



Consumer Federation of America



December 18, 2013

BY ELECTRONIC MAIL

Ms. Collette I. Rihane, M.S., R.D.
Co-Executive Secretary and Designated
Federal Officer, DGAC
Center for Nutrition Policy and Promotion
U.S. Department of Agriculture
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Re: 2015 *Dietary Guidelines*

Dear Ms. Rihane:

The Consumer Federation of America (CFA)¹ and the National Consumers League (NCL)² are pleased to submit the following comments to the 2015 Dietary Guidelines Advisory Committee (DGAC).

The *Dietary Guidelines* are an important tool to help promote health and prevent disease among consumers. The *Dietary Guidelines* also serve as the basis for nutrition information by federal and state agencies across the country.

These comments will focus specifically on alcohol. We agree that alcohol is a unique part of the diet that should continue to have a separate guideline devoted to its responsible consumption. We support retaining the current recommendation of moderate consumption (*i.e.*, that those who choose to drink should do so in moderation) and the current definition of an alcoholic beverage, *i.e.*, a “standard drink.”

¹ CFA is an association of nearly 300 nonprofit consumer organizations that was founded in 1968 to advance the consumer interest through research, advocacy and education. Member organizations include local, state, and national consumer advocacy groups, senior citizen associations, consumer cooperatives, trade unions and anti-hunger and food safety organizations.

² Founded in 1899, the National Consumers League is America’s pioneer consumer organization. Its mission is to protect and promote social and economic justice for consumers and workers in the United States and abroad. NCL is a private, nonprofit membership organization. For more information, visit www.nclnet.org.

Definition of a Standard Drink Should be Included in the 2015 Dietary Guidelines

We strongly urge the DGAC to continue to define a “standard drink” as having 0.6 fluid ounces of alcohol. A standard drink reflects the fact that typical servings of beer, wine, and distilled spirits contain roughly the same amount of pure alcohol: 0.6 fl oz. A standard 12 fl oz bottle or can of 5%-alcohol beer, a 5 fl oz glass of 12%-alcohol wine, and a 1.5 fl oz shot of 80-proof distilled spirits each contains this amount of alcohol.

While it is true that consumers do not always consume alcohol in these precise amounts, the concept of a standard drink provides consumers with an important reference point similar to serving size information on packaged food labels. The definition of a standard drink also provides context for the *Dietary Guideline’s* recommendations that consumers should limit their consumption of alcoholic beverages to one to two drinks a day. Without defining a standard drink, that important advice becomes meaningless. Moreover, virtually all federal and state government recommendations and warnings about alcohol consumption are worded in terms of number of standard drinks.³ All such advice is of little value if consumers have no idea what a drink is.

We appreciate the inclusion of the percent alcohol in standard servings of the most common alcoholic beverages in the definition of a standard alcoholic drink. A thorough explanation of these statistics aids consumers in applying the *Dietary Guidelines* recommendations to non-standard alcoholic beverages and non-standard containers. The explicit definition of a standard drink is necessary to help educate the American public about responsible alcohol consumption.

We also appreciate that the definition of an alcoholic drink was highlighted in the 2010 *Dietary Guidelines* in a separate text box, causing it to stand out. It is very helpful that the definition of an alcoholic drink is listed directly below the Key Recommendations in Chapter 3 as well.⁴ The *Dietary Guidelines* should also list and define a standard drink in the glossary as well as other places in the *Dietary Guidelines* wherever the Committee’s recommendations on alcohol consumption are listed.

We also strongly urge the *Dietary Guidelines* to include graphic depictions showing the equivalent of a standard drink for different types of alcoholic beverages. We have included one example in Appendix A of these comments. The National Institute on Alcohol Abuse and Alcoholism’s 2005 edition of *Helping Patients Who Drink Too Much: A Physician’s Guide* also has an excellent example of a graphic chart illustrating U.S. standard drink equivalents.⁵ A similar depiction in the *Dietary Guidelines* would provide

³ For example: FDA warning on labels of over-the-counter painkillers (“Alcohol Warning: If you consume 3 or more alcoholic drinks every day, ask your health professional whether you should take acetaminophen or other pain relievers/fever reducers. Acetaminophen may cause liver damage.”); advice about drinking and driving in most state drivers license manuals; National Institute on Alcohol Abuse and Alcoholism, *Helping Patients Who Drink Too Much: A Physician’s Guide* (2005).

⁴ *Dietary Guidelines for Americans*, 2010, p. 21.

⁵ National Institute on Alcohol Abuse and Alcoholism, *Helping Patients Who Drink Too Much: A Physician’s Guide* (2005), page 24.

consumers with a visual understanding of a standard drink and further enhance the usefulness of the *Dietary Guidelines* recommendations regarding alcohol consumption.

The 2010 *Dietary Guidelines* neglected to include a table from the 2005 version illustrating calories in selected alcoholic beverages. This table was a very helpful tool for consumers as it provided calorie counts for beer (both regular and “lite”), red and white wine, dessert wine, and 80-proof distilled spirits. It would be pertinent and helpful to also include calorie information for increasingly popular non-standard alcoholic beverages (e.g., alcoholic energy drinks, sweet liquor products, and mixed drinks that contain multiple sources of alcohol). This table should also make clear that for mixed drinks, additional calories come from the mixers and that there are lower calorie alternatives. Given the fact that labels on alcoholic beverages, with the exception of “lite” beers, are not required to list calories, the table provided valuable information to consumers and should be expanded to include a greater variety of products in the 2015 *Dietary Guidelines*.

