



August 15, 2025

Ms. Amy Greenberg
Director, Regulations and Rulings Division
Alcohol and Tobacco Tax and Trade Bureau
1310 G Street, NW, Box 12
Washington, DC 20005

RE: Docket No. TTB 2025-0002; Notice 237: Alcohol Facts Statements in the Labeling of Wines, Distilled Spirits, and Malt Beverages

Dear Ms. Greenberg,

The American Cider Association (ACA) appreciates the opportunity to submit comments on the proposed rulemaking regarding mandatory nutritional, allergen, and ingredient labeling for alcohol beverages. Our association represents more than 1,200 cider and perry producers across the United States—from orchard-based family operations to regional brands selling across multiple states. While our members vary in size and structure, they are unified by their commitment to transparency, craftsmanship, and agricultural tradition.

We support the Alcohol and Tobacco Tax and Trade Bureau's (TTB) goal of modernizing beverage alcohol labeling to ensure consumers have clear, consistent access to information about what they're drinking. However, we respectfully urge the TTB to consider the operational impact of these changes on small and agricultural-based producers—particularly those in the cider sector.

Nutritional Labeling Requirements

The proposed nutritional labeling requirement presents one of the most significant challenges for small cideries—many of which are closely tied to local agriculture and farm-based production. Cider makers often rely on fruit grown on their own farms or purchased from nearby orchards, supporting agricultural diversity and rural economies. Many producers do not have access to in-house laboratories and would be required to send each product—or in many cases, each vintage or seasonal batch—out for expensive third-party testing. This would be cost prohibitive for many and could discourage the use of varied, seasonal fruit that reflects annual harvest conditions.

We strongly encourage the TTB to adopt a tiered approach to nutritional labeling, including:

- **Exemptions or simplified compliance pathways** for producers under a defined annual production threshold, similar to the FDA's model for small food manufacturers.
- The option to provide **average or representative nutritional values** rather than batch-specific data.
- **Permission to disclose nutritional information digitally via QR code** — a system that is already accepted under the European Union's labeling requirements. This approach would promote international regulatory alignment, minimize packaging changes, and allow consumers ready access to accurate product information without imposing undue cost or operational burdens on producers. For limited-release, non-packaged, or taproom-only products, QR codes would allow minimal testing requirements while still meeting transparency goals.

Without such accommodations, the cost and logistical burden of compliance could significantly affect the smallest and most innovative segments of the cider industry—many of which are rooted in agriculture and depend on flexibility to highlight the diversity of fruit from year to year.

Label Flexibility for Small-Batch and Direct-to-Consumer Products

Innovation is a hallmark of the craft cider movement. Many of our members release limited-edition blends, experimental fermentations, or single-varietal ciders in small volumes—sometimes only a few kegs or cases. These products are often sold directly to consumers and are not distributed through traditional retail channels.

For these types of products, we ask the TTB to allow more flexible labeling options, including:

- **Universal batch-level nutritional and allergen disclosures available on-premise or online.**
- **Expanded use of QR codes** to communicate required information without relabeling every SKU.

Implementation Timeline and Industry Support

Should these proposed labeling changes be adopted, it is critical that cideries—especially those with limited staffing and infrastructure—are given sufficient time and support to comply. We support the phased rollout of the final rule, with five years of lead time for producers to comply.

In addition, we recommend:

- Development of **technical guidance materials**, including sample label formats and FAQs.
- A TTB-led **educational campaign**, with webinars and virtual office hours targeted at small producers, including cideries and meaderies.

These resources would help ensure that the final rule is not only effective, but also achievable.

Conclusion

We support the TTB's goal of creating a more transparent and consumer-friendly labeling system across all alcohol categories. At the same time, we believe it is essential to preserve the diversity and accessibility of our industry, which includes many small, regional, and agricultural producers who will be disproportionately affected by these changes.

With thoughtful modifications, this rule can accomplish both goals—empowering consumers and supporting the sustainability of small producers. We appreciate the opportunity to share our perspective and look forward to working with the TTB as this rulemaking process continues.

Sincerely,

Monica Cohen, CEO

American Cider Association