



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 2025-0004; Notice 238: Major Food Allergen Labeling for Wines, Distilled Spirits, and Malt Beverages

Dear Ms. Greenberg,

The American Cider Association (ACA) appreciates the opportunity to provide comments on the Alcohol and Tobacco Tax and Trade Bureau's (TTB) proposed rulemaking regarding mandatory allergen labeling for alcohol beverages (Notice No. 238). The ACA represents more than 1,200 cider and perry producers nationwide, from small orchard-based family operations to regional brands distributing across multiple states. While our members vary in scale and business model, they share a commitment to transparency, quality, and agricultural tradition.

We support the TTB's goal of ensuring consumers have accurate and consistent access to information about the presence of major food allergens in beverage alcohol products. We agree that clear labeling can help protect public health and build consumer confidence. However, we respectfully urge the Bureau to consider the operational realities of small, agricultural-based producers and to structure the rule in a way that delivers transparency without creating unintended burdens or confusion.

Distinguishing Ingredients from Processing Aids

We urge TTB to clearly differentiate between ingredients that remain present in the finished product and processing aids that are fully removed prior to packaging. For example, certain fining agents or fermentation aids—some of which may be derived from major allergen sources—are used temporarily during production but are filtered or racked out before bottling. In such cases, no detectable protein from the allergen source remains in the finished beverage.

Mandating allergen declarations for such non-residual processing aids could cause unnecessary consumer alarm and potentially misrepresent the safety of the product. This approach would also be inconsistent with allergen-labeling practices in other food and beverage sectors, which typically focus on the presence of allergens in the final, consumable product.

Guidance for Fermented Beverage Producers

The ACA recommends that TTB develop a clear, practical allergen reference guide tailored to fermented products such as cider, wine, and mead. This guide should:

- Clearly define “used in production” versus “present in the finished product.”
- Provide examples of common cider- and wine-making inputs and whether they require allergen declaration.
- Include testing thresholds or detection methods that can be used to verify the absence of allergens in finished products.

Such a guide would help ensure accuracy and consistency in labeling, reduce the risk of over- or under-disclosure, and help small producers navigate compliance without costly guesswork or unnecessary relabeling.

Implementation Considerations

Should the allergen labeling requirement be adopted, it is important that producers—especially small operations with limited staff and resources—be given sufficient lead time to update their labels and production protocols. We recommend a **phased implementation period of at least three years**, along with technical assistance in the form of sample label formats, FAQs, and virtual office hours with TTB specialists.

Conclusion

The American Cider Association supports the TTB’s intent to modernize labeling in a way that benefits consumers and promotes transparency. By focusing on allergens present in the finished product, providing clear industry-specific guidance, and allowing

reasonable implementation timelines, the Bureau can achieve these goals while preserving the diversity and vitality of small-scale and agricultural-based beverage alcohol producers.

We appreciate the opportunity to provide input on this important rulemaking and look forward to continued engagement with the TTB as the process moves forward.

Sincerely,

Monica Cohen

CEO

American Cider Association

monica@ciderassociation.org