

DEPARTMENT OF THE TREASURY

ALCOHOL AND TOBACCO TAX AND TRADE BUREAU

Supporting Statement -- Information Collection Request

OMB Control Number 1513-0084

Labeling of Sulfites in Alcohol Beverages

Changes Since Last Approval

Changes made to the Supporting Statement since this information collection's last approval:

- In Question 8, TTB is updating the 60-day notice publication information for this information collection.
- In Question 12, TTB is revising the estimated annual respondent burden and labor costs associated with this information collection.
- In Question 15, TTB notes the burden adjustments made to this information collection.

A. Justification

1. What are the circumstances that make this collection of information necessary, and what legal or administrative requirements necessitate the collection? Also align the information collection to TTB's Line of Business/Sub-function and IT Investment, if one is used.

The Food and Drug Administration (FDA) has determined that sulfating agents can cause allergic reactions in humans, and, as such, the presence of sulfites in food may have serious health consequences for persons who are intolerant of sulfites, particularly asthmatics. To enable such persons to minimize their exposure to sulfites, the FDA regulations at 21 CFR 101.100(a)(4) require food labels to disclose the presence of sulfites if there are 10 parts per million or more of a sulfating agent in a finished product.

The Federal Alcohol Administration Act (FAA Act), 27 U.S.C. 205(e), directs the Secretary of the Treasury (the Secretary) to issue regulations that will provide consumers with "adequate information" as to the identity and quality of alcohol beverages. The Alcohol and Tobacco Tax and Trade Bureau (TTB) administers the FAA Act pursuant to section 1111(d) of the Homeland Security Act of 2002, as codified at 6 U.S.C. 531(d). In addition, the Secretary has delegated certain administrative and enforcement authorities to TTB through Treasury Order 120-01.

Under TTB's authority under the FAA Act, and consistent with FDA determinations and regulations, TTB has prescribed sulfite disclosure requirements in its alcohol beverage labeling regulations at 27 CFR 4.32(e) for wine, 5.63(c)(7) for distilled spirits, and 7.63(b)(3) for malt beverages. Those regulations require alcohol beverage labels to disclose the

presence of sulfites in the labeled product if it contains 10 parts per million or more of a sulfating agent.

This information collection is aligned with Line of Business/Sub-function: Health / Consumer Health and Safety.

2. How, by whom, and for what purpose is this information used?

Sulfating agents can cause allergic responses in humans and, as such, their presence in food and beverages may have serious health consequences for persons who are intolerant of sulfites, particularly asthmatics. Persons who are or may be intolerant of sulfites use the mandated alcohol beverage label disclosure regarding the presence of sulfites to avoid consuming such products.

3. To what extent does this collection of information involve the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology? What consideration is given to use information technology to reduce burden?

TTB believes that information technology is not a suitable means for reducing burden as this information collection is a third-party disclosure that must appear on the labels of alcohol beverage products.

4. What efforts are used to identify duplication? Can similar information already available be used or modified for use for the purposes described in Item 2 above?

Efforts to identify duplication are not applicable to the collection of information for the purpose of disclosures of product information to the general public through labeling or advertising.

5. If this collection of information impacts small businesses or other small entities, what methods are used to minimize burden?

All bottlers and importers, regardless of size, are required to disclose the presence of sulfites in alcohol beverages. Because this label disclosure is necessary for consumer protection, this third-party information collection's burden cannot be reduced based on the size of the respondent's business.

6. What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?

Respondents complete this information collection only as necessary to comply with the TTB regulations requiring a declaration of sulfites on alcohol beverage labels. If TTB did not require this disclosure, consumers sensitive to sulfites would not be aware of their presence in alcohol beverage products that they might consume.

7. Are there any special circumstances associated with this information collection that would require it to be conducted in a manner inconsistent with OMB guidelines? (See 5 CFR 1320.5(d)(2).)

There are no special circumstances associated with this information collection that would require it to be inconsistent with OMB guidelines.

8. *What effort was made to notify the general public about this collection of information? Summarize the public comments that were received and describe the action taken by the agency in response to those comments.*

To solicit comments from the general public, TTB published a “60-day” comment request notice for this information collection in the Federal Register on January 30, 2026, at 91 FR 4180. TTB received no comments on this information collection in response.

9. *Was any payment or gift given to respondents, other than remuneration of contractors or grantees? If so, why?*

No payment or gift is associated with this information collection.

