.W.
ROOM 719-H

WASHINGTON, D.C. 20201

Phone: (202) 260-2549

Fax: (202) 260-1570

DATE:

7-2-97

NAME:

Elizabeth Dye

FAX NUMBER:

456-5581

FROM:

Ripley Forbes

Senior Advisor to the Assistant Secretary for Health

Total Number of Pages (Including Cover):

5

Additional Comments:

Talking points exploring NNS
concerns of the public health impact
of BATF's pending decision on wine.

"Labeling of Alcoholic Beverages"

General Comments

- * Labeling must not mislead consumers into underestimating the adverse health consequences of alcoholic beverage consumption nor encourage consumers to initiate or to increase their consumption.
- * Labeling must not introduce imagery or information which reduce the effectiveness of the Federally mandated health warning. For example, the consumption of alcoholic beverages is contraindicated for all consumers working with heavy machinery, driving automobiles, who are pregnant, underage, in recovery, or consuming certain prescription medications. Labeling placed in proximity to the Federal health warning should not create a misleading impression about the unilateral nature of the Federal warning.
- * The introduction of so-called "directional labeling", particularly labeling which a reasonable person might construe as a reference to health attributes, (eg "health effects", "dietary guidelines" "physicians") should, in the absence of contrary evidence, be presumed to be an implied or imputed reference to positive, health benefits and therefore be subjected to review for balance, comprehensiveness, relevance, clarity, and comprehension by the consumer.
- * Labeling of alcoholic beverages must not mislead consumers about the nature of moderate consumption. In general, consumers overestimate the number and size of drinks that constitute moderate alcohol consumption. References to "moderate consumption" in the absence of specific definitions that will aid consumers in gauging personal consumption, could increase the likelihood that consumers will exceed daily alcohol limits and increase the risk of a variety of adverse health conditions.

Specific Comments:

- * References to the U.S. Dietary Guidelines on an alcoholic beverage label should be carefully scrutinized for accuracy and balance.

- * References to moderate alcohol consumption must be accurate, descriptive and based upon the U.S. Dietary Guidelines. Each such reference should, at a minimum, include descriptions of drink limitations for men versus women and clearly identify the appropriate serving size (in fluid ounces) that constitutes a drink under the dietary guidelines.

HHS believes the proposed “Directional Label” for wine is “Misleading.”

- * Label creates misleading impression that “health effects” of “moderate wine consumption” apply to all consumers. In the absence of more specific information, consumers could conclude “moderate wine consumption” offers health benefits for all consumers.

- * 1) Consumption of wine is contraindicated for large segments of population.
 - underage youth;
 - pregnant women;
 - recovering alcoholics;
 - patients on certain prescription medications;

- 2) Consumption of alcoholic beverages does not offer consumers net health benefits. For some consumers, research has shown reduction in risk for a narrow range of health conditions. **In general, consumption of alcoholic beverages increases the risk of adverse health consequences.** The risk can be minimized if consumers, who drink, do so in moderation in accordance with NIAAA and US Dietary Guidelines recommendations.

- 3) References to "Moderate consumption" tends to mislead unless specific information on serving size and gender differences are specified. [US Dietary Guidelines defines moderate wine consumption for women as 1 drink = 5 ounces of wine] In general, consumers of alcoholic beverages define "moderation" based upon personal consumption patterns rather than public health guidelines. However, even if moderation were fully defined, label statements about "health effects" or encouragement to seek physician advice would have to be carefully reviewed.
- 4) Congress has specified the scope of a health warning for all alcoholic beverages. Additions to the product label should, as a matter of public health, be scrutinized to assure they do not -- by design or effect -- diminish the cautionary value of the current warning. In 1996, representatives of the Wine Institute stated: "The proposed label statement is an attempt to provide more balanced information to the consumer than now exists with the government warning....."
HHS believes the Wine Institute proposal is neither balanced nor
informative.
- 5) HHS has not encouraged dissemination of the US Dietary Guidelines through product labels. In fact, there is little in the current dietary guidelines that would inform a consumer about the nutritional role of alcoholic beverages in the diet. In fact, the US dietary guidelines do not recommend the inclusion of alcoholic beverages in the American diet.

very true.