



July 19, 2024

Mr. Robert Vincent
SAMHSA Reports Clearance Officer
Center for Behaviors Quality and Statistics
Substance Abuse and Mental Health Services Administration
5600 Fishers Lane – Room 15E45
Rockville, Maryland 20857

RE: Extension Request - Public Comment on ICCPUD Study on Alcohol Intake and Health Methodology

Dear Mr. Vincent:

Wine Institute is the public policy advocacy association representing over one thousand California wineries and affiliated businesses responsible for eighty-one percent of the nation's wine production and more than ninety-five percent of U.S. wine exports. **We respectfully request a 60-day extension to the current comment period for *Federal Register* Docket 2024-14650** entitled The Interagency Coordination Committee on the Prevention of Underage Drinking ("ICCPUD") Requests for Public Comments. Our request for an additional 60 days would extend the comment period until October 2. As we explain below, there are at least four important reasons to provide a 60-day extension.

First, an extension is necessary to ensure opportunity for meaningful analysis and more complete comments on this complex matter and the questions that ICCPUD raises in the notice. According to the notice, ICCPUD seeks comment on "Alcohol Intake and Health methodology developed for performing a series of studies assessing the relationship between alcohol intake and related health conditions." The methodology is set forth in a 37-page document entitled *Scientific Methodology Protocol for Public Comment Alcohol Intake and Health Study* which first became available on ICCPUD's website approximately the same day it published the notice. The notice includes several tables, complex formulas, citations and references to scientific publications, and appendices. The notice poses a series of 10 questions about that document. This undertaking requires more than 30 days' time for thoughtful analysis and comments.

Second, an extension is necessary given the importance of the issue and its potential impact. ICCPUD’s Alcohol Intake and Health study and methodology is of critical importance for the wine industry and has far-reaching consequences for winemakers, and related industries including agriculture, hospitality, and tourism. It is critical that all stakeholders are fully aware of the process’s implications and have sufficient time to develop comments. Trade associations need time to collect, deliberate, and convey the collective input of all members and to ensure meaningful and comprehensive responses. This is especially important given the statutory mandate that ICCPUD “shall actively seek the input of and shall consult with all appropriate and interested parties, including ... alcohol beverage industry trade associations and companies.”¹

Third, an extension is necessary to provide fairness for those who plan to submit comments since ICCPUD itself took longer than expected with this methodology and process. At an open meeting with the National Academies of Sciences, Engineering, and Medicine Committee to Review of Evidence on Alcohol and Health (“NASEM Committee”), Mr. Vincent told the NASEM Committee that ICCPUD’s scientific review panel—who were not publicly disclosed until April 12—should have its final methodology “within the next week or so”² and it anticipated holding a public meeting on that methodology “sometime in the spring.”³ That did not happen. Instead, the Department of Health and Human Services and ICCPUD published a notice for public comment in the *Federal Register* on July 3, 2024, with a brief 30-day comment period. Those who desire to submit comments deserve equal opportunity to adjust the initial deadlines to ensure sufficient time for thoughtful deliberation and comments.

Fourth, an extension is necessary considering the timing of the notice publication (i.e., one day before the Independence holiday) and the initial 30-day comment period. In addition to the Independence Day holiday—which was one day after the notice published—summer marks a critical time for wineries of all sizes as they respond to extreme heat, droughts, wildfires, and approach or begin their harvest season. For example, according to California’s Department of Forestry and Fire Protection, there have been at least 94 reported wildfire incidents in California since July 3, 2024.⁴ California wineries and others in the sector must balance these competing priorities—including reviewing ICCPUD’s notice and related documents, analyzing the issues, and providing input—with sometimes limited resources and must have reasonable time to do so.

For the reasons stated above, a 60-day extension is appropriate and necessary.


¹ See 42 U.S.C.S. § 290bb-25b(c)(1)(E).

² See Review of Evidence on Alcohol and Health (Meeting 1B - Open and Closed) transcript at 50:11, available at https://www.nationalacademies.org/event/41857_01-2024_review-of-evidence-on-alcohol-and-health-meeting-1b-open-and-closed.

³ *Id.* at 50:29.

⁴ See California’s Department of Forestry and Fire Protection, 2024 Incident Archive, available at <https://www.fire.ca.gov/incidents/2024>.

Sincerely,

A handwritten signature in black ink, appearing to be 'B. Koch', with a large, sweeping initial 'B' and a long, horizontal flourish extending to the right.

Bobby Koch
President and CEO

CC: RDML Paul Reed, MD, Deputy Assistant Secretary for Health