



A STUDY FRAUGHT WITH BIAS:
*How the Biden Administration's Alcohol Intake and Health Study
Tried to Undermine the 2025-2030 Dietary Guidelines for Americans*

104 STAT. 1034

PUBLIC LAW 101-445—OCT. 22, 1990

Public Law 101-445
101st Congress

An Act

Oct. 22, 1990
[H.R. 1608]

To strengthen national nutrition monitoring by requiring the Secretary of Agriculture and the Secretary of Health and Human Services to prepare and implement a ten-year plan to assess the dietary and nutritional status of the United States population, to support research on, and development of, nutrition monitoring, to foster national nutrition education, to establish dietary guidelines, and for other purposes.

*Be it enacted by the Senate and House of Representatives of
United States of America in Congress assembled,*

National
Nutrition
Monitoring and
Education Act of 1990

SECTION 1. SHORT TITLE.

Report Prepared by the House Committee on
Oversight and Government Reform Majority Staff

January 7, 2026

Executive Summary

The National Nutrition Monitoring and Related Research Act of 1990 directs the Secretary of Agriculture and the Secretary of Health and Human Services (HHS) to publish a report known as the Dietary Guidelines for Americans (Dietary Guidelines) every five years.¹ Notably, the law provides guidance on the Dietary Guidelines' relevance to federal agencies and that the Guidelines should be based on current and available scientific evidence.²

In April 2022, the Biden Administration authorized the Interagency Coordinating Committee on the Prevention of Underage Drinking (ICCPUD) to conduct an alcohol intake and health study (AIH).³ The AIH study was intended to examine the relationship between alcohol consumption and health outcomes.⁴ The Biden Administration intended for the results of this study to influence the 2025-2030 Dietary Guidelines,⁵ but Congress had already authorized the National Academies of Sciences, Engineering, and Medicine (NASEM) to study the relationship between alcohol consumption and negative health outcomes to inform the 2025-2030 Dietary Guidelines.⁶

Because of this duplicative effort, in April 2024, the Committee launched an investigation into the ICCPUD AIH study and requested documents and communications from the Biden Administration.⁷ In all, the Biden Administration provided just 31 pages of responsive documents.⁸ After months of noncompliance by the Biden Administration, the Committee subpoenaed HHS for the outstanding documents and communications.⁹ The Biden Administration ultimately failed to provide sufficient information to the Committee.

Under the Trump Administration, Secretary Kennedy provided the Committee with 82 pages of unredacted copies of internal documents and communications, including meeting minutes, shedding light on the biased nature of the Biden Administration study.¹⁰ Those

¹ National Nutrition Monitoring and Related Research Act of 1990, Pub. L. No. 101-445, § 301, 104 Stat. 1042-43 (1990) (codified at 7 U.S.C. § 5341).

² *Id.*

³ *Interagency Coordinating Committee on the Prevention of Underage Drinking (ICCPUD)*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last updated May 16, 2025); and *ICCPUD's Study on Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last updated May 16, 2025).

⁴ *ICCPUD's Study on Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last updated May 16, 2025).

⁵ *Id.*

⁶ Consolidated Appropriations Act of 2023, Pub. L. No. 117-328 § 772, 136 Stat. 4508 (Dec. 29, 2022).

⁷ Letter from James Comer, Chairman, H. Comm. on Oversight & Gov't Reform to Xavier Becerra, Sec'y of Health and Human Services (Apr. 4, 2024).

⁸ *See generally* HHS Document Productions dated June 28, 2024, August 22, 2024, September 19, 2024, October 15, 2024, November 27, 2024, and December 17, 2024, *on file with the Committee*; and *see* Letter from James Comer, Chairman, H. Comm. on Oversight & Gov't Reform to Xavier Becerra, Sec'y of Health and Human Services (Sept. 30, 2024).

⁹ Letter from Hon. James Comer, Chairman, H. Comm. on Oversight & Accountability to Hon. Xavier Becerra, Sec'y, U.S. Dep't of Health & Human Servs. (Sept. 30, 2024).

¹⁰ *See* HHS Document Production dated November 21, 2025, *on file with the Committee*.

documents and communications show evidence of strong bias in the AIH study’s main research group, the Scientific Review Panel (SRP), members’ backgrounds and in the AIH study’s research and review process.¹¹

The Committee’s investigation uncovered evidence that the Biden Administration’s ICCPUD AIH study was conducted in a manner inconsistent with federal law and was wastefully duplicative, raising outcome bias concerns, as Congress had already allocated \$1.3 million for the NASEM to study the relationship between alcohol consumption and negative health outcomes to inform the 2025-2030 Dietary Guidelines.¹² Congress affirmed twice that NASEM was to be the sole group to conduct a study on the relationship between alcohol use and health to inform the upcoming 2025-2030 Dietary Guidelines.¹³ ICCPUD has a limited authority to curb underage drinking, not inform the Dietary Guidelines.¹⁴

The ICCPUD AIH study group in fact was fraught with bias. All six study group members are anti-alcohol advocates who had conducted previous research linking negative health outcomes with alcohol.¹⁵ The evidence points to the AIH study group having a pre-determined goal—to publish a biased study that parroted a “Canadian model” conclusion that no amount of alcohol consumption is safe.¹⁶ The AIH study group then took active steps to conceal their study from Congress and the public.¹⁷

HHS and the U.S. Department of Agriculture (USDA) must be actively involved in the formation of the Dietary Guidelines through the statutory Dietary Guidelines Advisory Committee (DGAC) process, base the Dietary Guidelines on rigorous, sound, and objective scientific evidence, efficiently steward taxpayer dollars, and adhere to congressional intent. Based on our review, this investigation concludes that the ICCPUD AIH study was biased and inconsistent with Congress’ intent that the NASEM study be the basis for the 2025-2030 Dietary Guidelines as they relate to alcohol consumption. The Committee concludes that the ICCPUD AIH study is irretrievably flawed and should not be considered in the 2025-2030 Dietary Guidelines.

¹¹ *Id.*

¹² See Consolidated Appropriations Act of 2023, Pub. L. No. 117-328 § 772, 136 Stat. 4508 (Dec. 29, 2022).

¹³ Continuing Appropriations and Extensions Act, 2025, Pub. L. No. 118-83, § 101, 138 Stat. 1525 (Sept. 26, 2024); and Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extensions Act, 2026, Pub. L. No. 119-37, § 759, H.R. 5371—59 (Nov. 15, 2025).

