



December 23, 2020

Vivek Murthy, M.D.
Nominee for U.S. Surgeon General

Dear Dr. Murthy:

We, the undersigned groups, write to welcome you back to the role of U.S. Surgeon General, and to request that you consult with federal agency partners to recommend updates to the health warning statement on alcoholic beverages to include a cancer warning. As highlighted in your 2016 report “Facing Addiction in America,” alcohol consumption is associated with various cancers.ⁱ Yet the public is critically uninformed about this risk. The Alcoholic Beverage Labeling Act of 1988 (ABLA) establishes a process for the Treasury Department’s Alcohol Tax and Trade Bureau (TTB), “in consultation with the Surgeon General,” to report to Congress on the need for updates to the health warning statement on alcoholic beverages if available scientific information would justify a change.ⁱⁱ The time has come for such a change, specifically, the addition of a warning statement on the link between alcohol and cancer. We write to ask that, as Surgeon General, you publish a report clearly explaining this link and providing TTB with the information it needs to recommend updates to the warning.

The current alcohol warning label states “GOVERNMENT WARNING: (1) According to the Surgeon General, women should not drink alcoholic beverages during pregnancy because of the risk of birth defects. (2) Consumption of alcoholic beverages impairs your ability to drive a car or operate machinery, and may cause health problems.”ⁱⁱⁱ This statement was written nearly three decades ago, before the completion of large prospective cohort studies and genetic research demonstrating that alcohol causes cancer. The vague statement “may cause health problems” so grossly understates alcohol’s health impacts as to be practically misleading. And the American people remain critically uninformed that alcohol consumption increases the risk of cancer.^{iv}

On October 21, 2020, a coalition of eight public health advocacy groups (including the undersigned groups) petitioned the TTB to recommend that Congress update the alcohol warning to reflect alcohol’s cancer risks.^v Today, we ask the Surgeon General to publish a report reviewing the evidence of the link between alcohol and cancer, as well as consumer understanding of alcohol’s risks, with recommendations for enhancing the efficacy of federal alcohol labeling requirements. Such a report will help to provide the TTB, Congress, and the public the information needed to update alcohol warning labels with the latest science on alcohol’s risks and effective risk-communication.

The following presents the evidence and rationale for requiring a cancer warning on alcohol products sold in the United States, and for rotating that warning message with existing warnings on drinking while pregnant and operating machinery.

1. New evidence establishing a causal link between alcohol and cancer has emerged since passage of the Alcoholic Beverage Labeling Act of 1988.

When Congress created the first health warning labeling requirements for alcohol by passing the Alcoholic Beverage Labeling Act of 1988 (ABLA), it relied primarily on Surgeon General Everett Koop's Report on Nutrition and Health, published that same year. Surgeon General Koop's report documented the well-established connection between alcohol and fetal birth defects and motor vehicle accidents.^{vi} The report made clear the need to add to alcoholic beverages warning labels that would inform the public of these risks, and Congress consequently adopted them.

Surgeon General Koop's report also noted that, while alcohol and smoking may work synergistically in the development of certain oral cancers, "[l]ess conclusive and somewhat conflicting evidence suggests a role of alcohol in other types of cancers such as those of the liver, rectum, breast, and pancreas."^{vii} The report noted that further research into "the mechanisms by which alcohol increases cancer risk" was a "special priority."^{viii} But given the inconclusive evidence at the time, Congress declined to adopt labeling requirements for cancer risks. However, Congress included in the ABLA the following provision to ensure the alcohol health warning would remain up-to-date:

If, after appropriate investigation and consultation with the Surgeon General [...] the Secretary [of the Treasury] finds that available scientific information would justify a change in, addition to, or deletion of [the existing warning statement], the Secretary shall promptly report such information to the Congress together with specific recommendations for such amendments.^{ix}

Sufficient information to justify the addition of a cancer warning statement is available today.

Numerous scientific authorities have acknowledged the strong evidence linking alcohol and cancer:

