



Secretary Sonny Perdue
United States Department of Agriculture
1280 Maryland Ave SW
Washington, DC 20250

Dear Secretary Perdue:

The following comments are respectfully submitted in response to the U.S. Department of Agriculture's Scientific Report of the 2020 Dietary Guidelines Advisory Committee.

We write on behalf of the R Street Institute, a nonpartisan public policy research organization located in Washington, D.C. R Street is the only national think tank with a dedicated alcohol policy research team that studies and analyzes the laws and regulations governing alcohol in the United States. We favor rational alcoholic beverage policies that respect individual freedom, free enterprise and the public well-being.

As you know, the Dietary Guidelines for Americans are published every five years as part of a joint effort by the U.S. Department of Agriculture (USDA) and the U.S. Department of Health and Human Services (HHS). These guidelines often prove influential in the eating and drinking habits of Americans, and in influencing laws and policies at the national, state and local level of government.

Given the potential importance of the Guidelines, it is vital that any recommended changes be firmly based on sound scientific evidence. Unfortunately, we believe that the 2020 Dietary Guidelines Advisory Committee's recommendation on alcohol consumption—specifically its guidance on moderate alcohol consumption for adult men being changed from up to two drinks per day to up to one drink per day—does not meet that standard.

The 2020 Dietary Guidelines Advisory Committee was tasked with conducting, via the USDA's Nutrition Evidence Systematic Review (NESR), a comprehensive review of scientific literature and evidence upon which to base its recommendations. As part of this effort, the Beverages and Added Sugars Subcommittee reviewed the relationship between alcohol consumption and all-cause mortality.

While the scientific studies that were included within NESR's systematic review did not support a change to alcohol consumption guidelines for either adult men or women, the 2020 Dietary Guidelines Advisory Committee inexplicably decided to go beyond the systematic review to include additional recent scientific studies regarding alcohol consumption.

This additional evidence included over 80 references that were outside the systematic review—and therefore ungraded by the NESR—to conclude that consumption guidelines for men should be reduced

to one drink per day. Of the 80 out-of-scope references considered, it appears that only one study directly explored the relationship of one vs. two drinks for adult men.

Basing consumption recommendations on minimally supported scientific evidence that was outside the systematic review clearly falls far short of the Committee's responsibility, as stated by USDA and HHS, that the dietary guidelines "reflect the preponderance of scientific evidence."¹ Given the failure to adhere to these mandated standards, numerous outside observers and scientific experts have understandably questioned the Committee's revised drinking recommendations.²

It is unclear why the Committee worked outside the systematic review process to introduce additional studies, but until such studies are properly reviewed and graded, it would be improper to change any drinking recommendations under the Dietary Guidelines.

Transparent, evidence-based policymaking is the hallmark of a healthy and functioning democratic system of governance. It is vital that all levels of government—including federal agencies—strive to meet these ideals. Unfortunately, in this circumstance, it appears that the Committee failed to do so.

Respectfully submitted,

C. Jarrett Dieterle
Director of Commercial Freedom
The R Street Institute

Chelsea Boyd
Harm Reduction Research Fellow
The R Street Institute

¹ "USDA and HHS Announce Dietary Guidelines Advisory Committee Meeting Will be Held Online," Release No. 0177.20, March 9, 2020. <https://www.usda.gov/media/press-releases/2020/03/09/usda-and-hhs-announce-dietary-guidelines-advisory-committee-meeting>.

² Mitch Frank, "U.S. Dietary Guidelines Panel Takes Aim at Moderate Wine Drinkers," *Wine Spectator*, Aug. 5, 2020. <https://www.winespectator.com/articles/u-s-dietary-guidelines-panel-takes-aim-at-moderate-wine-drinkers>.