¹⁴ 42 U. S. C. § 290bb-25b.

¹⁵ See *Scientific Review Panel for Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last visited Dec. 16, 2025), available at <https://www.samhsa.gov/sites/default/files/iccpud-srp-aih-bios-2024.pdf>.

¹⁶ See HHS Document Production dated November 21, 2025, *on file with the Committee*; and see CANADA’S GUIDANCE ON ALCOHOL AND HEALTH: FINAL REPORT, CANADIAN CENTRE ON SUBSTANCE USE AND ADDICTION (Jan. 2023).

¹⁷ See HHS Document Production dated November 21, 2025, *on file with the Committee*

Table of Contents

Executive Summary	2
Background	5
<i>The Committee’s Investigation</i>	5
<i>The ICCPUD Study is Contrary to Federal Law</i>	7
Factual Findings.....	10
A. A Study Group with Biased Members, Processes and Deceptive Practices	10
<i>Biased ICCPUD Study Group Membership</i>	10
<i>The ICCPUD Study was Based on a “Canadian model”</i>	14
B. Deception and Attempts to hide the Findings of the ICCPUD Study from Congress and the Public	14
<i>Deceptive ICCPUD Study Group Practices</i>	17
<i>Premature Release of ICCPUD Study findings</i>	18
Conclusion	19

Background

In April 2024, during the 118th Congress, the Committee launched an investigation into the ICCPUD AIH study and requested documents and communications in the custody of then-HHS Secretary Xavier Becerra from the Biden Administration.¹⁸

The Committee's oversight of the ICCPUD AIH study is important to determine 1) whether relevant agencies have acted consistently with statutory provisions and 2) whether legislation is necessary to address the authority of federal agencies to remove certain topics of study from the purview of federal interagency advisory committees and delegate that authority to a subagency or working group that would not otherwise be subject to the Federal Advisory Committee Act (FACA).¹⁹ Potential legislation could explore adding guardrails to FACA to prevent agencies from subverting the transparency built into federal advisory committees and congressional oversight into the development of federal recommendations, policies, and regulations.²⁰ Additional oversight safeguards could help to prevent agencies from developing duplicative studies, like the ICCPUD AIH study, that are a waste of taxpayer dollars.²¹

The Committee's Investigation

The Committee requested Secretary Xavier Becerra, under the Biden Administration, produce documents in its original request dated April 4, 2024²², and in follow-up communications initiated by Committee staff on April 11, April 23, May 14, June 3, June 24, July 23, and August 8, 2024.²³ In the five months following the Committee's initial request, the Biden Administration HHS provided just 20 pages of responsive documents.²⁴ The final Biden Administration production contained no responsive documents.²⁵ In all, the Biden Administration's HHS provided 31 pages of documents that were responsive to the Committee's requests out of the 2,561 pages of documents HHS produced in all.²⁶ During the time since the

¹⁸ Letter from James Comer, Chairman, H. Comm. on Oversight & Gov't Reform to Xavier Becerra, Sec'y of Health and Human Services (Apr. 4, 2024).

¹⁹ Federal Advisory Committee Act, Pub. L. No. 92-463, 86 Stat. 770 (Oct. 6, 1972).

²⁰ See Federal Advisory Committee Act, Pub. L. No. 92-463, 86 Stat. 770 (Oct. 6, 1972).

²¹ Esther Mobley, *Will Congress force this controversial alcohol study to stop*, SAN FRANCISCO CHRONICLE (Oct. 17, 2024).

²² Letter from James Comer, Chairman, H. Comm. on Oversight & Gov't Reform to Xavier Becerra, Sec'y of Health and Human Services (Apr. 4, 2024).

²³ Email from H. Comm. on Oversight & Gov't Reform Majority staff to HHS Staff, *on file with the Committee*.

²⁴ See HHS Document Productions dated June 28, 2024, August 22, 2024, September 19, 2024, October 15, 2024, November 27, 2024, *on file with the Committee*.

²⁵ See HHS Production dated December 17, 2024, *on file with the Committee*.

²⁶ See generally HHS Document Productions dated June 28, 2024, August 22, 2024, September 19, 2024, October 15, 2024, November 27, 2024, and December 17, 2024, *on file with the Committee*; and see Letter from James Comer, Chairman, H. Comm. on Oversight & Gov't Reform to Xavier Becerra, Sec'y of Health and Human Services (Sept. 30, 2024).

Committee's original request, ICCPUD continued its work on the AIH study and collected public feedback on its proposed study methodology as well.²⁷

After several Committee requests to obtain the necessary information related to the AIH study,²⁸ it became clear that the Biden Administration was obstructing the Committee's request for information and evading the Committee's oversight efforts by limiting production to mostly documents already publicly available.²⁹ After months of noncompliance, the Committee subpoenaed outstanding documents and communications from HHS.³⁰ Despite having received a duly-authorized subpoena, the Biden Administration stalled its response during its remaining time in office and failed to provide sufficient information to the Committee.

After President Trump took office, the Committee tried again to get the necessary documents and communications about the ICCPUD AIH study from HHS.³¹ The Trump Administration provided the Committee with 525 pages of redacted documents and communications.³² While the Administration could not provide the Committee with unredacted copies of the entire production, HHS invited Committee staff to conduct an in-camera review of the unredacted versions of the documents they provided the Committee.³³ Based on this in-camera review, Committee staff identified several documents and made a follow-up request to HHS for the unredacted versions of these documents.³⁴ HHS provided the Committee with unredacted versions of all requested documents on November 21.³⁵

Under the Trump Administration, Secretary Kennedy provided the Committee with unredacted copies of internal documents and communications, including meeting minutes, shedding light on the biased nature of the Biden Administration study.³⁶ Internal documents and communications show evidence of strong bias in the ICCPUD AIH study's group members and in the study's research and review process.³⁷

²⁷ The Interagency Coordination Committee on the Prevention of Underage Drinking Requests for Public Comments, 89 Fed. Reg. 55,274 (Jul. 3, 2024).

²⁸ Letter from James Comer, Chairman, H. Comm. on Oversight & Gov't Reform to Xavier Becerra, Sec'y of Health and Human Services (Sept. 5, 2024).

