



August 13, 2020

Mr. Brandon Lipps
Deputy Under Secretary for Food, Nutrition & Consumer Services
U.S. Department of Agriculture
1400 Jefferson Drive, SW
Washington, DC 20024

Captain Paul Reed, M.D.
Deputy Assistant Secretary for Health, Medicine & Science
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Mr. Lipps and Captain Reed:

The Dietary Guidelines for Americans (DGA) provide an important blueprint for healthy eating and drinking. They are generally recognized as good advice given their avoidance of science-free recommendations. However, new guidance from the Advisory Committee departs from that standard. The Committee walks back a recommendation that has been in place for 30 years—which suggests consuming two drinks per day for men and one for women is aligned with a healthy lifestyle. The Committee is now lobbying the government to advise both men and women to consume no more than one drink per day—a 50 percent reduction for males.

The change is unsupported by the evidence.

The over 800-page report notes data analyzed to make the decision “...was comprised of observational studies, with no randomized trials.” Observational studies are **historically unreliable**. The information is collected via surveys asking participants to recall consumption from many months or years ago. Can you even remember how many times you had meat at dinner last month? Last year? The approach is also unable to account for relevant confounding variables—including previous smoking habits, diet, exercise and other lifestyle choices that have an impact on health. As the report reads: “[the] studies typically lacked consideration of multiple key confounders...”

Notwithstanding the flawed methodology, support for lowering the daily drink level for men is far from reaching a scientific consensus. Only a **single study** considered by the committee investigated the health outcome differences between consuming one and two drinks per day for males. The integrity of government advice shouldn’t be compromised by relying on a single undependable analysis. The recommendation also parts with scientific precedent and acknowledgement that men and women react differently to beverage alcohol by advising that both genders abide by the same guideline.

The consequences of alcohol abuse shouldn’t be conflated with the impacts of moderate consumption—especially when relying on a small pool of weak research. The USDA and HHS should rely on sound science when publishing the final version of dietary guidelines and maintain the current recommendations until there is sufficient evidence supporting change.

Sincerely,

Richard Berman
Executive Director
American Beverage Institute