

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

British Society of Gastroenterology

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We support that the low risk drinking guidelines does not advise on a specific number for single occasion drinking. Our position is based on the following:
Best possible communication: We believe low risk drinking guidelines need to be easy to communicate to make the public aware and understand the guidelines, and should therefore only be one number (14), with the additional information that this amount should be spread on several days. Introducing a number for drinking on a single occasion can confuse the messaging, and as a result disrupt the main message of 14 units per week.
Risk of higher consumption levels perceived as low risk drinking: If a single occasion low risk drinking guideline were introduced, we believe this would be the dominant guideline remembered by the consumers compared to the weekly guideline, and thus confuse consumers on what the limit for low risk drinking is. If for example a single occasion guideline is set to 7 units, we risk consumers thinking they are within the low risk drinking patterns by never consuming more than 7 units per occasion. If this is repeated several times a week, consumers easily exceed the weekly limit of 14.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Breast Cancer Now

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Breast Cancer Now is the UK's largest breast cancer charity, dedicated to funding ground-breaking research into the disease. Our ambition is that by 2050, everyone who develops breast cancer will live. We're bringing together all those affected by the disease to improve the way we prevent, detect, treat and stop breast cancer. Regularly drinking alcohol (even one drink a day) increases the risk of developing breast cancer, and this risk increases with increased consumption. We therefore focus a proportion of our public health work on advising people about their risk, and how they can reduce their consumption of alcohol. The advice we give is in line with the CMO guidelines. We are therefore keen to ensure that the guidelines would be understandable and suitable for our audience. We have extensive expertise in public health work (both at an individual and policy level), and in behaviour change. We therefore hope that the following comments are helpful.

Regarding the summary of the proposed guidelines, we would like to see clarification on the third bullet point in summary, with the addition of 'even if you drink within the recommended 14 units' so that there is no ambiguity in interpretation.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We would like to see clarification regarding what comprises 'alcohol-related conditions'. Readers may assume these to be solely liver-related conditions. In addition, '1% increase in risk' may not be easy for the general public to understand. Using numbers of people is a preferable way to communicate risk. For example, in the information that we provide here at Breast Cancer Now, we advise that in a group of 100 women who do not drink, 11 will probably develop breast cancer in their lifetime. In a group of 100 women who drink two units a day (a standard glass of wine), 14 will probably develop breast cancer in their lifetime.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We are concerned with the use of the word 'heavy' to describe drinking alcohol as it is a subjective term, therefore indicating what defines 'heavy' would be preferable. This definition should include not just the number of units defined a 'heavy' drinking but also a few examples of the types of drinks that would make up these units, for example a bottle of wine or 3 pints of beer.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Breast Cancer Now welcome the mention of the link between alcohol consumption and breast cancer as, from our experience, this link is not well-recognised amongst the general public. We feel that the point in the summary that 'there is no level of regular drinking that can be considered as completely safe' is much clearer to understand than the current guideline 'the risk...increases with any amount you drink on a regular basis'. The point that no level of regular drinking is safe should either be made the main point in the guideline, or at least be added to it.

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Breast Cancer Now agrees that there are strong arguments both for and against advising on a daily limit for consumption. While this would be easier to understand and less prone to misinterpretation, it may vary from person to person, and may be interpreted that seven units per day is a reasonable amount to drink on a regular basis.

Nevertheless, the evidence regarding the link between alcohol and breast cancer pertains to regular weekly/daily drinking, rather than episodes of heavy drinking. As such, a daily limit is not necessary for our aims and public health work.

Should a maximum daily limit be set, we would prefer for any advice on the maximum single occasion drinking to be always clearly labelled 'heavy drinking' and the limit to be expressed both in units and in quantities of different alcoholic beverages.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

cardiff university

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

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No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Personally, I think that with the other information provided it is a personal judgement on one single occasion. I don't feel units would improve the single drinking occasion guidelines.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Lancashire Women's Centre

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This advice on regular drinking is based on the evidence that if people did drink regularly at or above the low risk level advised, overall any protective effect from alcohol on deaths is overridden, and the risk of dying from an alcohol-related condition would be expected to be around, or a little under, 1% over a lifetime. This level of risk is comparable to risks from some other regular or routine activities

I think the above explanation is long-winded and does not use clear or understandable language, my understanding of the comment is that if people drink equal too or more than the recommended level there would be no health benefits, I'm also not clear on the ,regular or routine activities, sentence as I don't think that explains what these could be, so perhaps an example to be added to this,

Every other guideline and explanation is clear and understandable

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-23 07:26:47

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:
private individual

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Advice should avoid cognitive dissonance, be consistent with previous advice, and should reflect a rounded and balanced picture setting specific risks in the broad context of all risks. This new advice fails on all three counts, and is therefore likely to be disregarded by the public while adversely distorting local policy and practice development.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This advice places one particular risk in a position of overall superiority to all other risks. This is likely to confuse the public and lead to disregard of the risk, since it will ring hollow. Bingeing and abstaining are regarded as more easily handled by the liver, for example, than regular daily consumption.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The public is largely familiar with the present guidance. This dramatic change, especially for men, is unexplained. People are also aware, not least from travel, that other jurisdictions give completely different advice on the basis of the same evidence, and again no explanation of the rationale for this is offered. In the case of the US, in particular, their recent review reached the opposite conclusion to the CMOs on the same evidence. How can the UK populace be expected to regard that as reasonable advice worth following?

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It appears to me most likely that the DH, having achieved considerable traction and impressive reductions in alcohol consumption amongst heavier drinkers over the past twenty years now risks placing all that good work at risk if it were to adopt this prohibitionist agenda.

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I would see the adoption of the new recommendations as likely to encourage more widespread disregard for the guidance and resentment of the attempted state intervention in private conduct.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It is in my view a mistake to confuse the risks of accident and those around health and disease.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Submitted to **UK CMO Guidelines Review**
Submitted on **2016-03-23 11:21:08**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Age UK Blackburn with Darwen

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

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Yes

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No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

it is unlikely to make any real difference to peoples behaviour at the time

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 What is your organisation?

Organisation:

University of Oxford

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I don't understand if you're saying basically drink nothing or it's OK to drink 14 units as you say the risk increases with 'any amount you drink'.... and you don't mention there is a protective effect of moderate alcohol consumption for certain conditions.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Conflicting and also fails to discuss any benefits of low alcohol consumption. There is no reason not to flip the message around and state that complete abstinence can not be considered as completely safe due to the protective effect observed in moderate drinkers. Its a biased way of presenting the evidence and treats the public like small children!

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Although I think the average adult could work this out for themselves!

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

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No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This guideline will lead to women lying to health professionals as they don't want to be condemned as bad mothers drinking moderately whilst pregnant - yet another thing for pregnant women to stress about!

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

International Alliance for Responsible Drinking (IARD)

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The weekly guideline lacks sufficient clarity around the relationship between drinking and health outcomes – both positive and negative – and confuse consumers instead of accurately informing them.

Daily, rather than weekly recommendations are easier to relate to and also to monitor; they offer more accessible and appropriate guidance for those choosing to drink.

No rationale is given for why the recommendation for both men and women has been set at the same level of 14 units per week. Given the differences in physiology and alcohol metabolism between women and men, and the resulting differences in the effects of drinking, there is no obvious rationale for the recommendation, which is also out of step with most other national drinking guidelines.

The statement that the risk of illness increases with "any" drinking on a regular basis does not accurately reflect the scientific evidence and does not provide a benchmark for distinguishing harmful from non-harmful drinking.

Harmful outcomes related to heavy drinking are well understood. This is not the case for light and moderate drinking. In fact, there is strong evidence that regular low-to-moderate drinking may be associated with health benefits for some individuals, including reduced risk of type II diabetes mellitus and some forms of cardiovascular disease, as well as death from all causes.

While the advice to avoid heavy drinking sessions is useful, it also lacks clarity by not stating that these sessions must be frequent and regular. Occasional heavy drinking sessions increase risk of accidents and injuries and should be avoided, however, evidence on their relationship with long-term illness is not well understood.

An approach that distinguishes between risky and non-risky drinking patterns would be more helpful in providing information and allowing consumers to understand the likely outcomes of their own drinking.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This guideline is likely to confuse and alarm consumers about the potential risk associated with light and moderate drinking. It does not differentiate between risky and non-risky drinking patterns, which is particularly important given that the majority of UK consumers drink at lower levels, according to the CMO background reports.

Long-term health risks occur over long time periods at heavier consumption levels that significantly exceed the recommended 14 units per week. A very robust body of scientific evidence also points to the benefits that many people experience from low to moderate drinking levels. On balance, these benefits may

outweigh some alcohol-related harms.

The scientific evidence strongly shows that the risk of premature death from all possible causes is actually reduced at daily consumption levels of up to around 20g of alcohol per day for women, and 40g for men. Both of these levels are well above the current recommended UK levels.

