



July 15, 2010

BY ELECTRONIC MAIL

Ms. Carole Davis
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: 2010 Dietary Guidelines Advisory Committee Report

Dear Ms. Davis:

The Consumer Federation of America (CFA) and the National Consumers League (NCL) are pleased to submit the following comments on the final report of the 2010 Dietary Guidelines Advisory Committee (DGAC).

First, our congratulations to you and the Committee on the tremendous job done by the DGAC and its staff in producing this well-researched report. The *Dietary Guidelines* are now relied upon in a variety of ways that were never anticipated by its creators. With increased attention on obesity, there will be even greater attention to, and reliance on, the *Dietary Guidelines*.

The purpose of this letter is to focus your attention on just one of the guidelines: alcohol. We agree with the DGAC report that the 2010 *Dietary Guidelines for Americans* should continue the current recommendations on alcohol, with a few important modifications. Most important, it is time to finally clarify and educate the American public about the definition of a “standard drink.” This can easily be done by adding the following italicized definition of a “standard drink” in front of the somewhat ambiguous description that currently appears in the alcohol guideline:

A “standard drink” is the amount of an alcoholic beverage that contains 0.6 fluid ounces (fl oz) or 14 grams (g) of pure alcohol. Twelve fluid ounces of regular beer, 5 fluid ounces of wine, or 1.5 fluid ounces of 80-proof distilled spirits count as one standard drink.

Americans must know what a “standard drink” is if they are to follow advice on alcohol consumption that is stated in terms of number of drinks.

We also believe that the U.S. Department of Agriculture (USDA) and the Department of Health and Human Services (HHS) should speak out about the need to improve alcohol beverage labeling. Alcoholic beverages are the only major source of calories in the American diet that are not labeled with the basic information needed to follow the *Dietary Guidelines*, and this is a significant omission in the effort to fight obesity.

The undersigned agree with the DGAC that alcohol is a unique part of the diet that should continue to have a separate guideline devoted to its responsible consumption. We also support retaining the current recommendation of moderate consumption (*i.e.*, that those who choose to drink should do so in moderation) and the use of “standard drink” to measure consumption.

Definition of a “Standard Drink”

In our view, the main weakness of the current alcohol guideline is that it lacks a clear, consumer-friendly definition of a “standard drink.” The 2005 *Dietary Guidelines*’ recommendations on alcohol consumption are phrased in terms of number of drinks per day, but provide only the following cryptic explanation of a “drink”: “Twelve fluid ounces of regular beer, 5 fluid ounces of wine, or 1.5 fluid ounces of 80-proof distilled spirits count as one drink for purposes of explaining moderation.”¹ There is no explanation of how these numbers were arrived at, or how consumers might determine the number of drinks when confronted with non-standard alcoholic beverages or non-standard containers. Not surprisingly, most Americans do not know what a “drink” is. Unfortunately, the DGAC report, while improving the definition, does not fully correct this omission.

We think the definition of a “standard drink” merits greater explanation and emphasis. Without an understanding of what is a “standard drink” is, the *Dietary Guidelines*’ recommendation to limit consumption to one or two drinks a day is meaningless. Moreover, not only the *Dietary Guidelines*, but virtually all federal and state government recommendations and warnings about alcohol consumption are worded in terms of number of standard drinks.² All such advice is of little value if consumers have no idea what a drink is.

¹ *Dietary Guidelines for Americans*, 2005, p. 44.

² See, e.g., 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).

We propose that the definition of a “standard drink” (using the language provided on page 1 of this letter) should appear as a separate paragraph in the text and should also be added to the “key recommendations” section of the alcohol guideline and in the glossary of definitions. We propose using the language on page 1 of this letter, but whatever definition is used should make clear that a “standard drink” is the amount of any alcoholic beverage that contains 0.6 fl oz or 14 grams of pure alcohol. The concept of a “drink” or “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 or 14 g. 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. We think the definition of a “standard drink” could be made more understandable to consumers by providing this context.

In educational materials, we also recommend providing graphic depictions showing the equivalent of one drink for different types of alcoholic beverage. This is done very well in the NIAAA’s recent *Rethinking Drinking* booklet, which is mentioned favorably in the DGAC report.

Calorie Information for Non-Traditional Alcoholic Beverages

We propose that Table 16 (Calories in Selected Alcoholic Beverages) in the current alcohol guideline be expanded to include calorie information for some of the non-traditional alcoholic beverages that have become increasingly popular in recent years (*e.g.*, alcoholic energy drinks, sweet liquor products, and mixed drinks that contain multiple sources of alcohol). This table currently provides calorie counts for beer (both regular and “lite”), red and white wine, dessert wine, and 80-proof distilled spirits. Given the fact that labels of alcoholic beverages, with the exception of “lite” beers, are not required to list calories, this table provides valuable information to consumers and should be expanded to include a greater variety of products. This table should make clear, however, that for mixed drinks that the additional calories come from the mixers and that there are lower calories alternatives.

Improving Labeling of Alcoholic Beverages

Finally, we urge both USDA and HHS to speak out in support of improved labeling of alcoholic beverages. While we understand that USDA and HHS do not have jurisdiction over alcoholic beverage labeling, we ask that you be mindful of the stalled rulemaking to reform alcohol labeling at the Alcohol and Tobacco Tax and Trade Bureau (TTB). If USDA and HHS would just signal their support for improved alcohol labeling, or at least indicate the importance of such labeling (*e.g.*, by emphasizing the definition of a “standard drink” in the 2010 *Dietary Guidelines*), this would have an enormous impact.

The current labeling requirements for alcoholic beverages are woefully 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.³ Thus, most alcoholic beverage labels do not have any of the information an individual would need to follow the *Dietary Guidelines*’ recommendations on moderate consumption of alcohol and calories.

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.

Since 1972, consumer and public health groups have argued for improved labeling of alcoholic beverages. In 2003, we petitioned TTB to require a standard “Alcohol Facts” panel on all labels of beer, wine, and distilled spirits. We requested that the Alcohol Facts panel include such basic information as serving size, calories per serving, alcohol content per serving, and the definition of a “standard drink.” TTB published a proposed rule in 2007 to require a “Serving Facts” panel on alcoholic beverage labels but inexplicably omitted the most important information, the amount of alcohol and the number of standard drinks. The agency has taken no further action since then. As a result, beverage alcohol remains the only major category of consumable product that lacks the basic label information needed by consumers to adhere to the *Dietary Guidelines*.

About the Consumer Federation of America

Consumer Federation of America is a non-profit association of some 280 organizations, with a combined membership of over 50 million Americans. Since its founding in 1968, CFA has worked to advance the interests of American consumers through research, education, and advocacy.

About the National Consumers League

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

³ The 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.

consumers and workers in the United States and abroad. NCL is a private, nonprofit membership organization. For more information, visit www.nclnet.org.

Respectfully submitted,



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Sally Greenberg
Executive Director
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cc: Mr. Kevin Concannon, Under Secretary for Food, Nutrition, and Consumer Services
Dr. Janey Thornton, Deputy Under Secretary for Food, Nutrition, and Consumer Services
Dr. Howard K. Koh, Assistant Secretary for Health
Ms. Penelope Slade-Sawyer, Deputy Assistant Secretary for Health (Disease Prevention and Health Promotion)