



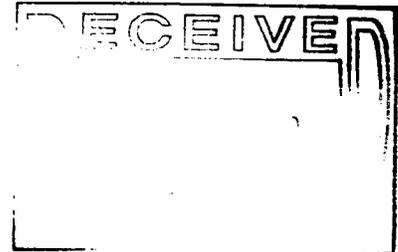
VINIFERA WINE GROWERS ASSOCIATION

P.O. Box 10045

Alexandria, Virginia 22310

February 11, 1999

Dr. Larry Hart
Board Executive Secretary
National Toxicology Program
111 T.W. Alexander Drive
Building 101, North Campus
Research Triangle Park, N.C. 27709



Dear Dr. Hart:

This is a letter of grave concern and strong opposition regarding the reported plans of the National Toxicology Program (NTP) to list alcohol beverage consumption, which would include all distilled spirits, beer and wine products, as being a "known human carcinogen."

From the beginning of written history about the social, cultural and medical development of Western civilization, alcohol beverages have been recognized for their known and potential health benefits.

More recently, particularly following the attention the international media gave the findings of the "French Paradox," there has been a predominance of published medical research discussing moderate consumption, as part of a healthy life style, and its relationship to cardiovascular and general well-being.

In the case of the U.S. wine industry, which is represented by wineries and wine businesses in all 50 states, and which provides jobs, both direct and indirect, to some 556,000 Americans who are paid nearly \$12.8 billion in annual wages and who pay some \$3.3 billion in state and local taxes, and which generates overall an estimated \$45.6 billion of the nation's Gross Domestic Product, the listing of alcohol beverages as a "known human carcinogen" would result in economic disaster for the wine, as well as other sectors of the alcohol beverage industry.

Such a decision would have both national and international repercussions. Without a massive amount of sustainable medical research to back up such a decision, acceptable by the international medical community, it would be irresponsible for the NTP to make such a recommendation to the Secretary of HHS. An action, if taken, would, I am sure, not hold up in the inevitable court challenges that would follow.

Also, if the NTP were to make such a recommendation, it would fly in the face of what the government has already done to recognize the potential health benefits of moderate wine consumption in the most recent updated issuance of the nation's Dietary Guidelines, and

this month's approval by the Bureau of Alcohol, Tobacco and Firearms of the following voluntary statement which can appear on all U.S. wine labels: "To learn the health benefits of moderate wine consumption, write for the federal government's Dietary Guidelines for Americans: National Health Information Center, P. O. Box 1133, Washington, D.C. 20013."

Clearly, any such negative recommendation by the NTP would set a dangerous precedent of targeting a specific beverage product line which could, in effect, open up all foodstuff products to such review.

Further, such an action does not seem to be within the primary functions of the NTP to identify and review hazards in the workplace. There are already numerous other federal agencies that have degrees of oversight for the U.S. alcohol beverage industry, including the BATF, FDA, FTC, FCC, EPA, USDA, and the Congress.

While you and your colleagues are familiar with the most current medical and historical research supporting the moderate consumption of wine as part of a healthy life style, I will mail, under separate cover, copies of two recent issues of my association's *Wine Exchange* newsletter that featured a review of studies on the use of wine in medical practice, nutrition and health originally published in the 1970s, as well as a series of articles on the history of wine in the civilized world.

As we celebrate President's Day, I leave you with the words of our nation's father of viticulture and enology, Mr. Thomas Jefferson, "Wine from long habit has become an indispensable for my health." If he could address your group, I am sure you would be persuaded not to make any unfounded or counterproductive recommendations.

Of the hundreds of members of the industry's organizations which I represent, our message to the NTP is that, as a large body of tax paying-citizens, we hope the NTP will not be influenced into making any recommendations that are not truly in the best interest of the American people.

Sincerely,



Gordon W. Murchie

President

Vinifera Wine Growers Association;

Executive Director

Licensed Beverage Information Council;

Legislative Chairman

World Association of The Alcohol Beverage Industries