



*August 13, 2020*

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

**Re: Comments of the Glass Packaging Institute (GPI) for Docket FNS-2020-0015 – In Support of Maintaining Current Consumption Guidelines**

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On behalf of the Glass Packaging Institute (GPI), I am pleased to offer comments regarding recently released recommendations issued by the 2020 Dietary Guidelines Advisory Committee. GPI is the North American trade association for the glass food and beverage manufacturing companies, glass recycling, other partners and suppliers to the industry.

Our member companies produce and support the manufacture of nearly 25 billion glass bottles and jars each year, providing packaging for a wide variety of food, non-alcoholic, alcoholic beverages. Nearly 75% of these bottles are in support of the nation's beverage industry. Glass container manufacturing companies employ about 14,000 Americans in good paying, benefits-provided careers.

GPI and its member companies were very concerned to read that the Dietary Guidelines Advisory Committee recommended the federal government change longstanding guidance on moderate consumption of alcohol. For men, the recommendation would reduce by half the number of alcoholic drinks per day, from 2 to 1.

Health and diet concerns are of utmost importance to the beverage packaging industry, but any changes to the dietary guidelines need to be grounded in science and adhere to the regulatory protocols for making significant changes. For nearly 30 years, the Dietary Guidelines for Americans have defined moderate alcohol consumption as up to one drink per day for women and up to two drinks per day for men. The systematic review conducted supported continuation of the current consumption guidelines for alcohol, at the current levels.

The Committee's Beverages and Added Sugars Subcommittee recommendation to the report that would lower the number of alcoholic drinks for men from two to one per day directly contradicts the findings of the majority of studies reviewed. The Subcommittee did not also take into account the many health

related benefits associated with moderate alcohol consumption, in accordance with current consumption guidelines.

The Subcommittee's decision to reduce by half the moderate consumption guidelines for men is also out of scope of their responsibilities.

Please feel free to reach out to me with questions or to follow up, and thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Scott DeFife". The signature is written in a cursive style with a long horizontal stroke at the end.

Scott DeFife  
President