²⁹ See generally HHS Document Productions dated June 28, 2024, August 22, 2024, September 19, 2024, October 15, 2024, November 27, 2024, and December 17, 2024, *on file with the Committee*.

³⁰ Letter from Hon. James Comer, Chairman, H. Comm. on Oversight & Accountability to Hon. Xavier Becerra, Sec'y, U.S. Dep't of Health & Human Servs. (Sept. 30, 2024).

³¹ Letter from Hon. James Comer, Chairman, H. Comm. on Oversight & Gov't Reform to Hon. Robert Kennedy, Jr., Sec'y, U.S. Dep't of Health & Human Servs. (Apr. 28, 2025).

³² See HHS Document Production dated July 29, 2025, *on file with the Committee*.

³³ This in-camera review took place at HHS Headquarters on Sept. 25, 2025.

³⁴ See Email from H. Comm. on Oversight & Gov't Reform Majority staff to HHS Staff (Sept. 25, 2025), *on file with the Committee*.

³⁵ See HHS Document Production dated November 21, 2025, *on file with the Committee*.

³⁶ *Id.*

³⁷ *Id.*

The ICCPUD Study is Contrary to Federal Law

The ICCPUD AIH study was conducted inconsistently with federal law and was wastefully duplicative, as Congress had already allocated \$1.3 million for NASEM to study the relationship between alcohol consumption and negative health outcomes such as cancer, diabetes, obesity, and heart disease to inform the 2025-2030 Dietary Guidelines.³⁸ Moreover, the same appropriations legislation allocating those funds and the National Nutrition Monitoring Act require the Dietary Guidelines to be “based on the preponderance of the scientific and medical knowledge which is current at the time the report is prepared” and specify that the HHS and USDA Secretaries, not a subagency, must approve of any guidance, including studies or other information consulted, if it will be considered in the Dietary Guidelines process.³⁹

Shortly after the Biden Administration authorized the ICCPUD AIH study, HHS published a notice in the Federal Register containing the scientific questions that the 2025-2030 Dietary Guidelines Advisory Committee (DGAC) would consider in creating the next version of the Dietary Guidelines.⁴⁰ Unlike the DGAC, which falls under the transparency requirements of FACA, ICCPUD does not publish information or provide access to its meeting materials,⁴¹ frustrating the transparency and oversight typical of previous iterations of the Dietary Guidelines.⁴²

While preparing the 2020 Dietary Guidelines, DGAC failed to complete its review of alcohol and its effect on health outcomes and only answered one of its research questions

³⁸ See Consolidated Appropriations Act of 2023, Pub. L. No. 117-328 § 772, 136 Stat. 4508 (Dec. 29, 2022). (“SEC. 772. For an additional amount for the “Office of the Secretary”, \$1,300,000, to remain available until expended, for the Secretary, in consultation with the Secretary of the Department of Health and Human Services, to enter into an agreement with the National Academies of Sciences, Engineering, and Medicine to conduct a study of the eight topics and scientific questions related to alcohol previously published by USDA and HHS and other relevant topics: Provided, That the panel or panels established by the National Academies Sciences, Engineering, and Medicine to conduct the study shall operate in a fully transparent manner and include a balanced representation of individuals who have expertise in the health effects of alcohol consumption, are unbiased, and are free from conflicts of interests: Provided further, That the findings and recommendations of the study shall be based on the preponderance of the scientific and medical knowledge consistent with section 5341 of title 7 of United States Code: Provided further, That not later than eighteen months after the date of enactment of this Act, the National Academies of Sciences, Engineering, and Medicine shall submit its report to the Secretary of Agriculture, the Secretary of Health and Human Services, and the Congress of its systematic review and data analysis of the eight research topics: Provided further, That the Secretary of Agriculture shall ensure that the 2025 Dietary Guidelines for Americans process includes a recommendation for alcohol and shall be based on the preponderance of scientific and medical knowledge consistent with section 5341 of title 7 of United States Code: Provided further, That the Secretary of Agriculture shall ensure the process is fully transparent and includes a balanced representation of individuals who are unbiased and free from conflicts of interest.”).

³⁹ See National Nutrition Monitoring and Related Research Act of 1990, Pub. L. No. 110-445 § 301, 104 Stat. 1042 (Oct. 22, 1990).

⁴⁰ Request for Comments on Scientific Questions To Be Examined To Support the Development of the Dietary Guidelines for Americans, 2025-2030, 87 Fed. Reg. 22540 (Apr. 15, 2022).

⁴¹ See generally HHS Document Productions dated June 28, 2024, August 22, 2024, September 19, 2024, October 15, 2024, November 27, 2024, and December 17, 2024, on file with the Committee.

⁴² See *Previous Editions of the Dietary Guidelines for Americans*, DIETARY GUIDELINES FOR AMERICANS (last visited Dec. 16, 2025), available at <https://www.dietaryguidelines.gov/about-dietary-guidelines/previous-editions>.

concerning the use of alcohol and all causes of death.⁴³ As a result, Congress directed NASEM to study the relationship between alcohol consumption and all types of health outcomes, including to all causes of death, for the 2025-2030 Dietary Guidelines.⁴⁴ Congress also mandated that NASEM evaluate the entire process used to develop the Dietary Guidelines, including how the advisory committee selection process could be improved to be more transparent, eliminate biases, and include committee members with a range of viewpoints.⁴⁵

Congress reaffirmed its intent to have NASEM conduct the study on alcohol consumption and health outcomes to inform the 2025-2030 Dietary Guidelines in Section 773 of the Consolidated Appropriations Act of 2024.⁴⁶ In that law, Congress directed the Secretaries of the USDA and HHS to “consider the findings and recommendations of the NASEM report in the development of the 2025 Dietary Guidelines for Americans” and clarified that the 2025-2030 Dietary Guidelines “shall be based on the preponderance of scientific and medical knowledge consistent with section 5341 of Title 7 of United States Code.”⁴⁷ Congress chose to extend the same language from FY 2024 through FY 2025 as well.⁴⁸ Congress reaffirmed in the FY 2026 continuing resolutions that the NASEM study should be the only alcohol-related study used to inform the 2025-2030 Dietary Guidelines.⁴⁹

⁴³ See Roni Caryn Robin, *Scientists in Discredited Alcohol Study Will Not Advise U.S. on Drinking Guidelines*, THE N.Y. TIMES (Dec. 1, 2023).