10. *What assurance of confidentiality was provided to respondents, and what was the basis for the assurance in statute, regulations, or agency policy?*

Assurances of confidentiality are not applicable for this third-party disclosure made to the public on the labels of alcohol beverage products.

11. *What is the justification for questions of a sensitive nature? If personally identifiable information (PII) is being collected in an electronic system, identify the Privacy Impact Assessment (PIA) that has been conducted for the information collected under this request and/or the Privacy Act System of Records notice (SORN) issued for the electronic system in which the PII is being stored.*

This information collection contains no questions of a sensitive nature. In addition, this collection is a third-party disclosure concerning the presence of sulfites in alcohol beverages made on product labels, and, as such, it does not collect personally identifiable information (PII) in an electronic system. Therefore, no Privacy and Civil Liberties Impact Assessment (PCLIA) or System of Records Notice (SORN) is required for this collection.

12. *What is the estimated hour burden of this collection of information?*

Estimated Burden Hours: For this third-party disclosure of information, TTB estimates that there are 74,100 annual respondents,¹ each making 1 response per year, for a total of 74,100 responses. TTB further estimates that each response requires 40 minutes, for an estimated total annual burden of 49,400 hours.

Estimated Respondent Labor Costs: Based on the average fully-loaded labor rate of \$52.40 per hour for compliance officers employed in the beverage manufacturing industry, TTB estimates the per-respondent and total respondent labor costs for this information collection as follows:²

¹ TTB has determined the affected respondents represent a portion of all alcohol beverage permittees, as follows: 1% of Distilled Spirits Plants, 5% of Brewers, 80% of Alcohol Beverage Importers, and 100% of Bonded Wineries.

Respondent Labor Costs for OMB No. 1513–0084 (Beverage Industry Compliance Officers Average Fully-Loaded Labor Rate = \$45.24/hour*)					
Avg. Time / Response	Fully-loaded Labor Rate / Response	Responses / Respondent	Labor Costs / Respondent	Total Respondents	Total Labor Costs
40 minutes	\$34.93	1	\$34.93	74,100	\$2,588,313.00

* The fully-loaded labor rates and respondent labor costs are rounded to the nearest whole cent.

Respondent Record Retention: The TTB regulations do not specify a recordkeeping requirement for this information collection.

13. *What is the estimated annual cost burden to respondents or record keepers resulting from this information collection request (excluding the value of the hour burden in Question 12 above)?*

There are no additional costs to respondents associated with this information collection since the presence of added sulfites in an alcohol beverage product is known to its producer and product testing for potential allergens is a usual and customary business practice.

14. *What is the annualized cost to the Federal Government?*

As a third-party disclosure made to the public on alcohol beverage labels by industry members, there is no cost to the Federal Government associated with this information collection.

15. *What is the reason for any program changes or adjustments reported?*

There are no program changes associated with this information collection at this time, and TTB is submitting it for extension purposes only. As for adjustments, due to changes in agency estimates resulting from alcohol industry growth and enhanced data collection, TTB is increasing the number of annual respondents and responses to this information collection from 30,570 to 74,100 each and is increasing this collection’s annual burden hour estimate from 20,380 to 49,400. The number of annual responses per respondent, one, and the burden estimate per-response, 40 minutes, remain the same as previously reported.

16. *Outline plans for tabulation and publication for collections of information whose results will be published.*

TTB does not publish the results of this information collection, which is a third-party disclosure made to the public by respondents on alcohol beverage labels.

² Private Sector Fully-loaded Labor Rate = Hourly wage rate x 1.44 to account for employee benefit costs. Per the most recent U.S. Department of Labor, Bureau of Labor Statistics, data for National Industry-Specific Occupational Employment and Wage Estimates for NAICS 312100—Beverage Manufacturing, the mean hourly wage for Compliance Officers (13–1041) is \$36.39/hour, which results in a fully-loaded labor rate of \$52.40/hour (rounded to the nearest cent). See <https://data.bls.gov/oes/#/industry/312100>.

17. If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?

This information collection is a third-party disclosure made to the public on the labels of alcohol beverages that contain sulfating agents at 10 parts per million or more. As such, there is no prescribed TTB form for this collection or other medium on which TTB can display this information collection's expiration date.

18. *What are the exceptions to the certification statement?*

- (c) See item 5 above.
- (f) This is not a recordkeeping requirement.
- (i) No statistics are involved.
- (j) See item 3 above.

B. Collections of Information Employing Statistical Methods.

This information collection does not employ statistical methods.