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ALCOHOL JUSTICE COMMENTS ON 2015 DIETARY GUIDELINES REPORT

Alcohol Justice (formerly Marin Institute) is a public health nonprofit and alcohol industry watchdog with a 28-year history of advancing evidence-based policies to decrease alcohol-related harm. We appreciate the opportunity to offer comments on the 2015 Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans (Report).

We are extremely concerned by the following suggestions from the Report:

- That increased daily drinking is safe;
- That known risks and documented harms from alcohol are less important than unsubstantiated health claims; and
- That messages from health care providers to both patients, and the general public, should include alcohol consumption.

These suggestions are questionable and likely dangerous. They also represent a significant departure from previous recommendations without providing sufficient scientific basis to justify such a shift.

The current Guidelines define moderate drinking as daily limits of up to 1 drink/day for women, and up to 2 drinks/day for men. In contrast, the proposed change in the Guidelines would base moderate drinking limits on average, rather than daily, consumption. The proposed change indicates that safe drinking for women is up to 3 drinks in a day, and for men up to 4 drinks in a day, so long as the averages are not exceeded. This effectively triples the daily limit for women and doubles the daily limit for men. This is not low-risk drinking by any reading of the science.

Since most adult drinkers in the U.S. don't drink every day, the proposed change effectively encourages consumption right up to binge drinking levels, thus increasing health risk. Binge drinking (4 or more drinks per occasion for women; 5 or more drinks per occasion for men) causes more than half of all alcohol-related deaths each year in the U.S., and impairment and increased risk begin below those levels. Excessive drinking is responsible for 1 in 10 deaths among working-age adults in the U.S.

Therefore, the proposed changes regarding alcohol consumption will endanger public health.

The Report also implies that drinking alcohol is a suggested intervention to discuss with health care providers, as well as a general recommendation for all Americans to include as part of lifestyle plans for wellness. These are messages promoted by beer, wine, and spirits producers and their trade organizations.

There are **no** randomized studies showing any health benefits from any level of alcohol consumption. There is also no evidence that moderate drinking promotes a healthy lifestyle.

There is no public health organization that recommends starting to drink alcohol for abstainers, or drinking more alcohol for current drinkers, as either a preventive behavior to address specific medical problems, or as a population-level primary prevention strategy. Rather, public health agencies including Alcohol Justice work tirelessly at local, state, and federal levels to address the tremendous physical, social, and economic harm caused by alcohol.

We were concerned in 2010 when these same types of radical changes were proposed, and without scientific substantiation. Thankfully, the Committee retained evidence-based limits on alcohol consumption in the 2010 Guidelines. We remain concerned in 2015 that despite the Report's caveats, the industry will use the changed Guidelines to promote drinking, and drinking at increased levels. The substantial shift to recommending higher per-occasion and per-day alcohol consumption, plus suggesting that the known risks of harm are not as important as claims of questionable health benefits, are gifts to the alcohol industry.

The Committee must be aware that the Report's messages about alcohol consumption will be misinterpreted by the powerful corporations and trade organizations that sell and promote alcoholic beverages. The alcohol industry has a long history of exploiting the Dietary Guidelines for their benefit, and the suggestions contained in the Report lend themselves to further misuse.

We strongly encourage the Committee to review and reconsider the evidence base regarding increased levels of alcohol consumption and the myriad of resulting alcohol-related harms, as well as health outcomes from alcohol consumption, with regard to our concerns outlined above. We ask that the Committee revise the Report and subsequent Guidelines to send a more cautionary, evidence-based message regarding alcohol consumption to the public. Finally, we recommend that the 2015 Guidelines maintain the 2/1 drink-per-day definition for lower-risk consumption.

We hope that any changes made to the Guidelines are made in the interest of public health and safety. Given the new evidence that drinking alcohol at even very low levels increases risk of various harms, the Dietary Guidelines should encourage Americans to drink less – not more.