⁴⁴ See Consolidated Appropriations Act of 2023, Pub. L. No. 117-328 § 772, 136 Stat. 4508 (Dec. 29, 2022).

⁴⁵ See Consolidated Appropriations Act, 2016, Pub. L. No. 114-113, § 735, 129 Stat. 2280 (Dec. 18, 2015). (“SEC. 735. (a) Not later than 30 days after the date of the enactment of this Act, the Secretary of Agriculture shall engage the National Academy of Medicine to conduct a comprehensive study of the entire process used to establish the Advisory Committee for the Dietary Guidelines for Americans and the subsequent development of the Dietary Guidelines for Americans, most recently revised pursuant to section 301 of the National Nutrition Monitoring and Related Research Act of 1990 (7 U.S.C. 5341). The panel of the National Academy of Medicine selected to conduct the study shall include a balanced representation of individuals with broad experiences and viewpoints regarding nutritional and dietary information.”).

⁴⁶ See Consolidated Appropriations Act of 2024, Pub. L. No. 118-42 § 773, 138 Stat. 116 (Mar. 9, 2024). (“SEC. 773. The National Academies of Sciences, Engineering and Medicine (NASEM) were tasked with providing findings and recommendations on alcohol consumption for the purposes of inclusion in the 2025 Dietary Guidelines for Americans as required by Section 772 of Division A of the Consolidated Appropriations Act, 2023 (Public Law 117-328): Provided, That the Secretary of Health and Human Services and the Secretary of Agriculture shall consider the findings and recommendations of the NASEM report in the development of the 2025 Dietary Guidelines for Americans and further, both Secretaries shall ensure that the alcohol consumption recommendations in the 2025 Dietary Guidelines for Americans shall be based on the preponderance of scientific and medical knowledge consistent with section 5341 of title 7 of United States Code.”).

⁴⁷ *Id.*

⁴⁸ See Continuing Appropriations and Extensions Act, 2025, Pub. L. No. 118-83, § 101, 138 Stat. 1525 (Sept. 26, 2024). (“SEC. 101. Such amounts as may be necessary, at a rate for operations as provided in the applicable appropriations Acts for fiscal year 2024 and under the authority and conditions provided in such Acts, for continuing projects or activities (including the costs of direct loans and loan guarantees) that are not otherwise specifically provided for in this Act, that were conducted in fiscal year 2024, and for which appropriations, funds, or other authority were made available in the following appropriations Acts: (1) The Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2024 (division B of Public Law 118-42).”).

⁴⁹ See Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extensions Act, 2026, Pub. L. No. 119-37, § 759, H.R. 5371—59 (Nov. 15, 2025). (“SEC. 759. The National Academies of Sciences, Engineering and Medicine (NASEM) were tasked with providing findings and

During NASEM’s Review of Evidence on Alcohol and Health committee meeting in January of 2024, an ICCPUD representative presented documents that reflected SAMHSA’s intent to study on its own the relationship between alcohol consumption and all causes of death and use its own findings to inform the 2025-2030 Dietary Guidelines.⁵⁰

By ignoring Congress’s instructions in applicable appropriations legislation and authorizing its own duplicative study through SAMHSA to inform the 2025-2030 Dietary Guidelines, the Biden Administration ignored Congressional intent and violated federal law.⁵¹ The Biden Administration also acted contrary to federal law by allowing ICCPUD to conduct the AIH study with biased committee members and research processes on a report that would not be “based on the preponderance of the scientific and medical knowledge” current at the time of the 2025-2030 Dietary Guidelines.⁵² It also appears that the ICCPUD AIH study, despite NASEM’s twice-affirmed sole congressional mandate to study the relationship between alcohol use and health for the Dietary Guidelines⁵³ and ICCPUD’s limited authority simply to curb underage drinking⁵⁴, reflected an attempt to remove alcohol review from the DGAC process and illegally delegate that authority to ICCPUD.⁵⁵

recommendations on alcohol consumption for the purposes of inclusion in the 2025 Dietary Guidelines for Americans as required by section 772 of division A of the Consolidated Appropriations Act, 2023 (Public Law 117–328): Provided, That the Secretary of Health and Human Services and the Secretary of Agriculture ***shall only consider the findings and recommendations of the NASEM report in the development of the 2025 Dietary Guidelines for Americans*** and further, both Secretaries shall ensure that the alcohol consumption recommendations in the 2025 Dietary Guidelines for Americans shall be based on the preponderance of scientific and medical knowledge consistent with section 5341 of title 7 of United States Code.”) (emphasis added).

⁵⁰ *Review of Evidence on Alcohol and Health*, NAT’L ACADEMIES OF SCI., ENG’G, & MED. (Jan. 25-26, 2024), available at <https://www.nationalacademies.org/projects/HMD-FNB-23-06>, at 6-7.

⁵¹ See Consolidated Appropriations Act of 2023, Pub. L. No. 117-328 § 772, 136 Stat. 4508 (Dec. 29, 2022); Consolidated Appropriations Act of 2024, Pub. L. No. 118-42 § 773 (Mar. 9, 2024).

⁵² See National Nutrition Monitoring and Related Research Act of 1990, Pub. L. No. 110-445 § 301, 104 Stat. 1042 (Oct. 22, 1990).

⁵³ See Consolidated Appropriations Act of 2023, Pub. L. No. 117-328 § 772, 136 Stat. 4508 (Dec. 29, 2022); Consolidated Appropriations Act of 2024, Pub. L. No. 118-42 § 773, 138 Stat. 116 (Mar. 9, 2024).

⁵⁴ 42 U. S. C. § 290bb-25b.

⁵⁵ See National Nutrition Monitoring and Related Research Act of 1990, Pub. L. No. 110-445 § 301, 104 Stat. 1042 (Oct. 22, 1990).

Factual Findings

As discussed above, after nearly two years of document requests and a duly issued congressional subpoena, the Biden Administration failed to provide the requested information for the Committee’s investigation.⁵⁶ In November 2025, however, the Committee received from the Trump Administration HHS unredacted copies of internal documents, including meeting minutes, that provided insight on decisions made in the course of developing the AIH study.⁵⁷ These documents revealed internal communications among those involved in the ICCPUD Technical Review Subcommittee and the ICCPUD main study group in the development and creation of the AIH study.⁵⁸ After reviewing that information, the investigation uncovered insights into why the Biden Administration refused to provide this information to the Committee and ignored a duly issued Congressional subpoena.

