



**Health**  
**NEW YORK CITY DEPARTMENT OF**  
**HEALTH AND MENTAL HYGIENE**

Michelle Morse, MD, MPH  
*Acting Health Commissioner*

February 4, 2025

U.S. Department of Health and Human Services, U.S. Department of Agriculture

*Via electronic submission* - [Guidance on Alcoholic Beverages in the Dietary Guidelines for Americans](#) | [Dietary Guidelines for Americans](#)

**Re: Reports on the relationship between alcohol and health to inform Dietary Guidelines for Americans, 2025-2030**

Alcohol use contributes to a considerable amount of mortality in New York City. In 2021, there were 2,423 alcohol-attributable deaths due to excessive alcohol use among New York City residents 20 years and older ([source](#)), underscoring the NYC Health Department’s interest in commenting on the recent National Academies of Sciences, Engineering, and Medicine (NASEM) and Interagency Coordinating Committee on the Prevention of Underage Drinking (ICCPUD) reports. These reports synthesize evidence on the association between alcohol consumption and a variety of health outcomes.

Based on the evidence provided, which is somewhat conflicting, we encourage HHS and USDA to use explicit and plain language in the 2025-2030 Dietary Guidelines for Americans when describing the quality and breadth of evidence around the harms associated with alcohol use such that it is clear and actionable for the public. For example, there is now a *substantial body* of evidence demonstrating that health risks increase as alcohol consumption increases, and risks are present even at low (less than one drink per day) to moderate (one drink per day for women and two drinks per day for men) levels of alcohol consumption. This framing contrasts with language used in the 2020-2025 guidelines suggesting that evidence on the relationship between moderate alcohol consumption and risk of death from various causes, including cardiovascular disease and some types of cancer, is *emerging*. We also encourage HHS and USDA to highlight the increased risk for *specific cancer types* posed by alcohol consumption that is within the current recommended limits in the 2025-2030 Dietary Guidelines. Current guidelines include more general language (“Alcohol has been found to increase risk for cancer, and for some types of cancer, the risk increases even at low levels of alcohol consumption”) that inadequately conveys the established causal relationship between alcohol consumption and specific cancers – namely cancers of the breast (in women), colorectum, liver, esophagus, oral cavity, pharynx, and larynx.

When drafting the 2025-2030 guidance on alcohol consumption, we encourage USDA and HHS to focus on increasing understanding of the connection between low and moderate alcohol

consumption and increased cancer risk. Recent sources of public health guidance on alcohol consumption and health, including the US Surgeon General's [Advisory](#) issued in January 2025, note that there is limited awareness of this association among Americans. As a longstanding source of education and guidance for the public, the Dietary Guidelines can play a vital role in improving awareness of the increased cancer risk associated with alcohol use.

H. Jean Wright II, PsyD  
Executive Deputy Commissioner for Mental Hygiene  
New York City Department of Health and Mental Hygiene