Evidence on all-cause mortality has been excluded from the current analysis. Instead, the approach taken has been to focus on the lowest possible level of consumption at which risk increases. In reality, however, even for individual health outcomes, these relationships cover a range of drinking levels.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Scientific evidence clearly points to a relationship between heavy drinking episodes and increased risk of harmful outcomes, notably accidents and injuries. As a result, the recommendation that such episodes should be avoided is welcome and well-placed.

However, while even single episodes of heavy drinking may increase risk of acute outcomes, the statement in the guideline that "even one or two heavy drinking sessions" may increase the risk of death from long term illnesses is inaccurate and not supported by the science.

It is important to make clear in the drinking guidelines that the association between heavy episodic drinking and long-term illness only applies if heavy episodes are frequent and occur over long periods of time. This important distinction is not included in the guideline and is an essential element to ensuring that the recommendations provided are sound, scientifically-based, and offer accurate information on the relationship between drinking patterns and outcomes.

Recommendations can only be credible if the underlying evidence is conveyed in an accurate manner.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The categorical statement that risk of various cancers increases "with any amount you drink on a regular basis" is likely to confuse and unnecessarily alarm consumers, particularly those who drink at light and moderate levels. According to the background CMO reports, this includes the majority of UK consumers.

Heavy drinking has been shown to increase risk of certain chronic diseases, but the relationship has not been established at lower levels, including at 14 units per week. Cancer risk, including of the throat and mouth, is linked with heavy drinking, while studies on breast cancer show that increased risk starts at consumption levels between 12.5 and 50 grams per day. Cancer risk also depends on many other individual-level factors that may play a more important role than drinking.

There is solid evidence that regular light to moderate drinking, particularly with meals, is associated with benefits for certain chronic diseases, including some cardiovascular conditions, type II diabetes, osteoporosis, and pancreatic disease.

For many healthy adults who drink moderately, there is evidence that the balance of the effects of moderate drinking can be protective and reduce risk of both individual harms and death from all causes.

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The recommendation on alcohol-free days does not apply to light and moderate drinkers and is aimed at those with heavy drinking patterns. This distinction is not made in the guideline and will likely confuse consumers.

There is no evidence of benefits for light and moderate drinkers from such alcohol-free days. In fact, for some people, daily light and moderate drinking, preferably with meals, may well confer cardiovascular benefits.

For heavy drinkers, on the other hand, alternative approaches to alcohol-free days are considerably more effective in reducing harmful outcomes. These include screening for problems and interventions to change drinking patterns, motivational approaches, and, for heavy and dependent drinkers, treatment. However, none of these measures apply to the healthy adult drinking population that drinks lightly or moderately.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Whether regular alcohol consumption is likely to increase risk of short- or long-term harms depends on the pattern of drinking. This is not made clear in the recommendation, which will confuse, rather than inform consumers.

The scientific evidence clearly shows that heavy drinking, both regular and episodic, is linked with increased risk for some detrimental effects on health, including cancers, heart disease, and alcoholic liver cirrhosis. The evidence on epilepsy is contested. The evidence also shows a heightened risk of accidents and injuries linked with individual heavy drinking episodes.

However, the evidence does not support a consistent relationship between regular low-to-moderate drinking and either acute or chronic harm. In fact, for some individuals, regular drinking at low and moderate levels may actually reduce the risk of certain health conditions, including some cardiovascular diseases and type II diabetes, as well as of all-cause mortality.

By failing to distinguish between heavy and light and moderate patterns of drinking, the guideline presents the wrong impression and confuses the public. Greater clarity is needed about drinking patterns and outcomes in order to equip consumers to make responsible choices about drinking.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

While, as the summary points out, "individual variation in short term risks can be significant," the same is true for risk in the long-term.

However, directional advice about short-term risk, particularly about potential accidents and injuries, is more accessible to consumers if it is expressed in terms of units and reflects the level of drinking at which risk increases.

There is strong precedent for this approach, for example, in the setting of BAC levels, which can be directly related to units with relative ease. Clear guidance of this nature allows consumers to understand potential risks associated with heavy drinking episodes, and also to monitor their own more easily so as to avoid patterns that may increase risk of harm.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-24 14:44:02

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:
Hull City Council

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- There is a lack of understanding locally regarding the nature of units. There is a concern that there is/continues to be a lack of clarity due to the variation between drink sizes and strengths. The specified 14 units per week and 14 units per week spread evenly over 3 days or more, therefore remains unclear to/for people/member of the public.
- Will the proposed changes affect current practice in relation to screening using the Alcohol-use disorders identification test (AUDIT) for example. If yes, when will AUDIT be reviewed and re-issued?
- Are the changes to be reflected in NICE guidance, for example, reference to the use of AUDIT for screening purposes is made in NICE PH Guidance 24 Alcohol-use disorders: preventing harmful drinking; if yes, what is the timescale for the changes to be made and AUDIT re-issued?
- Alcohol Guidelines Review Report states that guidelines should be clearly spelt out – simple, specific, measurable, time-bound and realistic. In light of this:
- Concern with use of the word "safe/safest" except in the context of not safe. Safe and not safe are easy to understand, safer and safest are potentially subjective. Would prefer to see "You are advised to not drink regularly". Safe is at odds with point 17 – "there are a number of serious diseases including certain cancers, that can be caused even when drinking less than 14 units weekly"
- Regarding "risks of death and long term illnesses" provide examples for example heart disease, this may make the advice more tangible/meaningful to individuals.
- Would prefer "several" to be specified as a number – again more meaningful for the public.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

However not sure about 14 "1%" over a lifetime

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Because highlights the dangers of binge drinking

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Provided that the explanation is used to support the guideline (e.g. in practitioner to patient/client interactions).

Additional response:

Would be interested to see a guideline which makes reference to people with existing disease e.g. those with mouth, throat or breast cancer (as quoted in this document). Should those people be given precautionary advice similar to that of pregnant women e.g. no safe level of alcohol consumption. This would help practitioners and patients.

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

In part: what does "several" mean - vague and subjective. Would prefer to have stated at least 2 days per week for example.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

In part

"Limiting the total amount of alcohol you drink" is vague. A number of units may be more helpful despite the differences in individuals which impact.

Happy with the drink more slowly and with food etc. Good, clear, practical advice.

Agree in principle but avoiding "risky places" is also vague.

With regard to groups of people at risk – a simple explanation of why might be helpful.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

For reasons specified earlier, limiting the amount of alcohol you drink is too vague.

The explanation re individual variation in short term risks and the factors which alter that risk is helpful but would need to be part of the guideline or offered with advice from a practitioner to make meaningful.

A numerical weekly limit has been set, a single session limit may be useful and more meaningful to the public.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Note: This is the clearest part of the guideline as a precautionary approach has been adopted.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies 2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy 3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant. Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

However, the statement that "reasonable reassurance for women who may discover they have drunk alcohol before knowing they are pregnant" whilst there, is not clear/sufficiently defined or emphasised.

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Dawkins Ales

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It is clear, but the basis is ill-conceived and junk science.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It is clear, but the basis is ill-conceived and junk science.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It is clear, but the basis is ill-conceived and junk science.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It is clear, but the basis is ill-conceived and junk science.

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It is clear, but the basis is ill-conceived and junk science.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It is clear, but the basis is ill-conceived and junk science

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Stroud Brewery

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The claim that there is no safe level of consumption is misleading and ignores the widespread scientific evidence that shows that mortality for all causes is lower for moderate drinkers

- It is confusing to say there is no safe level and you are safest not to drink regularly more than 14 units
- The reduction for men from 21 to 14 units per week is not in line with the international approach, is based on a flawed consideration of the evidence and will not be seen as sensible by most drinkers
- It also suggests that women can drink as much as men, which is contrary to the facts and dangerous.
- Removing advice on daily guidelines which people have become used to is confusing
- It is not acknowledge that some alcoholic drinks, such as beer, are lower in alcohol content and could be part of an attempt to reduce overall consumption
- Consideration of 'risk' does not consider risks from other activities and lifestyle decisions and therefore lacks context, common sense and usefulness
- The link between drinking and cancer is over-simplified since drinking can have a range of effects on cancer risk and there is clear established evidence of a protective effect in some cases

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

People will be confused by the reference to a 1% increase in risk with no explanation of the comparison with 'risks from some other regular or routine activities'

- Use of terms such as 'safest' and 'low level' are confusing and misleading and the guideline fails to acknowledge the overwhelming body of evidence from across the World that moderate drinking above these levels can reduce mortality from all causes. To dismiss this evidence is potentially damaging to the credibility of the guidelines

with consumers and reveals serious flaws in the process behind their formulation.