A. A Study Group with Biased Members, Processes and Deceptive Practices

Biased ICCPUD Study Group Membership

The entire ICCPUD AIH study group was fraught with biases. All six members of the Scientific Review Panel chosen to conduct the study are affiliated with U.S. and international anti-alcohol advocacy groups.⁵⁹ After reviewing the internal documents and communications from HHS, the Committee is deeply concerned the AIH study group had a pre-determined goal—to publish a biased study that concluded under a “Canadian model” that no amount of alcohol consumption is safe by recruiting scientists who would develop the research that supported that conclusion.⁶⁰

Alicia Sparks, a long-time anti-alcohol activist and board member of the anti-alcohol U.S. Alcohol Policy Alliance, now a senior principal with Synergy Enterprises, Inc., was largely responsible for selecting the members of the biased study group.⁶¹ Synergy Enterprises, Inc. had

⁵⁶ See Letter from James Comer, Chairman, H. Comm. on Oversight & Gov’t Reform to Xavier Becerra, Sec’y of Health and Human Services (Apr. 4, 2024); Letter from James Comer, Chairman, H. Comm. on Oversight & Gov’t Reform to Xavier Becerra, Sec’y of Health and Human Services (Sept. 5, 2024); and Letter from Hon. James Comer, Chairman, H. Comm. on Oversight & Accountability to Hon. Xavier Becerra, Sec’y, U.S. Dep’t of Health & Human Servs. (Sept. 30, 2024).

⁵⁷ HHS Document Production Dated November 21, 2025, *on file with the Committee*.

⁵⁸ *Id.*

⁵⁹ *Scientific Review Panel for Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last visited Dec. 16, 2025), *available at* <https://www.samhsa.gov/sites/default/files/iccpud-srp-aih-bios-2024.pdf>.

⁶⁰ See CANADA’S GUIDANCE ON ALCOHOL AND HEALTH: FINAL REPORT, CANADIAN CENTRE ON SUBSTANCE USE AND ADDICTION (Jan. 2023).

⁶¹ *Alicia Sparks*, U.S. ALCOHOL POLICY ALLIANCE (last visited Dec. 16, 2025), *available at* <https://www.alcoholpolicy.org/board-of-directors/alicia-sparks>.

contracts with HHS worth up to \$10.4 million going back to 2017 for ICCPUD-related work, specifically focusing on professional, scientific, and technical services, including advertising and public relations.⁶² The membership of the ICCPUD AIH study group was indicative of the goal of the study: begin with a pre-determined conclusion that no amount of alcohol consumption is safe and recruit biased scientists to develop the research to support that conclusion. The Biden Administration sought to accomplish this goal by appointing three Canadians and three Americans, all of whom were anti-alcohol advocates, as evident in their research.⁶³

The “experts” chosen to serve on the Scientific Review Panel to conduct the AIH study were all anti-alcohol advocates, half of whom reside outside of the United States.

1. **Dr. Kevin Shield** – Toronto, Canada

Dr. Shield is an “Independent Scientist” from the Institute for Mental Health Policy Research and Head of the World Health Organization/Pan American Health Organization (PAHO) Collaborating Centre in Addiction and Mental Health Centre for Addiction and Mental Health in Toronto, Canada.⁶⁴ Dr. Shield’s research has focused on finding a link between alcohol consumption and death.⁶⁵ Dr. Shield was one of the lead researchers for the controversial Canadian drinking guidelines released in 2023 that concluded that no amount of alcohol consumption was safe.⁶⁶ At the World Health Organization (WHO), Dr. Shield led the initiative to update WHO’s stance on alcohol consumption. Not surprisingly, WHO later concluded that “there is no safe amount [of alcohol consumption].”⁶⁷

2. **Dr. Timothy Naimi** – Victoria, Canada

Dr. Naimi is the Director of the Canadian Institute for Substance Use Research at the University of Victoria.⁶⁸ Dr. Naimi’s research focuses on the impact of “alcohol control policies” on how the government decides to regulate the lives of citizens.⁶⁹ Dr. Naimi was also supposed to lead the review of alcohol for the 2020 Dietary Guidelines but was reported to have caused that project to be derailed by failing to complete the proper

⁶² *Award Profile, Contract Summary: Synergy Enterprises, Inc.*, USASPENDING.GOV (last visited Dec. 16, 2025), available at https://www.usaspending.gov/award/CONT_AWD_HHSS277201700001C_7522_-NONE_-NONE-.

⁶³ *Scientific Review Panel for Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last visited Dec. 16, 2025), available at <https://www.samhsa.gov/sites/default/files/iccpud-srp-aih-bios-2024.pdf>.

⁶⁴ *Id.*

⁶⁵ *Id.*

⁶⁶ *See CANADA’S GUIDANCE ON ALCOHOL AND HEALTH: FINAL REPORT*, CANADIAN CENTRE ON SUBSTANCE USE AND ADDICTION (Jan. 2023).

⁶⁷ News Release, World Health Organization, No level of alcohol consumption is safe for our health (Jan. 4, 2023).

⁶⁸ *Scientific Review Panel for Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last visited Dec. 16, 2025), available at <https://www.samhsa.gov/sites/default/files/iccpud-srp-aih-bios-2024.pdf>.

