

April 15, 2021

The Honourable Patty Hajdu, P.C., M.P.
Minister of Health
Health Canada
Brooke Claxton Building, Tunney's Pasture
Ottawa, Ontario K1A 0K9
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Re: LRDG Project 2022

Dear Minister:

We are writing to you to express our concerns regarding [LRDG Project 2022](#), which has the mandate to review and update Canada's Low-Risk Drinking Guidelines (LRDGs). While a review and update may well be appropriate given that the LRDGs were first introduced a decade ago, it appears that the new guidelines expected to be released in March 2022 will not be a product of an impartial approach.

We have reached this conclusion based on:

- Public statements made by LRDGs panelists regarding the direction guideline limits should go well in advance of the end of the 16-month project.
- Demonstration of a particular anti-alcohol bias, as no LRDGs review members are health experts whose well-established research supports the benefits of moderate alcohol consumption for many populations.
- The launch of public consultations through a survey instrument that cannot adequately reflect the complexity and scientific nature of the issues at the core of the review.

The 2011 LRDGs were a landmark achievement, not only because of the stakeholder consensus, but also because they were truly national in scope, replacing the patchwork that existed across provinces and territories. They also were discussed by Federal, Provincial and Territorial Health Ministers at their November 2011 meeting, to be promoted in their respective jurisdictions, as appropriate.¹ The current review puts that pan-Canadian collaboration at risk.

It is increasingly apparent that the new drinking guidelines may not be properly informed or seek to provide balanced advice to Canadians to reduce harm. Rather, it would appear that the outcome will be impractically low limits and poorly targeted guidelines, which confuse harmful alcohol consumption with

¹ Canadian Centre on Substance Use and Addiction, News Release, November 25, 2011.

any alcohol consumption, artificially inflating the number of “problem” drinkers from those Canadians who choose to drink for enjoyment and sociability and do so responsibly.

This not only risks re-directing focus and limited resources from addressing the health impacts of excessive alcohol consumption, but also poses a negative economic impact on sectors working to recover from COVID-19, most notably the hospitality and restaurant businesses which employ some of the most vulnerable workers in Canadian society.

Canadians would have been better served if the launch of the consultation process included a discussion paper, as is typical in most consultations, allowing for substantive written responses from all stakeholders, including the public. This would allow for any assumptions or underlying policy proposals to be made visible. Instead, a multiple choice closed question survey (only a single open-ended question on whether there is anything else to share) was released, preventing stakeholders from providing substantive and relevant input.

Most notably, a LRDGs review process intended to exclude or minimize substantive input from key stakeholders is contrary to Canada’s long-standing policy approach, as set out in comments to the World Health Organization regarding the Global Alcohol Strategy Action Plan.² That submission acknowledges the economic, social and cultural role of alcohol, and recognizes the engagement of industry in reducing the harmful use of alcohol.

Full transparency requires not only a balanced review panel and a robust initial consultation, but also should allow for a suitable public comment period on any scientific report(s), like the open consultation process followed by the U.S. in its review of the Dietary Guidelines for Americans (DGA)³ That transparency revealed a selective and inconsistent approach in the scientific review of the drinking guidelines component of the DGA, which intended to support a pre-determined and unscientific conclusion.⁴ A robust and transparent process subsequently ensured that the final U.S. drinking guidelines were based on a preponderance of scientific evidence and medical knowledge.

A guest editorial appearing in *Drugs and Alcohol Today* is also relevant to the current LRDGs review, noting that an advocacy perspective taken by alcohol researchers is inherently in conflict with central basic research tenets - the task of researchers being to examine all positions consistently and critically – including their own, in support of more balanced and diverse public discourses.⁵

It is also incumbent upon alcohol researchers to better explain what is meant by risks, and to put those risks into a comparative context with other daily activities and lifestyle habits. A holistic lifestyle approach across a range of lifestyle factors also may provide more meaningful context.⁶

² Health Canada Submission to the World Health Organization, December 12, 2020.

³ Updating USDA and HHS Dietary Guidelines for Americans, [DGA Website](#).

⁴ Concerns detailed in Joint Submission from medical experts at the Harvard T.H. Chan School of Public Health, Harvard Medical School, Brigham and Women’s Hospital, August 10, 2020.

⁵ Uhl, Alfred et. al. Alcohol Policy and Evidence, *Drugs and Alcohol Today*, 21(1), 2021.

⁶ Li, Yanping et. al. The Impact of Healthy Lifestyle Factors on Life Expectancies in the US Population, *Circulation*, April 2018.

We believe that the Minister can play a role in ensuring credible, pragmatic guidelines that are relevant to Canadians, and that are derived from a balanced and transparent evidence-based process. We thank you for reviewing and considering our comments included herein.

Sincerely,



cc: Marie-Claude Bibeau, Minister of Agriculture and Agri-Food
François-Philippe Champagne, Minister of Innovation, Science and Industry
Rita Notarandrea, CEO, Canadian Centre on Substance Use and Addiction
Tahiya Bakht, Senior Advisor, Minister of Health
Madwa-Nika Cadet, Policy Advisor, Minister of Innovation, Science and Industry
Jeremy Gauthier, Director of Policy, Minister of Agriculture and Agri-Food
Warren Gould, Deputy Director, Food Industry Development, Agriculture and Agri-Food Canada
Sylvie Millette-LeDuc, Director, Food Industry Division, Agriculture and Agri-Food Canada
Kathryn Nowers, Director of Policy, Minister of Health
Alison Porter, Chief of Staff, Minister of Agriculture and Agri-Food
Sabina Saini, Chief of Staff, Minister of Health
Jennifer Saxe, Director General, Controlled Substances and Cannabis Branch, Health Canada