- The move to

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

As above this pays no attention to the fact that alcoholic drinks vary in strength, so consumers choosing to drink lower strength drinks rather than abstain on some days has not been considered

- There is no explanation of what a 'heavy drinking session' is and given this, it is impossible for anyone to consider what the risk is over the long-term. It is not credible to suggest that one or two heavy drinking sessions will increase the risk of death from long-term illness
- It is unclear if people choosing to drink fewer than 14 units per week need to spread this over three days or more.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This guideline is misleading and ignores the well-recognised body of evidence which establishes a link between regular moderate drinking and lower mortality

- For this reason the guideline fails to enable people to make an informed choice and this could have a serious impact on how consumers respond to further guidance on health and wellbeing related to diet, lifestyle, obesity, lack of exercise, etc
- Given the risks associated with simply being alive, it is completely misleading to establish a simple link that the more alcohol you drink, at any level, the more you increase the risk of becoming ill
- Equally disturbing, the guideline implies that avoiding alcohol may offer protection from developing illnesses since there is no reference to the risks associated with other lifestyle or environmental factors

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This ignores the fact that a similar outcome could be achieved by switching to lower-strength products

- While this advice may be helpful and justified for heavy drinkers or in the event of a heavy drinking session, we don't think it is credible for those drinking within the guidelines and could be misunderstood leading to them drinking more on a single occasion

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It is unclear what is meant by 'risky places and activities'.

- The guideline ignores the fact that men and women have different tolerances to alcohol
- The combination of short term and long term risks is confusing and does not provide people with useful clear information.
- There is no consideration of the social and wellbeing benefits through enjoying alcohol responsibly in sociable and safe environments such as pubs

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

• I do not have a preference on this point, but consumers have become used to daily guidelines and this change will be confusing

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-24 16:39:26

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Revolutions Brewing Company Ltd

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The guidance can only be "clear and understandable" if a rational, intelligent person pays it any heed!

- The claim that there is no safe level of consumption is flawed, misleading and ignores the widespread scientific evidence that shows that mortality for all causes is lower for moderate drinkers
- The reduction for men from 21 to 14 units per week is not in line with the international approach, is based on a flawed review of the evidence and will not be seen as valid by rational people
- It also suggests that women can drink as much as men, which is contrary to the facts, dangerous and lacking in common sense

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It is far from clear - and due to its lack of common sense, is likely to be ignored by rational people.

People will be confused by the reference to a 1% increase in risk with no explanation of the comparison with 'risks from some other regular or routine activities' - like what? Car washing? Trampolining? Running for a bus? It means nothing, therefore people will regard it with suspicion at best, contempt at worst.

Use of terms such as 'safest' and 'low level' are confusing and misleading and the guideline fails to acknowledge the overwhelming body of evidence from across the World that moderate drinking above these levels can reduce mortality from all causes. To dismiss this evidence is potentially damaging to the credibility of the guidelines with consumers and reveals serious flaws in the process behind their formulation. It's almost as though there is an anti-alcohol agenda that needs to be supported, regardless of evidence to the contrary or a need to provide CREDIBLE guidance!

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This completely ignores the positive health & social benefits attained from moderate alcohol consumption. What exactly is a "low level" of health risk? And where are the counter balance of the positive benefits explained?

This gives no consideration to the fact that alcoholic drinks vary in strength, so consumers choosing to drink lower strength drinks rather than abstain on some days has not been considered

There is no explanation of what a 'heavy drinking session' is and given this, it is impossible for anyone to consider what the risk is over the long-term. It is not credible to suggest that one or two heavy drinking sessions will increase the risk of death from long-term illness

It is unclear if people choosing to drink fewer than 14 units per week need to spread this over three days or more.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- It is not as this guideline is misleading, simplistic and ignores the well-recognised body of evidence which establishes a link between moderate drinking and lower mortality
- The guideline fails to enable people to make an informed choice and is potentially counter-productive by negatively impacting on how rational people respond to future guidance on health and wellbeing regarding diet, lifestyle, obesity, lack of exercise, etc
- Simply being alive is a risk! It is misleading, dangerous and borderline negligent to promote a simple link that the more alcohol you drink, at any level, the more you increase the risk of becoming ill.
- Equally disturbing, the guideline implies that avoiding alcohol altogether may offer protection from developing illnesses since there is no reference to the risks associated with other lifestyle or environmental factors

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It ignores the fact that a similar outcome could be achieved by switching to lower-strength drinks.

Acknowledging that this advice may be helpful and justified for heavy drinkers / binge drinkers, it is simply not credible for rational, intelligent people enjoying moderate drinking as part of a sensible lifestyle, indeed, it has already produce ridicule and made people question the guidelines methods, message and motives.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Fundamentally, this advice seems to be written for the intelligence level of a slow-witted 12-year old. Of course over-indulgence in alcohol can be harmful, but it needs better and more credible advice than this!

- It is unclear what is meant by 'risky places and activities' - it is so generic as to be meaningless.
- The guideline ignores the fact that men and women have different tolerances to alcohol, to state differently is not an affront to equality, it is simply fact.
- The combination of short term and long term risks is confusing and does not provide people with useful clear information.
- There is no consideration of the social and wellbeing benefits through enjoying alcohol responsibly in sociable and safe environments such as pubs.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more

general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

A blanket number i.e. 7 units, is potentially dangerous and counter-productive as 7 units to me, a 100kg middle aged man, is clearly a different proposition to 7 units to a 50kg, late teenage young woman.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Response ID ANON-FRVK-5YZT-N

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-28 12:43:37

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:
ASCERT

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:
The weekly guideline in itself is clear but the explanation from the summary of proposed guidelines in some areas uses language that is not clear and could be explained in plainer english.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:
The weekly guideline in itself is clear but the explanation from the summary of proposed guidelines uses language that the general public may not understand i.e. 'protective effect from alcohol on deaths'. This could be explained further and in plainer english.

Also, in para 14 the reference to 'regular or routine activities' is not particularly informative and would benefit from examples.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:
The suggestion of several alcohol free days is not very clear. What does several mean in this instance? Is it the case that the more alcohol free days the lower the risk? If so, why not say that?

It also would benefit from saying that harm can be reduced by reducing the number of units drank in any episode.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It is clear overall but the risks of alcohol combined with other drugs and medicines is too general. It should explain there are particularly high risks from combining alcohol with other depressants or opioids.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Dont think that a single occasion unit level will have any real impact and advice should be about overall pattern of drinking, so single episode in addition to weekly recommended limits could be confusing and not have any material impact.

The overall message would be clearer if it focused on less alcohol means less risk.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This is very helpful and clarifies the confusion that could occur with explanation of advice from previous guidelines.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

British Association for the Study of Liver disease (BASL)

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-29 16:18:19

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Alcohol Research UK

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The wording is broadly clear and understandable. However, the second bullet point may be misunderstood (and was recently misunderstood in a widely-reported press release from the Office for National Statistics) as equating to a 'limit' of 4.67 units per day. It may be better to simply state that it is best to spread your drinking over a number of days, to avoid heavy drinking sessions and, if seeking to cut down, to have drink-free days.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The explanation is generally clear. It may help to include an example of some of the other 'routine activities' that carry a 1% mortality risk in order to help readers make sense of the figure. The first bullet point doesn't distinguish between conditions which are associated (at a low risk level) with drinking at around or just above the revised guidelines over time, and those associated (at a higher risk level) with heavy drinking over time. The explanation provided here should mention that risks of injury and accidents (i.e. acute risks associated with single drinking occasions) were also a factor in determining the new low-risk limit for men.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The phrase 'spread evenly over three days or more' invites a calculation of daily unit consumption which may be unrealistic, and which could be avoided by rephrasing as 'spread over a number of days'.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The guideline is correct in noting that risk levels for some conditions increase with any amount of consumption, and this is information that consumers should be provided with. However, the current wording gives no information on absolute risk levels beyond noting the expert group judged the risk to be 'low'. Absolute risk figures for cancer are available in the supporting documents, so could be included here in a truncated or illustrative form.

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The wording is clear; however while this is sound advice the phrasing suggests stronger evidence than is described in the supporting documentation. Also, while the advice has strong relevance to older drinkers who tend to consume more regularly, it may have a different impact on younger drinkers who tend to have alcohol-free days while drinking more heavily on single occasions. It might be more accurate to say that 'a good way to achieve this may be to have several...'

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The recommendation uses 'short term health risks' as a synonym for 'injury', which is somewhat unusual in terms of general usage.

It is not clear how young adults or older people are 'affected more by alcohol'; what 'affected more' means or what age groups 'young adults' or 'older people' specifically refer to. This categorisation also implies there is a group between young adults and older people who are affected less by alcohol. The evidence summary states that the 'most obvious' difference in regard to single occasion drinking is gender (para 72), but that is not covered here.

The sentence beginning 'As well as the risk of accident and injury...' is not about single occasion drinking.

