



Consumer Federation of America

August 13, 2020

Eve Essery Stoody, PhD
Designated Federal Officer
Co-Executive Secretary
Center for Nutrition Policy and Promotion
Food and Nutrition Service
Food, Nutrition, and Consumer Services
U.S. Department of Agriculture

RE: Alcoholic Beverages

SUBMITTED VIA REGULATIONS.GOV

Dear Dr. Stoody:

The Consumer Federation of America (CFA) appreciates the opportunity to submit these comments on the Dietary Guidelines Advisory Committee's Final Advisory Report to the Departments of Agriculture (USDA) and Health and Human Services (HHS). CFA writes to express support for the Final Advisory Report's recommendations regarding alcohol consumption. We urge you to incorporate the Report's advice on alcohol into the next *Dietary Guideline for Americans*. Should the agencies choose to omit or accept only parts of the conclusions from the Final Advisory Report, you should "provide the public with a clear explanation" as to why, consistent with the recommendations of the National Academies of Sciences, Engineering and Medicine.¹

For decades, the Dietary Guidelines for Americans have helped to fuel the myth that moderate alcohol consumption contributes to a longer life. As recently as 2010, the DGA's included the statement: "Strong evidence from observational studies has shown that moderate alcohol consumption is associated with a lower risk of cardiovascular disease."² The 2015 Guidelines refrained from touting alleged health benefits of alcohol, but they also stopped referring to the research linking alcohol and cancer. In doing so, the 2015 Guidelines offered a misleading portrayal of the science. A growing body of research demonstrates that even moderate alcohol consumption increases cancer risk.³ At the same time, recent studies have cast doubt on claims that moderate drinking improves cardiovascular health or produces other health benefits.⁴ Most recently, scientist have employed

¹ National Academies of Sciences, Engineering, and Medicine. Redesigning the Process for Establishing the *Dietary Guidelines for Americans*. The National Academies Press. 2017:12. <https://doi.org/10.17226/24883>.

² Dietary Guidelines for Americans, 2010, p.31, available at: <https://health.gov/sites/default/files/2020-01/DietaryGuidelines2010.pdf>.

³ Bagnardi et al. "Light alcohol drinking and cancer: a meta-analysis," *Annals of Oncology*, Volume 24, Issue 2, February 2013, Pages 301–308, <https://academic.oup.com/annonc/article/24/2/301/223860>

⁴ See, e.g. I Chikritzhs T, Fillmore K, Stockwell T. [A healthy dose of skepticism: four good reasons to think again about protective effects of alcohol on coronary heart disease](#)External. *Drug Alcohol Rev* 2009;28:441–4; Andréasson S, Chikritzhs T, Dangardt F, Holder H, Naimi T, Stockwell T. [Evidence about health effects of "moderate" alcohol consumption:](#)

genetic data to conduct so-called Mendelian randomization studies, which indicate that any association between moderate alcohol consumption and lower risk of cardiovascular disease is largely due to reverse causality or residual confounding.⁵

The Final Advisory Report summarizes its recommendations as follows:

- “Do not begin to drink alcohol or purposefully continue to drink because you think it will make you healthier.
- If you drink alcohol, at all levels of consumption, drinking less is generally better for health than drinking more.
- For those who drink alcohol, recommended limits are up to 1 drink per day for both women and men.”

Given the state of the science, the agencies should not hesitate to incorporate these modest revisions into the new DGAs. In particular, the last recommendation, which lowers the recommended limit for men from two to one drink per day, has a strong scientific foundation, with the consumption of up to 1.5 drinks per day accounting for an estimated 26 to 35 percent of all alcohol-attributable U.S. cancer deaths.⁶

