



August 10, 2020

USDA Food and Nutrition Service
Center for Nutrition Policy and Promotion (CNPP)
1320 Braddock Place, Room 4094
Alexandria VA 22314

RE: Docket ID: FNS-2020-0015, Scientific Report of the 2020 Dietary Guidelines Advisory Committee

The National Barley Growers Association (NBGA) writes to submit comments on the scientific report of the 2020 Dietary Guidelines Advisory Committee. NBGA is a non-profit commodity organization and is the principal representative of U.S. barley growers on national policy issues. Approximately 162 million bushels of barley are produced annually in the U.S. with an estimated value of \$685 million, 2/3 of which is used as the basic ingredient for beer as well as some whiskey production. Barley producers stimulate the rural economy through the purchase of fertilizer, seed, chemicals, fuel, labor, other supplies and farm equipment with an average economic impact of \$499 million annually.

NBGA is concerned that the Beverages and Added Sugars Subcommittee (Subcommittee) chose to ignore the conclusions of the scientific review of evidence that supported continuation of the current consumption guidelines for alcohol: up to one drink per day for women and up to two drinks per day for men. Instead, the Subcommittee chose to include an “aspirational” recommendation to reduce consumption guidelines for men to one (1) drink per day based on ungraded, out-of-scope references.

NBGA encourages the USDA and HHS to question the propriety of adopting the “aspirational” recommendation to lower the consumption guidelines for men, especially as the recommendation leaps over decades of clear science and sound public policy. Instead of adopting these flawed and conclusory statements and recommendations based on ungraded, out-of-scope references, the USDA and HHS should continue the sound advice on alcohol and alcohol consumption found in the 2015 Dietary Guidelines for Americans. That advice is:

- If alcohol is consumed, it should be in moderation – up to one (1) alcohol drink- equivalent per day for women, and up to two (2) per day for men.
- One alcohol drink-equivalent has 14 g (0.6 fl oz.) of pure alcohol. The following are reference beverages that are one alcohol drink-equivalent: 12 fluid ounces of regular beer (5% alcohol), 5 fluid ounces of wine (12% alcohol), or 1.5 fluid ounces of 80 proof distilled spirits (40% alcohol).
- If you choose to drink alcohol, know the differences between the types, sizes, and alcohol content of alcohol beverages in the market so you may understand and keep track of how much alcohol you are consuming.
- Do not consume alcohol beverages on an empty stomach. Food slows the absorption rate of alcohol beverages. If you choose to consume alcohol beverages, eat food before or while drinking. Also, stay hydrated (with water or other non-alcohol beverages) when consuming alcohol beverages.
- Discuss any concerns about alcohol beverage consumption with your healthcare provider. There are some people who should not consume alcohol beverages at all. Examples include, but are not limited to, those who are under 21, women who are pregnant, or those that have a medical or family condition or history of concern.

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NBGA thanks you for this opportunity to offer comments on the scientific report of the 2020 Dietary Guidelines Advisory Committee.

Sincerely yours,

A handwritten signature in black ink that reads "Buzz Mattelin". The signature is written in a cursive, flowing style.

Milo "Buzz" Mattelin
President, National Barley Growers Association