The sentence starting 'Short term risks from heavy drinking...' is inaccurately worded. Heart disease is not a short-term risk according to the definition given in the preceding paragraph. Whereas alcohol poisoning is a short-term risk from heavy drinking in a short time, heart disease is a long term risk from regular heavy drinking in a short time.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

If the health evidence justifies it, then clearly it is preferable; however, the conclusions of the expert group appear to be that the health evidence does not justify this.

Furthermore, recent UK evidence (e.g. Lovatt et al. 2015) suggests that technical, unit-based guidance does not accord with the lived experiences of drinkers. Without good evidence that a units-based single-occasion guideline would be more effective, then it is advisable to follow the guidance of the expert group.

The phrasing of any such advice, however, has to be carefully considered, and if the decision is to provide general advice in lay terms then it should be presented in familiar language. The basic message in paragraphs 2 and 3 appears to be: drinking too much or too quickly can make you drunk, and drunkenness can lead to risky behaviour. This is sound (and reasonably obvious), but as currently phrased may appear convoluted and / or condescending to general readers with lived experience of drinking.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This recommendation makes it clear that the advice to avoid all alcohol is precautionary, and that the risks of harm arising from low levels of consumption are very low. This is correct: the guidelines should be open about uncertainties, provide accurate information and avoid creating unwarranted anxieties. It should, though, be made clearer that women who followed the previous guidance are not at increased risk (i.e. that new evidence has not emerged showing that the risks associated with the previous guidelines were higher than previously thought). Otherwise there is the danger that mothers who drank according to the previous guidelines now suffer unwarranted anxiety regarding risks to their children.

The figures of 19% and 40% are confusing. If the 19% figure refers to non-drinking among women generally, it is not directly relevant to drinking in pregnancy since we do not know what proportion of those women do not intend to, or are to old to, become pregnant. The 40% figure implies most women (i.e. 60%) who drink do not stop drinking during pregnancy.

The sentence 'The expert group found that the evidence supports a 'precautionary' approach' is not entirely accurate. According to the supporting documentation the decision to adopt a no-drinking precautionary approach is based on 'good arguments' and presentations to the committee (Paras 90 and 93) regarding clarity of message and the possibility that future findings may contradict current evidence. It may be more accurate to say that 'the expert group decided on balance that a precautionary approach was preferable'.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

But see comments on Q 11.

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Age UK Blackburn with Darwen

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

SIBA, Society of Independent Brewers

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- The clear suggestion that there is no safe level of alcohol consumption is not credible and is misleading as it is contrary to well-established scientific evidence form across the World that mortality (from all causes) for moderate drinkers is lower than for non-drinkers and that moderate drinking can have some protective effects. There is no reference to this in the guideline.
- The guideline is inconsistent and confusing as it states that you are 'safest not to drink regularly more than 14 units ...' while then intimating that there is no safe level of consumption.
- We believe that the drop for men from 21 to 14 units per week will not be regarded as credible by many male drinkers who regard themselves as sensible in their consumption of alcohol
- The reduction for men conflicts the approach taken in thirty countries which have recognised in their guidance that there are differences in alcohol metabolism for men and women together with different body water and fat content for men and women. The rationale for this is unclear and confusing for consumers. It also suggests that women can drink as much as men, which is contrary to the facts.
- The levels for men are now amongst the lowest in the world, even compared to those countries which have carried out recent reviews. This is confusing for consumers.
- We are concerned that the guidelines will not be credible with most consumers and therefore will be ineffective in helping people consume alcohol responsibly and safely because they fail to acknowledge the well-established evidence of the benefits of moderate drinking and are negative in both tone and substance
- The risks associated with drinking up to or above the weekly guidelines are not set out to enable consumers to make informed choices about their drinking
- Consumers have become used to guidance on daily units which have been abandoned. This is confusing for those who have become used to daily guidelines
- The guidelines do not acknowledge that some alcoholic drinks are lower in alcohol content and that their consumption could be part of an attempt to reduce overall consumption of alcohol
- Introducing the concept of risk into the guidelines is highly questionable as there is no attempt to put this in context with other risks such as poor diet and lack of exercise. This lacks a common sense approach and will undermine the credibility and effectiveness of the guidelines
- The link between drinking and cancer is over-simplified since drinking can have a range of effects on cancer risk and there is clear established evidence of a protective effect in some cases.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- We do not think consumers will regard the advice as sensible or balanced since the risks of alcohol consumption over the long term cannot be treated in isolation from the other risks associated with peoples' lifestyles and therefore it is not possible from the guidelines to make well-informed decisions
- Consumers will be confused by the reference to a 1% increase in risk with no explanation of the comparison with 'risks from some other regular or routine activities'
- Use of terms such as 'safest' and 'low level' are confusing and misleading and the guideline fails to acknowledge the overwhelming body of evidence from

across the World that moderate drinking above these levels can reduce mortality from all causes. To dismiss this evidence is potentially damaging to the credibility of the guidelines with consumers and reveals serious flaws in the process behind their formulation.

- The move to weekly as opposed to daily guidelines is confusing for people who have become used to daily guidelines which are much easier to follow. It may result in people thinking they can consume the weekly allowance in one or two occasions, especially given the message that there should be several alcohol free days.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- As 5 above this pays no attention to the fact that alcoholic drinks vary in strength, so consumers choosing to drink lower strength drinks rather than abstain on some days has not been considered
- There is no explanation of what a 'heavy drinking session' is and given this, it is impossible for anyone to consider what the risk is over the long-term. It is not credible to suggest that one or two heavy drinking sessions will increase the risk of death from long-term illness
- It is unclear if people choosing to drink fewer than 14 units per week need to spread this over three days or more

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- This guideline is seriously misleading and ignores the well-recognised body of evidence which establishes a link between regular moderate drinking and lower mortality. This has led to various experts from around the World commenting publicly on the new guidelines inconsistency with the evidence base, which seriously undermines the credibility of the guidelines.
- For this reason the guideline fails to enable people to make an informed choice and this could have a serious impact on how consumers respond to further guidance on health and wellbeing related to diet, lifestyle, obesity, lack of exercise, etc
- Given the risks associated with simply being alive, it is completely misleading to establish a simple link that the more alcohol you drink, at any level, the more you increase the risk of becoming ill.
- Equally disturbing, the guideline implies that avoiding alcohol may offer protection from developing illnesses since there is no reference to the risks associated with other lifestyle or environmental factors

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- This ignores the fact that a similar outcome could be achieved by switching to lower-strength products
- While this advice may be helpful and justified for heavy drinkers or in the event of a heavy drinking session, we don't think it is credible for those drinking within the guidelines and could be misunderstood leading to them drinking more on a single occasion

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- We are unclear what is meant by 'risky places and activities'. This is likely to be confusing for consumers and, given the detail within this guideline, it needs to be specific to be of any use.
- The guideline makes no reference to the widely accepted evidence-based view that men and women generally have different tolerances to alcohol
- The combination of short term and long term risks and the consideration of risks from accidents, etc alongside disease, etc is confusing in the extreme and does not provide people with useful clear information. The formation of the guideline based on a combination of primarily long term risks for women, but short-term acute risks for men is seriously flawed and will make it impossible for consumers to make decisions based on this advice.
- It is also a missed opportunity and a demonstration of the negative bias to the guidelines that there is no consideration of the social and wellbeing benefits to wellbeing experienced by millions of people through enjoying alcohol responsibly in sociable and safe environments such as pubs.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- SIBA does not have a preference on this point, but would point out that consumers have become used to daily guidelines since their introduction in 2005 and,

for many, this change will be confusing, particularly for those who were drinking within the previous guidelines and who may now be concerned that they are problem drinkers. It is also the case that most other countries have daily guidelines and consistency internationally would be preferable

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 What is your organisation?

