

Australian guidelines to reduce health risks from drinking alcohol Public consultation

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[NHMRC has removed personal information]

Overall comments

- 1) The document gives the consistent impression that drinking at risk levels is not harmful. One text example is on page 23 (5.2 Key info. Benefits and harms). "Drinking alcohol within this guideline has substantial net benefits, as opposed to drinking above it." This is a very positive statement, vague, doesn't stand alone, ambiguous, needs re-writing.
- 2) The document is too long and seems repetitive because it is poorly structured and needs substantial editing.
- 3) The boxed information under "Key info" (Sections 5.2, 6.2, 7.2) doesn't stand alone.

Contents, piii-iv

The structure is inconsistent and scattered:

Section 1. Plain English summary. Better to omit unnecessary "plain English."

Section 2. "Understanding risk." Of what? Please replace with "Understanding risk of alcohol-related harm over a lifetime"

Sections 5.-7. The Guideline headings are inconsistent with three distinct categories of population groups used by the NHMRC in its the approach. These are defined (see "How the Guidelines were developed, page 5, para 3) as healthy adults, children and young people, pregnant or breastfeeding women. It would be more consistent and much stronger and clearer to use the following headings:

Guideline one: Reducing the risk of alcohol-related harm in healthy adults

Guideline two: Reducing the risk of alcohol-related harm in children and young people

Guideline three: Reducing the risk of alcohol-related harm in women who are pregnant or breastfeeding

Section 5. Guideline One. Too long to read easily. Suggest use of the same headings as in 6. &

7. and transfer of information to Sections 2-4.

Section 5.8.1 Pregnant and breastfeeding women. An inconsistent heading with Guideline three. Best to transfer 5.8.1 to Section 7

Section 5.8.2 Young adults aged 18-25 years. It would be better to put all young people under the same Guideline two (using sub-headings). Best to transfer 5.8.2 to Section 6

Young people don't suddenly change into different people when they turn 18

Section 2. Introduction. Scope of the guidelines, p4

The document is focused on reducing the health risks from drinking alcohol the drug but to be useful and practical it must include recognition that all alcohol also function as a food and fluid in the food habits and ways of Australians. It would be good to make cross-reference to the Australian Dietary Guidelines here (see reference at the end of this document).

Section 3. Background, Indigenous Australians, p11

This separate heading has not been included in the Contents outline. Suggest put this information earlier in this section without a heading.

Section 3. Background, Older people, p12

This heading is inconsistent with the heading “People aged over 60” used elsewhere in the document.

Section 3. Background, Nutrition related conditions, and Overweight and obesity: p15

The information under these two headings should be combined under the same heading “Nutrition related conditions.” The health effects are usually holistic so best to put this combined section first under “Cumulative effects.”

Alcoholic beverages and their mixers contribute energy intake and most often also carbohydrate intake. Even at the level of risk drinking, the caloric/joule intake is considerable and contributes to change in health and wellbeing (over- and under-nutrition) over months and years.

Alcoholic beverages are high in energy (ethanol and carbohydrate), can change food habits and displace food and nutrients from the diet. Even at the level of risk drinking specified (20 g ethanol supplies 600 kJ and an additional 5-20 grams of carbohydrate supplies 350 kJ).

In an individual of low body weight and poor food intake, even the level of risk drinking specified displaces valuable food from the diet which can lead to underweight and malnutrition over months and years. In such individuals it can predispose to poor physical and mental health and nutritional deficiencies.

In an individual of normal or high body weight, the level of risk drinking specified can increase energy and food intake which lead to overweight and obesity over long periods. In such individuals it can predispose to poor physical and mental health and diseases of affluence.

Section 3. Background. Liver diseases, p15

As a consequence of alcohol use, fatty liver is much more common than liver cirrhosis and precedes it, affecting physical and mental health.

Section 5. Guideline one, p20

Where is the section “Practical info”? Inconsistent with Sections 6 and 7.

Section 5.2 Key info. Benefit and harms, p23

“Drinking alcohol within this guideline has substantial net benefits, as opposed to drinking above it.” This is a very positive statement, vague, doesn’t stand alone, ambiguous, needs re-writing.

Section 5.3.1 -2. Systematic reviews and modelling, p26-27

Why has a systematic review of health conditions related to undernutrition and/or overnutrition been omitted, or, alternatively a statement made about it with appropriate references.

Section 5.8.1 Pregnant and breastfeeding women, p35

An inconsistent heading with Guideline three. Repetitive - best to transfer 5.8.1 to Section 7.

Section 5.8.2 Young adults aged 18-25 years, p35

Repetitive. It would be better to put all young people under the same Guideline two (using sub-headings). Best to transfer 5.8.2 to Section 6. Young people don't suddenly change into different people when they turn 18

Section 6. Guideline two, p39

I respectfully recommend that Section 5.8.2 be placed under this Guideline two instead of Guideline one, perhaps with cross-referencing etc . As body composition development (height and weight etc) extends beyond 18 years (particularly in males), the cut-off point of this recommendation for the age of 18 years may be too low in many young adults.

This guideline is too prescriptive and needs to be qualified on the grounds of physical development and its coincidence with driving – making double jeopardy for some young individuals. Young people don't suddenly change into different people when they turn 18

Section 6.2. Key info. Benefits and harms , p40

Please strengthen this sentence by reversing its order to “Children and young people under 18 years of age derive substantial net benefits from not drinking alcohol as advised by this Guideline.”

As much of what is said in Section 6.0 also applies to Section 5.8.2 these sections should be combined in some way.

Section 7. Guideline three, p47

The heading wording is inconsistent with the contents outline.