



The Honorable Brandon L. Taylor
Deputy Assistant Secretary for Health
200 Independence Avenue, SW Washington, DC 20201

Concerns Regarding ICCPUD Alcohol Intake & Health Report

I am writing on behalf of the consumer advocacy group, Consumer Choice Center, to express our concerns with the Interagency Coordinating Committee on the Prevention of Underage Drinking (ICCPUD) Alcohol Intake and Health (AIH) [report](#) and its potential impact on the formation of the *2025–2030 U.S. Dietary Guidelines*.

While we recognize the importance of advancing public health initiatives and minimizing the inherent risks associated with alcohol consumption, the process that led to the ICCPUD report raises significant questions about its credibility. Americans rely on unbiased and practical guidelines from the government on which to base their dietary choices, and when data is used in a sensational manner to overemphasize potential risk, trust in these guidelines is diminished and reduced.

The ICCPUD report appears to be influenced by ideological bias rather than transparent scientific analysis. The AIH report is co-authored by Tim Naimi, an anti-alcohol activist researcher [with declared financial ties](#) to the International Order of Good Templars, also known as Movendi, a temperance group linked to the World Health Organization (WHO). Naimi's associate, Dr. Tim Stockwell, is cited throughout the AIH report, suggesting even further systematic bias against alcohol.

These researchers represent the WHO's position that there is "no safe amount of alcohol". Considering the Trump Administration's intent to withdraw the U.S. from the WHO, it is worth considering how the WHO actively influenced taxpayer-funded research, such as the AIH report by ICCPUD. The International Scientific Forum on Alcohol Research has called the conclusions of Naimi, Stockwell, and WHO-linked researchers, "pseudo-scientific amalgamations."

Moreover, ICCPUD's mandate, which focuses on underage drinking prevention, does not extend to regulating or attempting to shift adult drinking habits. The committee's overreach was par for the course during the Biden Administration and duplicated the comprehensive, Congressionally mandated [research](#) by the National Academies of Sciences, Engineering, and Medicine (NASEM). Congress allocated \$1.3 million for NASEM to conduct a rigorous, unbiased review of alcohol's health impacts to inform the 2025 Dietary Guidelines.



Risk Assessment Needs Context and Moderation Should Be The Message

1. ICCPUD findings were consistent with those of the Canadian Centre for Substance Use and Addiction (CCSA) reported that a man consuming two drinks per day increases his absolute risk for colorectal cancer by only **0.0028%**. For all cancers measured (including liver, colorectal, esophagus, larynx, and oral/pharynx), the total absolute increase in risk for a man drinking two drinks per day is **0.0099%**. For women, this came out to 0.0088, or 8.8 one-hundredths of a percent.
2. These are not statistically significant enough numbers to justify the Biden Administration US Surgeon General's [call](#) for “cancer warning labels” on alcohol to try and deter consumers. This has the worst possible effect of dampening consumer trust in warning labels, as found by a [2016 paper](#) from the Harvard Kennedy School on ubiquitous cancer warning labels in the state of California.
3. Observational studies used to link moderate alcohol consumption to cancer suffer from methodological flaws, namely the inability to establish causation, only correlation. Public health authorities should continue consistent messaging on the dangers of binge drinking and the benefits of responsible consumption

In light of these issues, we strongly recommend HHS **suspend ICCPUD’s involvement in the 2025–2030 U.S. Dietary Guidelines** and discontinue the use of the ICCPUD AIH in its decision-making framework. Deference should be given to Congress’s directive for NASEM to produce a comprehensive, unbiased evaluation.

American consumers deserve dietary guidelines informed by robust, impartial science—not ideological crusades or duplicative research promulgated by biased researchers. We urge HHS to refocus its efforts on delivering clarity and credibility in its recommendations, respecting the Congressional mandate, and upholding public confidence in the process.

Thank you for your attention to this matter. I am available to discuss these concerns further at your convenience.

Sincerely,

Stephen Kent | Consumer Choice Center | stephen@consumerchoicecenter.org

A handwritten signature in black ink, appearing to read 'Stephen Kent', written in a cursive style.