⁶⁹ *Id.*

protocol for the alcohol research questions.⁷⁰ Dr. Naimi was also involved in developing Canada’s controversial “Canadian model” no-safe-level drinking guidelines in 2023.⁷¹

3. **Dr. Jürgen Rehm** – Toronto, Canada

Dr. Rehm is the Senior Scientist at the Institute for Mental Health Policy Research and Campbell Family Mental Health Research Institute Centre for Addiction and Mental Health in Toronto, Canada.⁷² Dr. Rehm specializes in reviewing the “inequalities” in policies to help reduce substance abuse.⁷³ While Dr. Rehm was not on the research team directly involved in developing the 2023 “Canadian model” no-safe-level drinking guidelines, Dr. Rehm’s work was cited over 20 times in the report containing those guidelines.⁷⁴

4. **Dr. Pricilla Martinez** - Berkeley, California

Dr. Martinez is a scientist with the Alcohol Research Group based out of Berkeley, California.⁷⁵ Dr. Martinez’s research focuses on “alcohol-related racial/ethnic health disparities in the U.S.”⁷⁶ In 2020, Dr. Martinez argued that “there is no safe level” of alcohol use.⁷⁷

5. **Dr. Katherine Keyes** – New York, New York

Dr. Keyes is a Professor of Epidemiology at Columbia University.⁷⁸ Dr. Keyes’ research focuses on the “cross-generational cohort effects on substance use” to inform “policy interventions.”⁷⁹ Dr. Keyes has been quoted as saying “[T]here is no safe amount [of

⁷⁰ See DIETARY GUIDELINES FOR AMERICANS: 2020-2025, U.S. DEP’T OF AGRIC. & U.S. DEP’T OF HEALTH & HUMAN SERVS. (Dec. 2020).

⁷¹ See CANADA’S GUIDANCE ON ALCOHOL AND HEALTH: FINAL REPORT, CANADIAN CENTRE ON SUBSTANCE USE AND ADDICTION (Jan. 2023).

⁷² *Scientific Review Panel for Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last visited Dec. 16, 2025), available at <https://www.samhsa.gov/sites/default/files/iccpud-srp-aih-bios-2024.pdf>.

⁷³ *Id.*

⁷⁴ See CANADA’S GUIDANCE ON ALCOHOL AND HEALTH: FINAL REPORT, CANADIAN CENTRE ON SUBSTANCE USE AND ADDICTION (Jan. 2023).

⁷⁵ *Scientific Review Panel for Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last visited Dec. 16, 2025), available at <https://www.samhsa.gov/sites/default/files/iccpud-srp-aih-bios-2024.pdf>.

⁷⁶ *Id.*

⁷⁷ *Alcohol Causes Breast Cancer Project Wraps Up Data Collection*, ALCOHOL RSCH. GRP. (Nov. 12, 2020).

⁷⁸ *Scientific Review Panel for Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last visited Dec. 16, 2025), available at <https://www.samhsa.gov/sites/default/files/iccpud-srp-aih-bios-2024.pdf>.

⁷⁹ *Id.*

alcohol].”⁸⁰ Dr. Keyes has also attempted to dismiss several previous studies suggesting “people who drank moderately had a lower risk of premature death.”⁸¹

6. **Dr. Adam Milam** – Phoenix, Arizona

Dr. Milam is the Senior Associate Consultant of the Department of Anesthesiology and Perioperative Medicine at the Mayo Clinic.⁸² Dr. Milam’s research focuses on “environmental determinants” of public health outcomes and “health data disparities.”⁸³ Dr. Milam co-authored a study that concluded that local businesses that serve or sell alcohol should be closed off from residential areas.⁸⁴ Dr. Milam’s research was used to re-write Baltimore City zoning code, pushing small business owners who sell alcohol out of the area.⁸⁵

A review of the ICCPUD AIH study group membership shows all six selected members were anti-alcohol advocates with beliefs predating the study that no amount of alcohol consumption is safe, contrary to several accepted studies in the field.⁸⁶ Congress made clear in the 2016 Appropriations Act that NASEM must include “a balanced representation of individuals with broad experiences and viewpoints regarding nutritional and dietary information” in the study to inform the Dietary Guidelines.⁸⁷ Here, the ICCPUD AIH group included three individuals from Canada whose research backgrounds show a dedication to eliminating the use of alcohol through dietary guidelines and a belief that no amount of alcohol consumption is safe.⁸⁸ The other three ICCPUD group members from the United States are academics who have strong anti-alcohol beliefs, as evidenced by their research, publications and published statements.⁸⁹

⁸⁰ Linda Carroll, *Very few Americans know drinking alcohol increases cancer risk, study finds*, TODAY (Dec. 1, 2022).

⁸¹ *Id.*

⁸² *Scientific Review Panel for Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last visited Dec. 16, 2025), available at <https://www.samhsa.gov/sites/default/files/iccpud-srp-aih-bios-2024.pdf>.

⁸³ *Id.*

⁸⁴ Pamela J. Trangenstein, *et al.*, *The Violence Prevention Potential of Reducing Outlet Access in Baltimore, Maryland*, 81 J. OF STUDIES ON ALCOHOL AND DRUGS 1 (Jan. 2020).

⁸⁵ C Debra M Furr-Holden, *et al.*, *Using Zoning as a Public Health Tool to Reduce Alcohol Outlet Oversaturation, Promote Compliance, and Guide Future Enforcement: a Preliminary Analysis of Transform Baltimore*, J. OF URBAN HEALTH (July 2020).

⁸⁶ See, e.g., Bo Xi, *et al.*, *Relationship of Alcohol Consumption to All-Cause, Cardiovascular, and Cancer-Related Mortality in U.S. Adults*, 70 J. OF THE AM. COLL. OF CARDIOLOGY 8 (Aug 22, 2017).

⁸⁷ See Consolidated Appropriations Act, 2016, Pub. L. No. 114-113, § 735, 129 Stat. 2280 (Dec. 18, 2015).

⁸⁸ *Scientific Review Panel for Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last visited Dec. 16, 2025), available at <https://www.samhsa.gov/sites/default/files/iccpud-srp-aih-bios-2024.pdf>.

⁸⁹ *Id.*

The ICCPUD Study was Based on a “Canadian model”

In January 2023, a group of researchers from the Canadian Centre on Substance and Addiction released Canada’s Guidance on Alcohol and Health: Final Report.⁹⁰ This study focused on the risk associated with consuming any amount of alcohol and concluded that no amount of alcohol is safe, notably a new stance from previous studies on alcohol consumption.⁹¹

All three Canadian members of the ICCPUD study group were affiliated with creating the “Canadian model” study that concluded that no amount of alcohol consumption was safe.⁹² Both Dr. Kevin Shield and Dr. Timothy Naimi were authors and lead researchers for this study.⁹³ Dr. Jürgen Rehm’s work was cited over 20 times in the “Canadian model” report.⁹⁴ It is clear that the Biden Administration’s goal for the ICCPUD AIH study was to conclude under the “Canadian model” that no amount of alcohol consumption is safe. Therefore, the Biden Administration recruited two researchers who directly developed the “Canadian model” and one whose previous research was a substantial source in creating the “Canadian model” for the ICCPUD AIH study.