Improving Labeling of Alcoholic Beverages

We understand that USDA and HHS do not have jurisdiction over alcoholic beverage labeling. However, we ask that these agencies be mindful of long-standing efforts by consumer and public health groups to reform alcohol labeling at the Alcohol and Tobacco Tax and Trade Bureau (TTB). A signal of support from USDA and HHS would be helpful in efforts to provide consumers with information on alcoholic beverage labels about alcohol content, calories and carbohydrates. Alcoholic beverages are the only major source of calories in the American diet that are not required to be labeled with the basic information needed to follow the *Dietary Guidelines*, and this is a significant omission in the effort to fight obesity. According to the NHANES study included in the *Dietary Guidelines for Americans 2010*, the fifth largest source of calories for Americans 19 and older was alcoholic beverages.^{6 7}

The current labeling requirements for alcoholic beverages are inadequate. Distilled spirits and many wines are currently required to provide alcohol information in terms of percent alcohol or alcohol by volume (ABV) or proof, but most malt beverages are not. No other information about alcohol content is required for any product type. With the exception of “lite” beers, no alcoholic beverages are required to be labeled with calorie information. Thus, most alcoholic beverage labels are not required to provide the information an individual would need to follow the *Dietary Guidelines*’ recommendations on moderate consumption of alcohol and calories. Recent action by the TTB in May 2013 to allow voluntary serving facts statements on alcoholic beverages

⁶ *Dietary Guidelines for Americans*, 2010, p. 12.

⁷ The 2010 DGAC report states “consumption of alcoholic beverages also contributes to calories (7 kcal/g), from the alcohol itself as well as accompanying mixers (e.g., soda, juice or sweetened mixer).... so careful attention to portion size is important for alcoholic beverages.” Report at B2-9. One of the report’s major conclusions is that alcohol consumption “beyond an average of two drinks a day may lead to weight gain.” Report at E1-25.

is a good step but ultimately TTB should require all alcoholic beverages to carry standardized serving facts labels.

The Nutrition Facts panel on other food and beverage products is obviously an essential tool for consumers who wish to follow the *Dietary Guidelines* recommendations. It should be equally obvious that improved labeling of alcoholic beverages is needed to enable consumers to follow the *Dietary Guidelines*' advice on alcohol and calorie consumption. To make an educated choice about alcohol consumption, alcohol labels should be required to include the serving size in fluid ounces, the amount of alcohol per serving, the percent alcohol by volume, and calories and carbohydrates per serving. Additionally, alcohol labels should include the definition of a standard drink and how many standard drinks the beverage contains to help consumers apply the *Dietary Guidelines* recommendations.

We appreciate the opportunity to comment on the 2015 *Dietary Guidelines*.

Respectfully submitted,



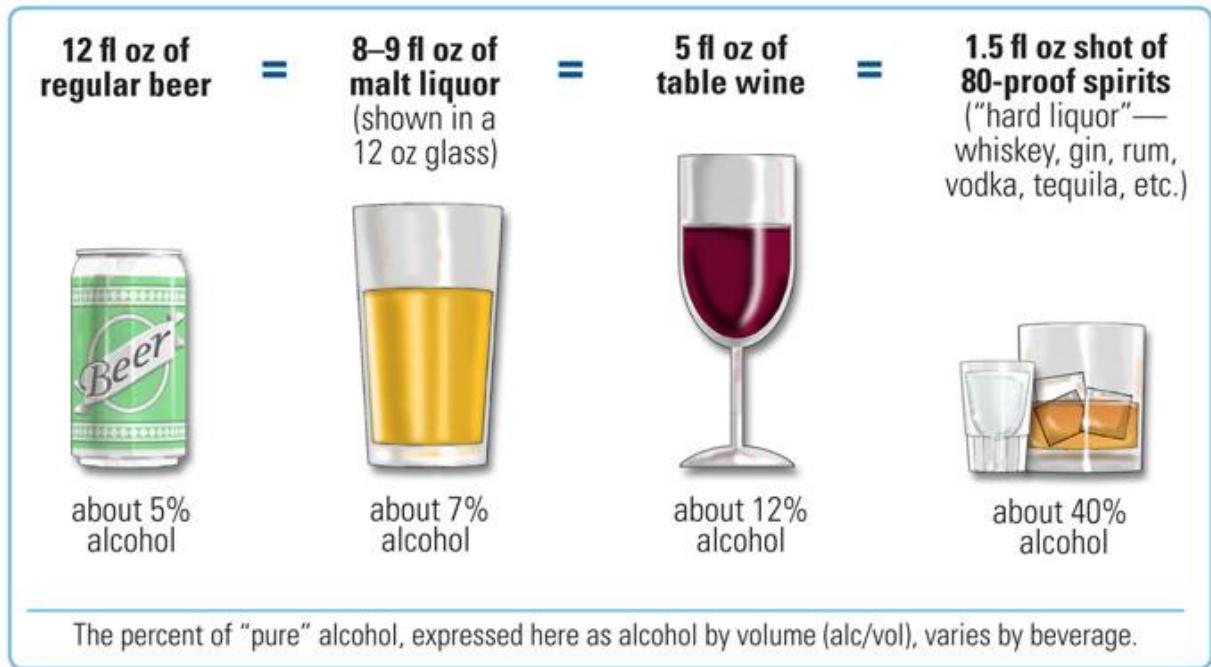
Christopher Waldrop
Director, Food Policy Institute
Consumer Federation of America



Kelsey Albright
Linda Golodner
Food Safety and Nutrition Fellow
National Consumers League

Appendix A

An example of a graphic depiction showing the equivalent of a standard drink for different types of alcoholic beverages.



See also: National Institute on Alcohol Abuse and Alcoholism, *Helping Patients Who Drink Too Much: A Physician's Guide* (2005), page 24.