Organisation:

Drinks Wales

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- The clear suggestion that there is no safe level of alcohol consumption is not credible and is misleading as it is contrary to well-established scientific evidence from across the World that mortality (from all causes) for moderate drinkers is lower than for non-drinkers and that moderate drinking can have some protective effects. There is no reference to this in the guideline.
- The guideline is inconsistent and confusing as it states that you are 'safest not to drink regularly more than 14 units...' while then intimating that there is no safe level of consumption.
- We believe that the drop for men from 21 to 14 units per week will not be regarded as credible by many male drinkers who regard themselves as sensible in their consumption of alcohol.
- The reduction for men conflicts the approach taken in thirty countries which have recognised in their guidance that there are differences in alcohol metabolism for men and women together with different body water and fat content for men and women. The rationale for this is unclear and confusing for consumers. It also suggests that women can drink as much as men, which is contrary to the facts.
- The levels for men are now amongst the lowest in the world, even compared to those countries which have carried out recent reviews. This is confusing for consumers.
- We are concerned that the guidelines will not be credible with most consumers and therefore will be ineffective in helping people consume alcohol responsibly and safely because they fail to acknowledge the well-established evidence of the benefits of moderate drinking and are negative in both tone and substance.
- The risks associated with drinking up to or above the weekly guidelines are not set out to enable consumers to make informed choices about their drinking.
- Consumers have become used to guidance on daily units which have been abandoned. This is confusing for those who have become used to daily guidelines.
- The guidelines do not acknowledge that some alcoholic drinks are lower in alcohol content and that their consumption could be part of an attempt to reduce overall consumption of alcohol.
- Introducing the concept of risk into the guidelines is highly questionable as there is no attempt to put this in context with other risks such as poor diet and lack of exercise. This lacks a common sense approach and will undermine the credibility and effectiveness of the guidelines.
- The link between drinking and cancer is over-simplified since drinking can have a range of effects on cancer risk and there is clear established evidence of a protective effect in some cases.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- We do not think consumers will regard the advice as sensible or balanced since the risks of alcohol consumption over the long term cannot be treated in isolation from the other risks associated with peoples' lifestyles and therefore it is not possible from the guidelines to make well-informed decisions.
- Consumers will be confused by the reference to a 1% increase in risk with no explanation of the comparison with 'risks from some other regular or routine activities'.
- Use of terms such as 'safest' and 'low level' are confusing and misleading and the guideline fails to acknowledge the overwhelming body of evidence from across the World that moderate drinking above these levels can reduce mortality from all causes. To dismiss this evidence is potentially damaging to the credibility of the guidelines with consumers and reveals serious flaws in the process behind their formulation.

• The move to weekly as opposed to daily guidelines is confusing for people who have become used to daily guidelines which are much easier to follow. It may result in people thinking they can consume the weekly allowance in one or two occasions, especially given the message that there should be several alcohol free days.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- As 5 above this pays no attention to the fact that alcoholic drinks vary in strength, so consumers choosing to drink lower strength drinks rather than abstain on some days has not been considered
- There is no explanation of what a 'heavy drinking session' is and given this, it is impossible for anyone to consider what the risk is over the long-term. It is not credible to suggest that one or two heavy drinking sessions will increase the risk of death from long-term illness
- It is unclear if people choosing to drink fewer than 14 units per week need to spread this over three days or more.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- This guideline is seriously misleading and ignores the well-recognised body of evidence which establishes a link between regular moderate drinking and lower mortality. This has led to various experts from around the World commenting publicly on the new guidelines inconsistency with the evidence base, which seriously undermines the credibility of the guidelines.
- For this reason the guideline fails to enable people to make an informed choice and this could have a serious impact on how consumers respond to further guidance on health and wellbeing related to diet, lifestyle, obesity, lack of exercise, etc
- Given the risks associated with simply being alive, it is completely misleading to establish a simple link that the more alcohol you drink, at any level, the more you increase the risk of becoming ill.
- Equally disturbing, the guideline implies that avoiding alcohol may offer protection from developing illnesses since there is no reference to the risks associated with other lifestyle or environmental factors

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- This ignores the fact that a similar outcome could be achieved by switching to lower-strength products
- While this advice may be helpful and justified for heavy drinkers or in the event of a heavy drinking session, we don't think it is credible for those drinking within the guidelines and could be misunderstood leading to them drinking more on a single occasion.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

- We are unclear what is meant by 'risky places and activities'. This is likely to be confusing for consumers and, given the detail within this guideline, it needs to be specific to be of any use.
- The guideline makes no reference to the widely accepted evidence-based view that men and women generally have different tolerances to alcohol
- The combination of short term and long term risks and the consideration of risks from accidents, etc alongside disease, etc is confusing in the extreme and does not provide people with useful clear information. The formation of the guideline based on a combination of primarily long term risks for women, but short-term acute risks for men is seriously flawed and will make it impossible for consumers to make decisions based on this advice.
- It is also a missed opportunity and a demonstration of the negative bias to the guidelines that there is no consideration of the social and wellbeing benefits to wellbeing experienced by millions of people through enjoying alcohol responsibly in sociable and safe environments such as pubs.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We have no view on this point, other than the fact it is the case that most other countries have daily guidelines and consistency internationally would be preferable.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Not our area of competence, but we believe the guidance is clear.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Not our area of competence.

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-30 21:32:52

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Generally poor.

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

You are asking a barristers' question.

The "guidelines" are indeed clear, but both they and the framing of these questions concerning them make very broad assumptions about the integrity of the data on which they are based, and in turn, the integrity of those charged with interpreting said data. It is entirely clear, in both cases, that these assumptions are without foundation.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Again, a barristers' question.

The "guidelines" are indeed clear, but both they and the framing of these questions concerning them make very broad assumptions about the integrity of the data on which they are based, and in turn, the integrity of those charged with interpreting said data. It is entirely clear, in both cases, that these assumptions are without foundation.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

No – clarity would require believable evidence which did not contradict directly all previous evidence, and was free of a clear political agenda.

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

No. I don't understand why the proposed guidelines are now the same for men and women, or why there isn't a daily recommended intake anymore. This is confusing as there is no advice on how much alcohol is recommended to drink each day. I won't be able to make an informed decision on my alcohol intake from this advice as I don't understand why these decisions have been reached.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

No – I would prefer the government to admit that the economy requires me to drink in order for it to function. It would be less complex if they would simply do the sums in terms of the actual duty which it is required that each citizen consume (broken down into any time interval which seems convenient) and legislate that said duty, along with VAT, is made plain in the pricing structure at the point of purchase.

If they did that, a great deal of money could be saved through the forcible removal of 'panels of experts' from the public funding teat to which they are currently so tenaciously attached.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant woman should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies 2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy 3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-31 09:46:53

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:
Member of public

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

An educated reader of the guidelines will be left in doubt as to their credibility because it is scientifically established that men and women are affected differently by alcohol, and that there are wider social and health impacts than the narrow view re. some types of cancer.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

As in question 4, it is scientifically disputed as to the "safe" level (especially for men) and the assertion that risks from illnesses increase with "any amount" of alcohol is again misleading by omission - there are some benefits to health, social enjoyment and mental health. Additionally, who cares about a 1% risk over a lifetime - I've been drinking responsibly at above the previous (arbitrary) recommended level for 43 years now and am still in good health.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

If you don't trust the analysis, which seems biased, you will ignore the advice. You also assume that people have a low risk appetite, which is clearly not the case - not everyone wants to live forever.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

There is no information about what other physical and mental health risks increase with no/lower alcohol and how they compare with the narrow range of illnesses including within the advice. The male limit is set unrealistically low compared with females and other civilised countries - and one suspects some ulterior political motive from the panel of "experts".

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The guideline is of no relevance to me - I do not wish to reduce my drinking as I have enjoyed it in social surroundings for many years now. The quality of my life would be poorer if I were to curtail or abandon this.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Way too complicated for ordinary people. Plus lacking in credibility as there is recognition of some physical variation in people, but not male/female! The advice also mixes short term and longer term risks, which are quite different in nature and outcome. There is also no recognition (as there is in some countries) of the lower risk taken by experienced people (for instance recognising drunkenness and violent behaviour in others, knowing when to stop drinking).

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Everyone is different and no one number is representative (particularly if male/female differences are ignored). It's my choice how much I drink and when, and I am tempered in that by the fact that I have a family to keep, a job to go to and drink-drive laws to obey. I've never needed the nanny state and never will.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

NOFAS-UK

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Healthier Futures

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We support that the low risk drinking guidelines does not advise on a specific number for single occasion drinking. Our position is based on the following Best possible communication: We believe low risk drinking guidelines needs to be easy to communicate to make the public aware and understand the guidelines, and should therefore only be one number (14), with the additional information that this amount should be spread on several days. Introducing a number for drinking on a single occasion can confuse the messaging, and as a result disrupt the main message of 14 units per week. Risk of higher consumption levels perceived as low risk drinking: If a single occasion low risk drinking guideline were introduced, we believe this would be the dominant guideline remembered by the consumers compared to the weekly guideline, and thus confuse consumers on what the limit for low risk drinking is. If for example a single occasion guideline is set to 7 units, we end up risking that consumers think they are within the low risk drinking patterns by never consuming more than 7 units per occasion. If this is repeated several times a week, consumers easily exceed the weekly limit of 14

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Response ID ANON-FRVK-5YZ3-M

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-31 11:30:51

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Nhs

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:
NOFAS-UK

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I think that the guidance should state in clear simple language that there is no known safe level of alcohol consumption in pregnancy, and no time when pregnant or trying to become pregnant when it is safe to drink alcohol.

The reason for this is that although risks are low with low consumption, and may differ at different times, we know that any foetus can be affected at any time by alcohol exposure. The current wording is correct but unclear and may lead to the conclusion that there isn't much to worry about, so the fact that there is no safe level of alcohol or time to drink needs to be underlined.