B. Deception and Attempts to hide the Findings of the ICCPUD Study from Congress and the Public

Based on the Committee’s review of the internal documents and communications provided by HHS, it is clear the ICCPUD had a predetermined goal: recruit biased researchers who were anti-alcohol advocates and believed in the “Canadian model” that no amount of alcohol was safe.⁹⁵ Then, ICCPUD hid this information from Freedom of Information (FOIA) requestors and Congress.⁹⁶ Not only were the actions of the ICCPUD AIH study group likely unethical, they were also contrary to federal law, since the FY 2026 Appropriations Act established that NASEM would be the **only** entity conducting an alcohol study to inform the 2025-2030 Dietary Guidelines.⁹⁷

⁹⁰ See CANADA’S GUIDANCE ON ALCOHOL AND HEALTH: FINAL REPORT, CANADIAN CENTRE ON SUBSTANCE USE AND ADDICTION (Jan. 2023).

⁹¹ *Id.*

⁹² *Id.*

⁹³ *Id.*

⁹⁴

⁹⁵ See *Scientific Review Panel for Alcohol Intake and Health*, SUBSTANCE ABUSE & MENTAL HEALTH SERVS. ADMIN. (last visited Dec. 16, 2025), available at <https://www.samhsa.gov/sites/default/files/iccpud-srp-aih-bios-2024.pdf>.

⁹⁶ See HHS Document Production dated November 21, 2025, *on file with the Committee*.

⁹⁷ See Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extensions Act, 2026, Pub. L. No. 119-37, § 759, H.R. 5371—59 (Nov. 15, 2025). (emphasis added).

Those involved in the ICCPUD AIH study planned to extend the findings of the AIH study to push a political agenda based on the “Canadian model” of a similar alcohol study concluding no amount of alcohol consumption was safe.

- The January 9, 2023, STOP Act Report to Congress internal meeting minutes provided by HHS state:
 - “Alicia [Sparks] is drafting a proposed approach to conducting the dietary guidelines research, under the assumption there are no additional resources available. **This process largely follows the Canadian model.**”⁹⁸

- Alicia sent the revised Comprehensive Plan back to COR with CDC’s edits. Madeline will add the new 2023 cover.

Task 7: Concept Facilitation, Staff Development, and Expert Consultants

- Alicia is drafting a proposed approach to conducting the dietary guidelines research, under the assumption there are no additional resources available. This process largely follows the Canadian model.
- The COR would like to see a discussion of potential communications options – these options can be scalable based on potential resources and may be recommendations to OASH or done through SAMHSA, resource dependent. The Canadian model may again be useful here.
- Alicia and Elaine will review the Communications piece as well as potential budgetary requirements needed.

Task 8: Meeting/Workshop Facilitation

- Principal’s meeting is being moved to February 2 and will be held 10:00-11:00 a.m. COR will let us know when he needs our team’s assistance with material revisions.

Miscellaneous

- There will be no meeting next Monday because of MLK Day.

- The February 6, 2023, STOP Act Report to Congress internal meeting minutes provided by HHS state:
 - “Nothing new on the dietary guidelines; we’re holding to see what NASEM does and to what extent SAMHSA is involved in the process.”
 - “Alicia has compiled a list of potential TEP members with bios.”
 - **“The plan is for ICCPUD to conduct risk modeling based on meta-analyses of alcohol-attributable deaths, similar to the Canadian model.”**⁹⁹

⁹⁸ See HHS Document Production dated November 21, 2025, *on file with the Committee*. (emphasis added).

⁹⁹ *Id.* (emphasis added).

Task 5: Web-based Questionnaire and Technical Support to States and DC

- Carol and Judy have begun an analysis of the 2022 survey responses/format for 2023 survey revisions.
- Carol will resend written survey documents (governor's letters, etc.) to the COR.

Task 6: Development of Analytic Papers

- N/A

Task 7: Concept Facilitation, Staff Development, and Expert Consultants

- Nothing new on the dietary guidelines; we're holding to see what NASEM does and to what extent SAMHSA is involved in the process.
- Alicia has compiled a list of potential TEP members with bios.
- The plan is for ICCPUD to conduct risk modeling based on meta-analyses of alcohol-attributable deaths, similar to the Canadian model.

- The March 13, 2023, STOP Act Report to Congress meeting minutes provided by HHS state:
 - "There's nothing new concerning the STOP Act team about the Dietary Guidelines. ICCPUD will do a review of alcohol attributable deaths, following the Canadian approach; this will be done concurrently with the NASEM review. The Dietary Guidelines recommendations should be finished by the end of 2024."¹⁰⁰

- Since the TTHY team has a Facebook page, we may want to share some information about the STOP Act reports on their page.

Task 6: Development of Analytic Papers

- The Comprehensive Plan was not voted on at the Principals meeting, so the COR is preparing an email to go out from OAS that will ask for a vote approval via email. That should happen this week.

Task 7: Concept Facilitation, Staff Development, and Expert Consultants

- There's nothing new concerning the STOP Act team about the Dietary Guidelines. ICCPUD will do a review of alcohol attributable deaths, following the Canadian approach; this will be done concurrently with the NASEM review. The Dietary Guidelines recommendations should be finished by the end of 2024.

Task 8: Meeting/Workshop Facilitation

- Madeline will look at past Principals meetings notes and match this year's meeting minutes to older versions. It will be important to distinguish Principals, designees, and invited guests in the minutes.

Miscellaneous

- N/A

¹⁰⁰ *Id.*

Deceptive ICCPUD Study Group Practices

The Committee found in internal communications and meeting minutes that those involved with the ICCPUD AIH study were intentionally hiding information from FOIA requestors and Congress by classifying documents as “pre-decisional and deliberative,” with no apparent regard for whether that was true.¹⁰¹

- The September 18, 2023, STOP Act Report to Congress meeting minutes provided by HHS state:
 - “Reminder that *all AI&H* [Alcohol Intake and Health] documents should contain a header/footer that says “pre-deliberative/decisional.”¹⁰²

Task 7: Concept Facilitation, Staff Development, and Expert Consultants

- AI&H page will be placed on the stopalcoholabuse.gov under the Resource & Research -> Data
 - Website will go live before midnight on Friday.
- Reminder that all AI&H documents should contain a header/footer that says “pre-deliberative/decisional.”

