



Kristin Koegel  
U.S. Department of Agriculture  
Food and Nutrition Service  
Center for Nutrition Policy and Promotion  
1320 Braddock Place, Room 4094  
Alexandria, VA 22314

12 August 2020

### **US Dietary Guidelines**

The Brewers Association of Australia is concerned by the shift in academic dietary guidance away from rigorous, evidentiary data in preference for engineering social change without scientific basis or, indeed, ignoring established, relevant research.

Inherent with such misguided approaches is the desire to deny the public the capacity to make informed personal choices. Rather, there is a trend to mislead consumers to manipulate public behaviour. It's a case of academia knows best, with such a view justifying the clouding of facts because the public cannot possibly make the right choices when presented with facts.

Rather than address incidence of harmful alcohol consumption and the causes of why some people drink to excess, inherent in this misleading approach is the desire to reduce the total overall alcohol consumed, including those who already consume responsibly. These can often be accompanied by punitive measures to force the public into submission.

The Dietary Guidelines Advisory Committee has sought to consider science outside its scope, seemingly, to concoct an argument to undermine scientific standards and further constrict the prevailing advice.

A case in point is the sub-committee's 17 June 2020 summary recommendations, noting that the current consumption guidelines, present in the Dietary Guidelines since 1990, align with "an early and influential meta-analyses on alcohol and all-cause mortality". The sub-committee stipulated the current consumption guidelines "constitute reasonably low risk".

Yet, the sub-committee now advises "tightening" the recommendation, especially for men, as an "aspirational" goal in reducing the advice to one drink per day.

The evidence supporting this advice, despite the prevailing evidence, cited 81 references that were not part of the USDA's Nutrition Evidence Systematic review protocol on alcohol consumption and all-cause mortality.

In essence, the sub-committee disregarded the NESR systematic review protocol, which included 60 graded studies, to rely upon ungraded, out-of-scope references (mainly Mendelian Randomization studies dealing with alcohol and cardiovascular disease and alcohol and certain cancers).

This has the clear effect of weakening the scientific basis for the Dietary Guidelines and, thereby, undermining public confidence in its recommendations and the impartiality of what should be unassailable public information.

We understand this breaches the sub-committee's responsibilities under the 2020 DGAC Charter.

Further, adopting flawed, ungraded and out-of-scope references that seemingly seek to arrive at a pre-determined outcome is contrary to rigorous, scientific methodology in pursuit of sound public advice.

While *excessive* consumption of alcohol is linked with increased risk, this is not the evidence at low and moderate levels of consumption.

Indeed, there is significant evidence to demonstrate that lower levels of alcohol consumption are thought to provide protections against coronary heart disease, Type 2 diabetes, ischemic stroke and better cognitive function. The reference paper, *Di Castelnuovo et al, 2006*, states that: "Consumption of alcohol, up to 4 drinks per day in men and 2 drinks per day in women, was inversely associated with total mortality," (See: [https://jamanetwork.com/journals/jamainternalmedicine/articlepdf/769554/ira60012\\_2437\\_2445.pdf](https://jamanetwork.com/journals/jamainternalmedicine/articlepdf/769554/ira60012_2437_2445.pdf))

The Brewers Association of Australia does not seek to comment on the scientific basis for these findings – this is not our area of expertise. However, we do draw your attention to the clear aims of the guidelines which are to assist the general public in understanding the risks of alcohol-related harm and to support informed decision-making through the provision of evidence-based modelling and advice.

Any out-of-scope departure from these aims that produces misleading information to affect social change would be misguided and undermine the very purpose of dietary guidelines in providing factual materials for consumers to make informed choices.

Kind regards,



**Brett Heffernan**  
Chief Executive Officer  
Brewers Association of Australia