The agencies should consider additional language in the DGAs to further educate the public about the cancer risks associated with alcohol, such as the statement: “For cancer prevention, it is best not to drink *any* alcohol.” Drinking alcohol is the third most important cause of cancer that is within a person’s control, behind smoking and obesity.⁷ Each year, alcohol consumption causes more cancer deaths than exposure to ultraviolet radiation.⁸ And it is not just heavy drinking, although the risk does increase with the amount consumed. Scientists have long understood that even “light” alcohol consumption—less than one drink per day—also causes cancer and indeed, the 2000 Dietary Guidelines for Americans acknowledged as much.⁹

Unfortunately, most consumers in the United States remain unaware of the link between alcohol use and cancer. Recent surveys show that less than half of U.S. consumers identify alcohol as

[reasons for skepticism and public health implications.Cdc-pdf\[PDF-9.44 MB\]External](#) . In: *Alcohol and Society 2014*. Stockholm: IOGT-NTO & Swedish Society of Medicine, 2014; Knott CS, Coombs N, Stamatakis E, Biddulph JP. [All cause mortality and the case for age specific alcohol consumption guidelines: pooled analyses of up to 10 population based cohortsExternal](#). *BMJ* 2015;350:h384; Holmes MV, Dale CE, Zuccolo L, et al. [Association between alcohol and cardiovascular disease: Mendelian randomisation analysis based on individual participant data.External](#) *BMJ* 2014;349:g4164; Naimi TS, Brown DW, Brewer RD, et al. [Cardiovascular risk factors and confounders among nondrinking and moderate-drinking US adultsExternal](#). *Am J Prev Med* 2005;28(4):369–73.

⁵ Millwood IY, et al. Conventional and Genetic Evidence on Alcohol and Vascular Disease Aetiology: A Prospective Study of 500 000 Men and Women in China. *Lancet*. 2019;393(10183):1831-1842.

⁶ Nelson DE, et al. Alcohol-Attributable Cancer Deaths and Years of Potential Life Lost in the United States. *Am J Public Health*. 2013;103(4):641-648.

⁷ *Cancer Facts & Figures*, AM. CANCER SOC. 42-49 (2019), <https://www.cancer.org/content/dam/cancer-org/research/cancer-facts-and-statistics/annual-cancer-facts-and-figures/2019/cancer-facts-and-figures-2019.pdf>; Islami F, Goding Sauer A, Miller KD, et al. Proportion and number of cancer cases and deaths attributable to potentially modifiable risk factors in the United States. *CA Cancer J Clin*. 2018;68: 31-54.

⁸ *Id*.

⁹ Dietary Guidelines for Americans, 2000, p.36 available at: <https://www.dietaryguidelines.gov/sites/default/files/2019-05/2000%20Dietary%20Guidelines%20for%20Americans.pdf> (“Even one drink per day can slightly raise the risk of breast cancer.”).

a cancer risk.¹⁰ Even among cancer survivors, awareness of the risks associated with alcohol is alarmingly low.¹¹ The DGAs should address this troubling gap between scientifically established fact and popular understanding. The recommendations in the Final Advisory Report represent an important step towards scientifically sound advice on alcohol.

Thank you for your consideration of these comments.

Sincerely,

Thomas Gremillion
Director of Food Policy
Consumer Federation of America

¹⁰ *Survey: Fewer than half of Americans recognize alcohol, processed meats, other controllable factors affect cancer risk*, AM. INST. FOR CANCER RESEARCH (Feb. 1, 2017), <http://www.aicr.org/press/press-releases/2017/Fewer-than-half-of-Americans-recognize-alcohol-processed-meats-affect-cancer-risk.html>.

¹¹ Hawkins et al. “Awareness of Dietary and Alcohol Guidelines Among Colorectal Cancer Survivors.” *American Journal of Preventive Medicine* (2015), <https://www.sciencedirect.com/science/article/pii/S0749379715004869> (finding that, among 593 survivors of colorectal cancer—a cancer to which alcohol is known to specifically contribute —“15% had never heard of recommendations to limit alcohol,” and 11% percent were only “slightly familiar” with those recommendations.).