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Response ID ANON-FRVK-5YBJ-K

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-31 12:07:49

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It should also say, 'seek help' from your GP or another person if you are unable to do this.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

"units" confuses people, unless the pubs, sellers of alcohol start posting exactly how many 'units' are contained in a given drink

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The CMO was more direct in her public statements. This language is too confusing. It should say clearly that alcohol exposure in utero can lead to brain damage (using those words). It should be specific and say the parts of the brain that are most likely to be affected are those associated with executive functioning - and that as a result, a child with FASD can have lifelong struggles with cause/effect, mathematical concepts and time, and controlling behaviors. Specifically your "learning and behavioural disorders, which are long lasting and MAY be lifelong" is totally inadequate. The "may" is misleading - the condition cannot be 'fixed'. And the learning and behavior 'disorders' are symptoms of underlying, unseen physical injury to the brain, not disorders that can be cured.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

You should say clearly, "The brain damage and other physical disabilities related to FASD are 100% avoidable." Giving this figure "Most women either do not drink alcohol (19%) or stop drinking during pregnancy (40%)" implies that these stats are OK - they are not ok. Does the government have a goal that eventually all pregnant women will stop drinking alcohol in pregnancy or not? If so, you should comment that you aim for a higher number of women not drinking. You should advise women who have had alcohol in pregnancy to let their doctor and their child's doctor know, and remind women that many of the executive functioning deficits may not show up until the child is much older and approaching secondary school. It would be better to have a separate statement about the risks of drinking & pregnancy. Or at least to also publish this section separately.

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-31 12:09:28

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

There is precise measure of the cause (i.e. 14 units of alcohol per week) there is no precise measurement of the effect (i.e. to keep health risk low, increases risk from accidents etc).

If you can measure one why can't you measure the other?

It would be useful to know the direct relationship between alcohol consumption to various health risks so that a responsible individual can decide how much to consume according to how much risk they are prepared to take. The guidelines do not do this.

There is one mention of a risk being "around or a little under 1%" which is "comparable to risks from some other regular or routine activities". This statement is incomprehensible. (point 14)

Given that the research took into account "all these factors" and "carried out analyses to test the robustness" there are very few if any empirical data presented (point 15)

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

There is no explanation as to how the weekly guideline was chosen.

How is the number 14 arrived at?

Where did 21 come from?

Why are men and women now treated the same?

Why is there a one size fits all with no account taken of gender, age, weight etc?

The guidelines are vague, with the use of words such as "regular heavy drinking episodes".

What is meant by "such a pattern of heavy drinking on a small number of days?" (point 16)

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The focus is on a weekly limit of 14 units.

The daily limit is not specifically mentioned but by simple maths can be considered as 2 units per day.

However with the recommended 3 days off the daily limit becomes 3.5 units (interestingly similar to the previous 7 day limit of 21 units).

The credibility of the guidelines is questionable when the zero risk option is set alongside the low and increased risk. So the risks increase "with any amount you drink on a regular basis" (but we don't know by how much) and while the risks are low (how low?), there are "no levels of regular drinking that can be considered safe." (point 17)

So what is the recommendation? Moderate drinking or no drinking?

Are there any benefits that might compensate for the risk?

Are we being given the complete picture or a one sided view?

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

There is no risk measurement, other than supposedly not drinking at all equals zero increased risk.

Similar advice is given with just a different choice of words.

Have "several drink-free days" each week. Is "several drink-free days" the "3" mentioned earlier?

Ideally "several drink-free days" seems to be "7".

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

There is a basic issue of whether to consider the short term effects of alcohol alongside the long term effects.

While there is clearly potentially a link they are quite different issues.

They should be treated separately. To immediately draw attention to the long term risks when the point under consideration is single occasion drinking is quite wrong and indicates a level of confusion over the motives and message.

The issues with single drinking occasions are much clearer, the evidence, the risks, the implications are much easier to deal with.

There is an interesting point made that "some groups of people are likely to be affected more by alcohol". There is no mention of any groups likely to be more affected in relation to the 14 unit limit.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

As mentioned single occasion drinking should be treated separately.

Why is there no mention of the metabolic rate alcohol calculator?

It states that "it was important to make the scale of this risk clear to the public and it is spelled out in their report" why then is it not mentioned in any of the guidelines? (point 23)

And if the scale of risk is clear why does the guideline say "individual variation in short term risks can be significant"? Looks like the scale of risk has a very wide range.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Given the seemingly arbitrary weekly limit and given that "some groups of people are likely to be affected more by alcohol" any single figure of units per day would not seem to be very helpful.

In any case in figure can be deduced as 3.5 from other guidelines (see question 3).

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Does "planning a pregnancy" refer to men as well as women?

It is not entirely clear what is meant by "drinking heavily".

The guidelines are vague (e.g. use of the word "may", reference to a daily guideline of 1-2 units per day, having said that the group did not recommend "a specific number of units that you shouldn't drink more than on any occasion or day". (point 29)

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer (maximum 200 words):

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Adoption UK

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I found bullet Point 2 to be unclear.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

FAS with facial features is only seen if a mother drinks very early on in pregnancy. Therefore a child with facial features may have been damaged through unintentional use of alcohol, and if a mother stops using alcohol the damage is more limited. A child whose mother continues to drink through pregnancy is at much more severe risk of brain damage and arbd - FAS is not necessarily more severe than ARND - it is just easier to diagnose.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 What is your organisation?

Organisation:

[REDACTED]

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer (maximum 200 words):

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer (maximum 200 words):

There needs to be a zero tolerance to alcohol during pregnancy and before when trying for a family. Guidelines need to reflect this. I care for a child diagnosed as FASD and daily see the damage caused

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer (maximum 200 words):

Please do not play down the effects

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guidline should be no drinking during pregnancy - not 1-2 units.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

No - advise should be that alcohol is not consumed during pregnancy.

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Brown-Forman Netherlands BV

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer (maximum 200 words):

While a "unit" is defined elsewhere in government materials, it would be useful to translate units into mls of standard strength beer, wine, and spirits OR to show "standard" serves of beer, wine, and spirits with indicators of the number of units each contains. Providing this information in close proximity to the guidelines themselves could make it easier for consumers to understand the guidance and relate it to their own drinking experience.

The proposed guidelines take an important step forward by making periodic reference to the impact of drinking patterns on health and risk. Making this link even more explicit and helping citizens evaluate their own patterns through examples could be more useful than the blanket "not ... more than 14 units per week."

The inclusion of a weekly limit is fine, but communicating a recommended daily range or limit is important in order to give citizens guidance about pacing and drinking patterns.

The statement "The risk of developing a range of illnesses ... increases with any amount you drink on a regular basis" is not clearly explained nor quantified effectively relative to other activities or risk factors. Family history, environment, and other lifestyle choices create widely varying risks for individuals before they ever entertain the decision about whether to have a drink.

More specific comments follow in the subsequent sections.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer (maximum 200 words):

The Explanations of risk throughout the summary document are not easy to parse and apply to one's own situation. The long and short-term risks of binge drinking should be distinguished from the range of risks and benefits from moderate, regular consumption of alcohol. Without this clarification, the advice to citizens is muddled and of less value than if people are able to recognize their own drinking patterns, understand the relative risks related to those patterns, and then make informed choices about whether and how to drink alcohol. The risk of muddled advice is citizens are as likely to abstain completely out of fear (thereby increasing the population's risk of all-cause mortality) or ignore the advice completely, rather than trying to figure things out for themselves.

The statement that health risk arises from regular consumption [of any amount] of alcohol over time conflates regular moderate consumption and regular immoderate consumption into one piece of health advice. Not only is this contrary to a significant body of widely accepted scientific evidence, but it contradicts information widely publicized in the popular press over the last 30 years. If citizens are going to have confidence in the guidance given by the government it needs to make sense to them in the context of what they already know.

Finally, the explanation of how the weekly guideline was chosen is not easy to understand and appears to have ignored the previously mentioned body of widely accepted scientific evidence relating to the J-curve impact of moderate alcohol consumption on all-cause mortality and instead relied on results obtained from

inputting variables into a theoretical model.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The advice to spread one's drinking over 3 or more days is clear and sound. It makes sense to include daily consumption norms in the guidance and we believe the guidance could be further improved.

Even the proposed advice to spread consumption evenly over at least 3 days could lead to less than optimal decision-making. Dividing 14 units over 3 days would be nearly 5 units a day on 3 days each week. Even that is not a healthy drinking pattern on an extended basis -- particularly if those 3 days are successive each weekend.

