



July 7, 2023

Ms. Amy Greenburg, Director  
Regulation and Rulings Division  
Alcohol and Tobacco Tax and Trade Bureau  
1310 G St. NW, Box 12  
Washington, D.C. 20005

RE: Docket TTB-20022-0011

Dear Director Greenburg:

Georgia Alcohol Policy Alliance appreciates the opportunity to provide input on the Department of the Treasury's Alcohol, Tobacco, Tax and Trade Bureau on trade practices: Consideration of Updates to Trade Practice Regulations (Notice No. 216). These practices are foundational in preventing excessive alcohol use, protecting public health, and bolstering economic concerns such as workplace productivity, and limiting health care costs.

In Georgia alone, excessive alcohol use costs our state \$6.9 billion per year, largely in lost workplace productivity, healthcare expenses, criminal justice costs and motor vehicle crashes.<sup>1</sup> More than 3,900 Georgians die annually from excessive alcohol use<sup>2</sup>; for perspective this is a number that even exceeds the current number of people who lose their lives to drug overdoses. 1 out of 7 Georgia adults binge drink, meaning more than 4 drinks at a sitting for women, 5 for men.<sup>3</sup> And 59.5% of high school students who drink, binge drink.<sup>4</sup>

Georgia Alcohol Policy Alliance finds the following issues to be critical trade practice considerations:

1. **The three-tier system has proven to be an enduring, effective control system** for a product that is intoxicating, addicting and carcinogenic. It should remain intact and strong.
2. **State and local law enforcement need support identifying and controlling trade practice violations.** Please commit more resources to training and supporting state and local law enforcement, including alcohol regulatory investigators such as the Georgia Department of Revenue Alcohol Division.
3. **Do not further enable nationwide online alcohol sales**, via the digital marketplace. Given economies of scale and boundary-less distribution, such sales have significant drawbacks. They overpower home rule (for communities that want to provide additional limits to alcohol access), enable underage drinking, hurt local alcohol retailers, and can drive heavier drinking overall.<sup>5</sup>

Humbly submitted,



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Board Chair, Georgia Alcohol Policy Alliance  
[www.GaAlcoholPolicy.org](http://www.GaAlcoholPolicy.org)

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<sup>1</sup> - "Excessive Drinking is Draining the U.S. Economy"; Centers for Disease Control and Prevention;  
<https://www.cdc.gov/alcohol/features/excessive-drinking.html>

<sup>2</sup> - "Alcohol and Public Health: Alcohol-Related Disease Impact (ARDI)"; Centers for Disease Control and Prevention, <https://nccd.cdc.gov/DPH/ARDI/default/default.aspx>

<sup>3</sup> - "Chronic Disease Indicators", Centers for Disease Control and Prevention, <https://www.cdc.gov/cdi/>

<sup>4</sup> - "Survey Results." Georgia Department of Education; <https://www.gadoe.org/wholechild/GSHS-II/Pages/GSHS-Results.aspx>

<sup>5</sup> - "Online alcohol delivery is associated with heavier drinking during the first New Zealand COVID-19 pandemic restrictions", National Library of Medicine;  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7753625/#:~:text=Purchasing%20online%20alcohol%20delivery%20during,25%20reported%20no%20age%20checks>