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RE: Document Number: 2025-00416; Notice Citation. 90 FR 3883; Request for Public Comments on Reports on Alcoholic Beverages and Health to Inform the Dietary Guidelines for Americans, 2025-2030

Dear Ms. de Jesus & Dr. Stoody,

[PolicyLab at Children's Hospital of Philadelphia](#) (CHOP) appreciates the opportunity to provide comments on the [Interagency Coordinating Committee on the Prevention of Underage Drinking \(ICCPUD\) Alcohol Intake and Health Draft Report](#), which will inform the *Dietary Guidelines for Americans (DGA) 2025-2030*. As a research center dedicated to advancing policies that improve child and adolescent health, we commend the report's thorough review of the health risks associated with alcohol consumption and support efforts to ensure the next edition of the DGA reflects the best available scientific evidence.

Our expertise as pediatricians, child and adolescent health researchers, and in health policy informs two critical recommendations:

- **Incorporating explicit alcohol guidance within the *Children and Adolescents* chapter of the DGA**, which has been absent in previous editions despite strong evidence of harm
- **Implementing increased transparency in nutritional and health labeling on alcoholic beverages** to improve consumer awareness and inform decision-making

I. The Need for Explicit Child and Adolescent Specific Guidance in the DGA

The *Draft Report on Alcohol Intake and Health* provides compelling evidence that alcohol consumption, particularly among adolescents and young adults, is associated with significant public health risks, including its **impact on brain development, increased risk of substance use disorders, and the significant contribution of alcohol to injury and mortality among this population.**

These risks extend beyond acute consequences, with **early alcohol exposure increasing lifetime risks for alcohol use disorder (AUD), cancer, and chronic disease**. However, past editions of the DGA have failed to include explicit alcohol guidance for youth, which contradicts the growing body of research of its harms and undermines efforts to reduce underage drinking. This omission must be addressed in the 2025-2030 DGA.

a. Youth Alcohol Use and Public Health Impact

The ICCPUD report highlights:

- Alcohol remains the most commonly used substance among youth in the United States, with 8.6% of individuals aged 12 to 20 years old reporting binge drinking in the past month
- The risk of alcohol-attributable death is significant even at low levels of consumption, with alcohol use among individuals aged 15 to 20 years old contributing to increased rates of injury, traffic fatalities, and suicide
- Adolescent drinking patterns are strongly correlated with adult drinking behaviors, underscoring the need for early prevention strategies

b. Developmental and Health Consequences of Underage Drinking

Emerging research on adolescent brain development reinforces the need for explicit DGA guidance on alcohol use:

- [Alcohol consumption during adolescence disrupts brain maturation](#), affecting cognitive function, impulse control, and long-term mental and behavioral health outcomes
- [Studies demonstrate a dose-response relationship between adolescent alcohol use and increased risk for AUD in adulthood](#)
- The ICCPUD report finds that even a single drink per day is associated with elevated risks for cancer, liver disease, and other chronic conditions later in life

Parents, caregivers, and healthcare professionals rely on the DGA for authoritative guidance on child and adolescent nutrition, yet previous editions have failed to include explicit recommendations on alcohol use for youth. Without clear guidance, families may assume occasional consumption is acceptable, and healthcare providers may lack a strong federal framework to support counseling on alcohol prevention.

The 2025-2030 DGA must correct this exclusion by clearly stating that [no level of alcohol consumption is safe for individuals under 21 years of age](#) and integrating this guidance into the *Children and Adolescents* chapter. In addition, aligning with established public health recommendations, the DGA should emphasize [early alcohol use increases the risk of lifelong health consequences](#) like AUD, cancer, and liver disease, and that [parents and caregivers should actively discourage alcohol consumption among children and adolescents](#).

Including these statements will reinforce broader public health efforts to delay alcohol initiation and prevent alcohol-related harm, just as the DGA has done for added sugars and caffeine.

II. Improving Consumer Transparency Through Nutritional and Health Labeling on Alcoholic Beverages

As pediatric health experts, we emphasize that families need **transparent and comprehensive consumer information** on alcohol content and health risks, particularly given alcohol's **unique dangers for children and adolescents**. While the DGA does not have direct regulatory authority over alcohol labeling policy, it plays a key role in **shaping public health priorities** and guiding **interagency collaboration**. Due to the strong in the ICCPUD report regarding health risks associated with alcohol consumption, the U.S. Department of Health and Human Services (HHS) and U.S. Department of Agriculture (USDA) should recognize the importance of consumer transparency in alcohol labeling, especially for families and young people.

The DGA should acknowledge the need for standardized, transparent labeling on alcoholic beverages, including caloric content, sugar levels, and health risks, and encourage **HHS and USDA to support interagency efforts with the Alcohol and Tobacco Tax and Trade Bureau (TTB) and the Food and Drug Administration (FDA)** to ensure consumers have access to accurate, standardized information.

a. The Need for Transparency in Alcohol Labeling

Unlike other beverages, alcohol remains exempt from standard nutritional labeling requirements, leaving consumers without critical information, such as:

- [Alcohol is a major source of added calories and sugars](#), contributing to obesity and metabolic disease
- [Alcohol's causal role in at least seven types of cancer](#)
- [Many individuals underestimate their alcohol consumption](#) due to lack of standardized serving size information

Countries like [Canada](#), [Ireland](#), and [Australia](#) have already taken steps to improve alcohol labeling, requiring health warnings, standard drink labeling, and nutrition facts on alcoholic beverages. [Studies show that clear, visible labels increase consumer awareness of alcohol-related risks and reduce excessive consumption](#) as well as [influence healthier dietary behaviors in adolescents](#). The United States should follow suit by implementing:

- **Caloric and sugar content labeling** on all alcoholic beverages
- **Standardized serving size information** to align with dietary guidelines
- **Prominent health warnings** linking alcohol consumption to cancer, liver disease, and pregnancy risks

Improved labeling would provide consumers with the information necessary to make informed decisions about their alcohol intake.

III. Elevating Pediatric and Adolescent Health in the DGA's Alcohol Guidance

PolicyLab at CHOP strongly supports the ICCPUD *Alcohol Intake and Health Draft Report* findings on alcohol-related health risks and urges HHS and USDA to ensure the 2025-2030 DGA incorporates this critical evidence by:

- **Explicitly addressing alcohol use in the *Children and Adolescents* chapter**, reinforcing that there is no safe level of consumption for individuals under 21 years of age
- **Advocating for transparent and comprehensive nutritional and health labeling on alcoholic beverages** to provide consumers with essential information about alcohol's risks

By incorporating these recommendations, the DGA can align with the latest public health research and play a vital role in reducing alcohol-related harm among youth and families.

We appreciate the opportunity to provide these comments and welcome further discussion on how PolicyLab can support efforts to ensure the DGA reflects the best available evidence on alcohol and health.

Sincerely,

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