Wouldn't it be better to say:

It's important to monitor and understand your drinking patterns in order to avoid injury and keep long-term health risks low. Do not ever consume all 14 of your weekly units in just one night. Do not ever drink with the objective of getting drunk. If you are going to have "big nights", limit them to a very few times a year and ONLY when you are with people you trust to look after you should you need it.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The explanations included with the proposed guidance attempt to address the not-easy-to-explain subject of risk. As noted earlier in these comments, the guidelines would be strengthened by putting the very "low risk" potentially associated with moderate alcohol consumption into context relative to other risks of daily living. Providing this context accomplishes two objectives: it makes the guidance easier to understand and makes it more likely to be accepted (and hence potentially more able to affect citizens' choices)

Asserting there is "no level of regular drinking that can be considered as completely safe" falls short of the guidelines' stated objective of providing "accurate information and clear advice ... in an open way, so [citizens] can make informed choices." Accurate and complete information would include reference to the equally low levels of risk associated with other activities of daily living to provide context and would acknowledge the significant and undisputed body of evidence that moderate alcohol consumption is associated with a reduction in all-cause mortality relative to both non-drinkers and heavy drinkers.

Assuming arguendo many citizens will read only the guidelines and not the explanations, it's particularly important to amend the "range of illnesses" guideline in order to avoid scare-mongering by overstating the potential risk by a significant margin. Even the explanation compounds the overstatement by stating ANY alcohol consumption can CAUSE cancer.

Furthermore, since the 1/3 reduction in the recommended weekly limit for men appears to relate to risks from accident or injury rather than chronic illness, it's not accurate to suggest their risks are the same as women's in this regard.

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This advice is clear, simple, and likely to be effective. The only potentially useful additions would be to state explicitly that having alcohol-free days should not justify increased consumption on the drinking days and to reiterate one should not cram one's weekly consumption into just one or two days if regularly consuming up to 14 units a week.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The advice is clear, but could be improved.

The language "... drinking alcohol regularly is linked to long term risks such as heart disease, cancer, liver disease, and epilepsy" should be deleted from the advice as it is not entirely accurate and has NOTHING to do with "Single occasions of drinking." Furthermore, the quoted language undermines the excellent advice given in the preceding language of the section.

The portion of the statement in the explanation that "Short term risks from heavy drinking in a short time also include ... conditions such as heart disease" should also be deleted. We are aware of no evidence that an episode of binge drinking contributes to, let alone causes, heart disease.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

While there can be value in simplicity, relying only on a daily limit poses some risks, too. Set it too low and it will have no credibility and will be largely ignored, set it high and some people will second-guess the limit and believe there is "head-room" above.

Alcohol is not a simple subject. Citizens need to learn about their own limits on single occasions and to understand the realistic potential consequences of their short and long-term drinking choices. The most valuable advice Government can give is simple, clear indications about how to think about one's drinking patterns and long and short-term consequences. Using daily limits or ranges in conjunction with a recommended weekly limit can give citizens a framework in which to evaluate their own patterns.

This particular advice is clear and practical. Applying a similar, practical approach to the rest of the Guidelines could do a great deal to improve citizens' understanding of their own drinking and the potential benefits and risks associated with it.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The guideline makes a valiant attempt to provide useful information to women without terrifying them. It is reasonably clear, but can be strengthened further.

For example, separating the paragraphs relating to drinking within the normal guidelines, binge drinking, and regularly drinking in excess of the guidelines would make it easier to distinguish the relative risks for FASD associated with each.

In all cases, women should be advised to discuss the subject openly with their doctor or midwife.

The inclusion of some social norming information is helpful and could be equally useful in other parts of the guidelines.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-31 15:18:16

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Northamptonshire Health and Wellbeing Board

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We do not believe sufficient emphasis has specifically been placed on individual 'mental health' impacts and also the wider impacts on the family and/or community be that of associated mental or physical health. We don't believe the catch all 'those with other health problems' is sufficiently specific for this critical health need which has often been overlooked.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I think putting a number on it could give justification for drinking that many units and a false sense of security.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It should say no alcohol - any is s risk. The only way to have no risk is to recommend 0- not just advise it as a 'safer optio'.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

If the answer was to recommend 0 alcohol there would be no risk of misunderstanding. It should be kept as simple and clear as that.

Response ID ANON-FRVK-5YBG-G

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-31 15:52:39

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:
CAMRA

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:
It is absolute tosh which ignores all the positive benefits of moderate consumption of alcohol, particularly real ale.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:
The advice is not scientific fact with the guarantee of certain illness or death for anyone not adhering to it. There is no mention of the benefits of moderate alcohol consumption.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:
No because it is totally incredulous.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:
As in 6 above.

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:
As in 6 above.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Everyone is different and I do not believe in an average alcohol intake

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It should be no level is safe. If women can't not have a drink they need support to stop completely. Most doctors and midwives are not trained in fas/fasd, once the baby's born the midwife doesn't see the damage done to the child as they grow. If a woman drinks during pregnancy it should always be noted on their file to see the future damage. I have 2 boys 1 adopted with probable fasd, the other we foster with fas, the permanent irreversible physical and brain damage due to only alcohol is scary. The youngest is seriously disabled, the eldest will need support all of his life. It's very sad and this could have been stopped with NO ALCOHOL during all of the 9 short months.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies 2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy 3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

There is no uncertainty alcohol damages babies growing in the womb. No amount is safe and the government should be liable for not supplying and believing this evidence. You are failing these children and then adults that cost the government and their carers a lot of money & stress.

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

UK Health Forum

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The UK Health Forum (UKHF) supports that the low risk drinking guidelines do not advise on a specific number for single occasion drinking.

Best possible communication: UKHF believes low risk drinking guidelines needs to be easy to communicate to make the public aware and understand the guidelines, and should therefore only be one number (14), with the additional information that this amount should be spread on several days. Introducing a number for drinking on a single occasion can confuse the messaging, and as a result disrupt the main message of 14 units per week.

Risk of higher consumption levels perceived as low risk drinking: If a single occasion low risk drinking guideline were introduced, we believe this would be the dominant guideline remembered by the consumers compared to the weekly guideline, and thus confuse consumers on what the limit for low risk drinking is. If for example a single occasion guideline is set to 7 units, we end up risking that consumers think they are within the low risk drinking patterns by never consuming more than 7 units per occasion. If this is repeated several times a week, consumers easily exceed the weekly limit of 14.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-31 18:25:20

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

UK & European Birth Mother Network - FASD

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Any amount of drinking can cause FAS not just heavy drinking. Every women is unique and how her body deals with alcohol is different so there is no safe amount or better time to drink as every case is different

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Uncertainties cause confusion and saying low level won't cause FAS is misleading

Interested to know who expert group is as the women experts who have children with FAS/FASD have not been consulted , and every women's drinking pattern was different yet they have a child with FASD

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-31 19:09:57

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The sentence construction is convoluted and confusing. I suggest

14 units per week is the maximum you should drink to stay safe and keep health risks from alcohol low

If you do drink 14 units per week, spread them evenly over at least three days - preferably more. One or two heavy drinking sessions increase your risk of dying from long term illness, as well as from accidents and injuries

3 and # 4 are ok

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It's all understandable, but each explanation could be improved and made clearer by shortening sentences and improving punctuation.

Why not get the Plain English people to look at it and improve?

I'm an editor and could do this for you

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

If this is for general public consumption, it's really convoluted and not clear enough. Simplify the language, make the outcomes of drinking in pregnancy clearer and the actions pre-pregnant or pregnant women should take easier to understand

The whole thing needs a decent edit - it's really quite poorly written and unnecessarily convoluted. The people who need to understand it most may not be able to decipher what you're on about.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It doesn't seem particularly sensible to reassure women who have drunk before knowing they were pregnant, when it's quite likely their babies will be harmed by their drinking.

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-31 19:54:36

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:
NHS

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I think the numerical value of 5-7 should be clearer, not just hidden in the explanation as most people will find this helpful. I understand the reasons for not setting an absolute level but I think the expert group underestimate the need for clarity quickly when looking at guidance

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

See above ...yes I agree that this would help.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Shorter and snappier needed!!!!

"Do not drink alcohol if you are pregnant" would suffice...

Keep it clear and simple

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Yes but...

For the majority please simplify and keep it clear!

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

British Society of Gastroenterology Liver section

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Yes it's clear but may benefit from being more direct. "Do not drink more than 14 units a week to avoid damaging your health"

Comments on cancer risk etc are well made and i suspect not well appreciated.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The phrase 'heavy drinkin session' is too imprecise - see notes. Best to define and add numbers in terms of units and amount of alcohol as examples.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Needs to be more clear about the values and volumes

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Yes and examples of volumes

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-31 20:10:51

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer (maximum 200 words):

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer (maximum 200 words):

This should be made explicit that any amount of alcohol can harm the fetus and no level of consumption is safe once you know you are pregnant. It should clearly state at the beginning of the text that pregnant women should not drink at all.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer (maximum 200 words):

To have a precautionary approach the guidelines should recommend no alcohol at all. FAS and FASD are completely preventable by telling pregnant women that no level of alcohol is safe.

Introduction

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 What is your organisation?