- The Scientific Report of the 2020 Dietary Guidelines Advisory Committee (DGAC) notes, "[A]lcohol is [...] likely causally associated with at least 7 types of cancer. For some common cancers (*e.g.*, breast cancer, colorectal cancer), an increased risk is observed starting with any consumption above zero and continues to increase with higher consumption amounts."^x
- The World Cancer Research Fund/American Institute for Cancer Research notes in its 2018 Continuous Update Project Expert Report, *Diet, Nutrition, Physical Activity and Cancer: a Global Perspective* that there is strong evidence that consumption of alcoholic drinks increases the risk of cancers of the mouth/pharynx/larynx, esophagus, liver, colorectum, breast (pre- and post-menopausal), and stomach.^{xi}
- The World Health Organization noted in its 2018 Global Status Report on Alcohol and Health that "[t]here is an established causal link between alcohol use and cancer development in the oropharynx, larynx, oesophagus, liver, colon, rectum and the female breast... Even moderate alcohol intake has been shown to increase the risk of developing female breast cancer."^{xii}
- The American Cancer Society advises in its Guidelines for Diet and Physical Activity for Cancer Prevention that, "it is best not to drink alcohol," and that "[p]eople who do choose to drink alcohol should limit their consumption to no more than 1 drink per day for women and 2 drinks per day for men," based on the strong evidence of a link between alcohol and cancer.^{xiii}
- The American Society of Clinical Oncology issued a statement on alcohol and cancer in 2017, noting that "the relationship between drinking alcohol and cancer risk has been evaluated extensively in epidemiologic case-control and cohort studies," and that "even modest use of alcohol may increase cancer risk."^{xiv}

It is clear that leading scientific authorities have reached consensus that alcohol causes cancer.

Some of these same scientific authorities also highlight the significant burden of preventable cancer cases and deaths attributable to alcohol consumption. The 2020 DGAC found that “alcohol consumption is responsible for approximately 3.5 to 5.5 percent of all cancer deaths in the United States.”^{xv} The American Cancer Society notes that alcohol consumption is the third largest contributor to cancer cases in women (50,110 deaths), and the fourth largest contributor to cancer cases in men (37,410 deaths).^{xvi} The Institute for Health Metrics and Evaluation’s Global Health Data Exchange estimates that in 2017, 10,387 U.S. deaths from colon and rectum cancer and 7,434 U.S. deaths from breast cancer were attributable to alcohol use.^{xvii}

2. Americans are not aware of the link between alcohol and cancer.

Despite the well-established link between alcohol and cancer, Americans remain critically unaware of this risk. A 2019 survey by the American Institute for Cancer Research found that only 45 percent of Americans identify alcohol as a cancer risk.^{xviii} A similar 2019 survey from the National Cancer Institute found that only 36 percent of U.S. adults identify cancer as a health condition that can result from drinking too much alcohol.^{xix}

3. Cancer warning labels on alcohol are increasingly common and can be used to increase awareness of the cancer risk of alcohol.

The link between alcohol and cancer has already led to warning labels in several other countries. South Korea’s labeling law requires warnings that include the statement: “Alcohol is [a] carcinogen.”^{xx} A pilot program in Canada’s Yukon territory required a warning, similar to the one proposed by our petition, that “[a]lcohol can cause cancer, including breast and colon cancers.”^{xxi} In Ireland, a recently enacted law will soon require “a warning that is intended to inform the public of the direct link between alcohol and fatal cancers” on all alcohol product labels and advertisements.^{xxii}

A quasi-experimental study conducted in Canada found that patrons who visited a liquor store in which alcohol containers were labeled with cancer warnings for one month had a 10 percent greater increase in knowledge of the link between alcohol and cancer two months following the intervention than patrons who visited a liquor store with no warning labels.^{xxiii} Survey studies exploring the impact of cancer warning labels on tobacco products have also found increased awareness of the link between smoking and cancer following the implementation of cancer warning labels.^{xxiv}

4. Rotating multiple health warning statements makes warning labels more effective.

Evidence from other labeling initiatives suggests benefits from rotating multiple health warning statements.^{xxv} Rotating a cancer warning with the existing warnings related to motor vehicle operation and drinking while pregnant could help prevent desensitization or the “wear out” effect, wherein consumers no longer take notice of a warning label. Researchers in the tobacco context have documented that a stock of rotating warnings, tailored to various groups, can be effective to counteract this “wear-out” effect.^{xxvi}

Rotating warnings can also help ensure that relevant messages reach the full range of consumers.^{xxvii} For example, some consumers, such as those with a family history of breast or colon cancer, will have much

greater interest in the new warning message proposed in this letter, whereas others (such as pregnant women) may find messages about drinking while pregnant more relevant. A review of health warning messages on tobacco products concluded that “Regulations that require a larger number of warnings to rotate on packages [...] allow for greater targeting of subgroups.”^{xxviii}

Recommendation

There is a significant mismatch between the strength of the emerging evidence on alcohol and health and Americans’ awareness of that evidence. We recommend that the Surgeon General issue a report reviewing the evidence on the connection between alcohol and cancer, and recommend updates to current labeling requirements to inform consumers of this risk.

Sincerely,

American Institute for Cancer Research
Center for Science in the Public Interest
Consumer Federation of America
U.S. Alcohol Policy Alliance

References

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- ^{ix} 27 U.S.C. § 217.
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