Task 8: Meeting/Workshop Facilitation

- The April 22, 2024 STOP Act Report to Congress meeting minutes provided by HHS state:
 - “All Alcohol Intake & Health (AIH) materials have been sent out. COR discussed including “pre-decisional and deliberative” to *all materials, not just AIH, to prevent the materials from falling under FOIA.*”¹⁰³

Task 6: Development of Analytic Papers

- All Alcohol Intake & Health (AIH) materials have been sent out. COR discussed including “predecisional and deliberative” to all materials, not just AIH, to prevent the materials from falling under FOIA.
 - Agencies have until Friday to review or request changes.
- The upcoming AIH meeting will be recorded. Alicia will introduce the SRP.
 - COR requested meeting minutes, so Dana and Alicia will take notes during the meeting. COR also requested a list of attendees and their associated agency.

¹⁰¹ *Id.* (emphasis added).

¹⁰² *Id.* (emphasis added).

¹⁰³ *Id.* (emphasis added).

Premature Release of ICCPUD Study findings

The Committee became aware that the ICCPUD AIH study group used an outside academic journal to prematurely release their predetermined “Canadian model” findings the group planned to include in the original Biden Administration study.¹⁰⁴

After the Committee’s investigation into the ICCPUD AIH study began in the spring of 2024, the ICCPUD study group submitted their pre-determined “Canadian model” findings to an outside academic medical journal called BMJ Open on September 5, 2024.¹⁰⁵ Rather than follow established protocol, the ICCPUD study group appeared to use their BMJ Open submission as a backdoor to submit their interim draft findings before it could be scrutinized by Congress and others.¹⁰⁶ While this article was not formally published by the ICCPUD study group, the exact same panelists authored the article published by BMJ Open in November 2025, with the help of one additional researcher.¹⁰⁷ The authors used almost identical data and reached very similar conclusions as the interim report.¹⁰⁸

The Committee did not become aware of this submission until after its publication in November 2025 because the Biden Administration did not notify the Committee of ICCPUD study group’s submission to BMJ Open. The Biden Administration HHS knew full well the Committee was actively investigating the ICCPUD AIH study at the time the findings were submitted to BMJ Open because Committee staff was in contact with HHS on April 11, April 23, May 14, June 3, June 24, July 23, and August 8, 2024¹⁰⁹ prior to the Chairman’s subpoena sent on September 30, 2024.¹¹⁰ It also appears that the Biden Administration did not adequately notify Trump Administration officials of this submission as HHS staff who the Committee staff met with after the BMJ Open article was released were not aware of this submission either.¹¹¹

The timing of the release of the interim ICCPUD AIH report in early January 2025, immediately before the Trump Administration took office, also underscores concern about a politicized timeline for the report that sought to remove or mitigate oversight by officials who did not share its pre-determined conclusions.¹¹²

¹⁰⁴ Kevin Shield, *et al.*, *Health impact of alcohol use in the USA: a protocol of a systematic review and modelling study*, 15 BMJ OPEN 11 (Nov. 26, 2025).

¹⁰⁵ *Id.*

¹⁰⁶ THE INTERAGENCY COORDINATION COMMITTEE ON THE PREVENTION OF UNDERAGE DRINKING, DRAFT REPORT: SCIENTIFIC FINDINGS OF THE ALCOHOL INTAKE & HEALTH STUDY FOR PUBLIC COMMENT (Jan. 2025).

¹⁰⁷ Kevin Shield, *et al.*, *Health impact of alcohol use in the USA: a protocol of a systematic review and modelling study*, 15 BMJ OPEN 11 (Nov. 26, 2025).

¹⁰⁸ *Id.*

¹⁰⁹ Email from H. Comm. on Oversight & Gov’t Reform Majority staff to HHS Staff, *on file with the Committee*.

¹¹⁰ Letter from Hon. James Comer, Chairman, H. Comm. on Oversight & Accountability to Hon. Xavier Becerra, Sec’y, U.S. Dep’t of Health & Human Servs. (Sept. 30, 2024).

¹¹¹ Meeting between H. Comm. on Oversight & Gov’t Reform Majority staff and HHS Staff (Dec. 18, 2025).

¹¹² THE INTERAGENCY COORDINATION COMMITTEE ON THE PREVENTION OF UNDERAGE DRINKING, DRAFT REPORT: SCIENTIFIC FINDINGS OF THE ALCOHOL INTAKE & HEALTH STUDY FOR PUBLIC COMMENT (Jan. 2025).

Conclusion

As HHS and USDA work to finalize the 2025-2030 Dietary Guidelines, it is imperative that Congress and the American people have the utmost confidence in the scientific support underlying the Dietary Guidelines. The National Nutrition Monitoring Act requires the Dietary Guidelines to be “based on the preponderance of the scientific and medical knowledge which is current at the time the report is prepared.”¹¹³

HHS and USDA must be actively involved in the formation of the Dietary Guidelines through the statutory Dietary Guidelines Advisory Committee (DGAC) process, base the Dietary Guidelines on rigorous, sound, and objective scientific evidence, efficiently steward taxpayer dollars, and adhere to congressional intent. Based on our review, HHS documents provided to the Committee show that the ICCPUD AIH study was deliberately biased by 1) recruiting anti-alcohol advocates who wanted to promote that no amount of alcohol consumption is safe by building upon previous research in their 2023 “Canadian model” study and 2) hiding relevant AIH study information from FOIA requestors and Congress.¹¹⁴ The ICCPUD AIH study is inconsistent with federal law because Congress stated in a FY 2026 appropriations bill that the NASEM study would be the only alcohol study to inform the 2025-2030 Dietary Guidelines.¹¹⁵ For these reasons, those who look to the federal government for dietary guidance would be best served if the ICCPUD AIH study is left in its interim draft form and not be considered in the 2025-2030 Dietary Guidelines.

¹¹³ National Nutrition Monitoring and Related Research Act of 1990, Pub. L. No. 110-445 § 301, 104 Stat. 1042 (Oct. 22, 1990).

¹¹⁴ See HHS Document Production dated November 21, 2025, *on file with the Committee*.

¹¹⁵ Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extensions Act, 2026, Pub. L. No. 119-37, § 759, H.R. 5371—59 (Nov. 15, 2025).