



April 28, 2022

David Wulf
Deputy Administrator
Tax and Trade Bureau
1310 G Street, N.W., Box 12
Washington, DC 20005

Re: RIN 1513-AC88: Addition of American Single Malt Whisky to the Standards of Identity for Distilled Spirits

Dear Deputy Administrator Wulf:

On behalf of the Distilled Spirits Council of the United States (DISCUS) and the American Single Malt Whiskey Commission (ASMWC), a national association representing nearly 100 producers of American Single Malt Whiskey across the United States, we are writing to respectfully urge the timely release of the Bureau's "Addition of American Single Malt Whisky to the Standards of Identity for Distilled Spirits" notice of proposed rulemaking.

We again would like to commend TTB for listening to the industry and placing a rulemaking regarding an American Single Malt Whisk(e)y Standard of Identity on its Semi-Annual Regulatory Agenda. However, the need for the development of a standard for this growing category has reached a critical moment as more distillers than ever are labeling their products with this term while there are no formal TTB requirements for the American Single Malt Whisk(e)y category.

We believe that by securing a formal Standard of Identity, consumers will benefit from the clear definition of what constitutes a single malt whisk(e)y produced in the U.S. This new standard will establish trust in the category, clarify label declarations, and equip consumers with the necessary information to make informed purchasing decisions.

The formal establishment of this category would also signal to the world that not only do we believe in and support our own distilleries, but we also recognize that American Single Malt Whisk(e)y is as unique as other American staples, such as Bourbon, and deserves to be similarly defined and protected. These protections have been in place for Scotch Whisk(e)y for generations and we believe that, to protect the developing American Single Malt category here in the U.S., such regulations should be in place here as well. As DISCUS, ASMWC, and others seek to promote the protection of this category through free trade agreements with nations around the world, having an established definition in the U.S. will set a critical marker down to assist in the development of greater international recognition and protection going forward.

Mr. David Wulf

April 28, 2022

Page 2

We look forward to working with the Bureau in this important matter. Please do not hesitate to contact us if we can be of any assistance through this process. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Swonger".

Chris Swonger
President and CEO
Distilled Spirits Council of the U.S.

A handwritten signature in cursive script, appearing to read "Steve Hawley".

Steve Hawley
President
American Single Malt Whiskey Commission

cc: Mary Ryan
Administrator
Tax and Trade Bureau