Organisation:

www.manageable.org.uk

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

There needs to be total clarity. It is not known how much alcohol is dangerous to the unborn baby. We therefore need to say -

No alcohol = no risk

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Totally transparent advice is required. Alcohol is the most powerful teratogen and must be avoided if a woman is planning to become pregnant, and throughout the entire pregnancy. This is the only safe advice to provide.

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

N/A

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Although the guideline is a step in the right direction, women are still paying heed to anecdotal evidence (e.g. "I drank whilst pregnant and my child is fine"). The guideline should be restated to make it clear that the only way to avoid the risk of a child being born with FAS is not to drink at all during pregnancy or whilst trying to conceive.

By stating that if a woman had drunk before finding out that the risk might be small is understating the situation and gives those who are trying to conceive, or who do not use protection when they have been drinking heavily, an excuse when they could still be doing some damage to their unborn child.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies 2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy 3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Submitted to UK CMO Guidelines Review
Submitted on 2016-03-31 21:52:04

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The guideline is clear but the method of communication to the public is not. At present there is a Responsibility Deal agreement that alcohol labels will include the number of units in the product, the low level risk for consumption and a pregnancy message. Recommendations for compliance with this are made by the Portman Group on their website. An independent survey has found compliance with the three elements approaching 80% and best practice clarity in many labels. However the labels are extremely small and cannot easily be seen or read by the public.

The Portman Group website shows an illustrative label for the guidance of their members which shows the health label to be about 4 times the size of the bar code and the font size to be substantially larger than that used for the bar code number. On a selection of alcohol products which I have in my house the average health label was only 1.26 times the size of the bar code while the font size was 6-7 compared to the bar code number which was 11 or 12.

The advantage of clear and comprehensive product labelling is that it is present at the time of the drinking episode. It is also constantly available for parents and healthcare professionals to advice children and members of the public. The usefulness of the CMO guidance will be seriously reduced if the clarity of the health information on alcohol labels is not improved.

In the USA the health warning occupies approximately 25% of the front label and this scale of requirement needs to be coupled with the new CMO guidance to ensure its impact in the UK is maximized.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The advice is clear that total unit consumption per week should be no more than 14 units and this should be spread over several days. To introduce another figure would confuse the overall message.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

FAS Aware Manchester

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The guidelines need to be much clearer and give a clear message of no alcohol during pregnancy.

FAS and FASD is lifelong and is 100% preventable. Parents need this information to be clear, professionals need to update there knowledge and be giving out this same clear message.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The message is still unclear, the only way to prevent FAS/FASD totally is to not drunk at all.

Submitted to UK CMO Guidelines Review
Submitted on 2016-04-01 11:00:49

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Start360

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The guideline is not clear - Plain English should be used throughout the campaign and it should be aimed at different audiences, not just medical professionals.

Many people do not know what a unit is or how it can vary depending on the strength of different brands.

We suggest focussing on four key, simple messages:

14 units maximum per week

Alcohol is a poison and long term drinking is bad for your physical AND mental health

Try to have plenty of drink-free days

If you're drinking alcohol, drink water too

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

See q4

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

See q4

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

See q4

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

See q4

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This is clearer but needs to be simplified for some audiences.

Other suggestions include:

Prominence of the message about drinking water

Calorie content being displayed

Stressing that single drinking occasions can also lead to bad judgement

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This is clearer but needs to be simplified for some audiences.

Many people do not know what a unit is or how it can vary depending on the strength of different brands.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We welcome the message that the safe drinking level in pregnancy is no alcohol at all.

The guidance on early pregnancy could be read as contradictory and imply that it is OK to drink during the early weeks.

However at the same time it is important to ensure that pregnant women are not demonised and are properly supported if they have consumed alcohol while pregnant, before becoming aware of the fact.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

See above.

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Balance, The North East Alcohol Office

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We support that the low risk drinking guidelines does not advise on a specific number for single occasion drinking. We believe low risk drinking guidelines needs to be easy to communicate to make the public aware and understand the guidelines, and should therefore only be one number (14), with the additional information that this amount should be spread over several days. Introducing a number for drinking on a single occasion can confuse the messaging and as a result disrupt the main message of 14 units per week.

If a single occasion low risk drinking guideline was introduced, we believe this would be the dominant guideline remembered by the consumers compared to the weekly guidelines, and thus confuse consumers on what the limit for low risk drinking is.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Submitted to UK CMO Guidelines Review
Submitted on 2016-04-01 11:29:12

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Aston Manor Cider

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We believe that guidelines are an important part of the information, education and support available to people about responsible drinking.

For guidelines to be effective, they have to be clear, consistently communicated, credible and likely to change behaviour. We think the new guidelines fail on all counts.

The previous guidelines, allied with other information and education, have led to a significant improvement in consumer understanding in the last 10 years. Average consumption levels have reduced consistently and many more people now drink responsibly – progress made could be undermined to a point where a dramatically improving position is reversed.

The new guidelines are anything but clear. There is conflicting information and the guidelines are inconsistent with the consensus advice from other countries. It is not possible to consistently communicate these guidelines. Amongst many inconsistencies, the promotion of 'no safe level' of consumption and guidance of '14 units a week' is fundamentally flawed to the point that (consumer) confidence in the guidelines would be very low, in our view.

Given the time and investment in establishing the previous guidelines, there has to be a very compelling case to suggest new advice and that a universal guideline (for men and women) should be adopted – and this case is not supported.

The many reports that challenge the evidence base for the new guidelines means that many consumers are unlikely to regard them as credible.

The considerable variance between the UK and other countries that the new guidelines represent, the adoption of an equal guideline for men and women, and the fact that guidelines are based on less than 1% risk to consumer health over a lifetime, are all major reasons why the new guidelines may not be regarded as credible.

As a result consumers are unlikely to change behaviours and progress made may be lost.
(See annex for further details)

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The proposed weekly guideline is not as clear or as concise as the previous advice – which has become widely recognised and understood in our view.

With many drinkers having changed behaviour in relation to alcohol, in part, due to the previous guidelines there needs to be strong and compelling evidence to consider new advice as credible and something to act upon. We do not believe this is the case.

The many challenges by experts that have been reported, the significant variance with advice given by other countries, the alignment of guidance for men and women, and the fact that the guideline is based on less than 1% risk to health over a lifetime, are all reasons why consumers may not find the guideline credible.

If consumers are confused due to a lack of clarity or not convinced because of the many challenges on the evidence used (or interpretation) then they will not be motivated to change behaviour.

(See annex for further details)

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We believe there is a high risk consumers will not understand the new guideline or will ignore it.

Highlighting the benefit from avoiding one or two heavy drinking sessions is valid, though the way in which this is presented is (potentially) confusing and the change in the nature of the risk is not explained.

It would be better to say that one or two heavy drinking sessions should be avoided. With a weekly guideline of 14 units, it will be evident and clear that this means consumption should be across three or more days.

(See annex for further details)

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The information is not clear and not likely to be readily understood.

Bringing attention to things with a very low level of risk is a complicated message to convey and highly likely to undermine important messages about the risks of drinking at higher levels.

Also, as the evidence base for these statements has not been published, it is not possible to know whether this is a credible message for consumers.

This guideline, and the new advice as a whole, does not take account of the strong and compelling evidence that moderate alcohol consumption can be beneficial to health. This evidence is well documented.

(See annex for further details)

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

This guideline is not clear or compelling and is likely to give rise to confusion.

The existing guidelines are widely understood and, in our view, have made a significant contribution to the reduction in average consumption and the lower incidence of heavy drinking sessions.

In this context, new guidelines must be simple and concise.

Information in the public domain already identifies that alcohol free days can be a good idea; however, this guideline suggests that alcohol free days are only relevant for those consumers that want to reduce their overall consumption.

(See annex for further details)

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

For guidelines to be effective, they have to be clear, consistently communicated, credible and likely to change behaviour. We think this guideline fails on all counts.

Whilst the evidence may support much, or all, of what is included, communication of this nature needs to be carefully targeted and managed.

There is no information on the level of risk, so consumers are poorly informed. When there is an immediate risk of a severe injury, then communication around that should be targeted and relevant – this guideline is not.

Our view is that consumers will regard an over-simplified and unquantified claim as not credible. As a result they may ignore it and this will inform, negatively, their wider view on the new guidelines.

In the last 10 years, a combination of the previous guidelines, education and other information has had a really positive effect on consumer behaviour. Many people now have a much healthier relationship with alcohol.

To replace the previous guidelines with something not regarded as credible may undermine or, worse, reverse this established and positive trend.
(See annex for further details)

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Previous evidence supports a range (of units) rather than an absolute number. This is because of a number of valid variables.

It is possible to communicate a range successfully – as with the previous guidelines.

To suggest a single absolute number without the evidence to support that claim undermines consumer confidence in this guideline and the advice more generally.

If information and claims are not seen as credible, consumers will not act upon them.

(See annex for further details)

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant woman should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

HOW TO KEEP HEALTH RISKS FROM DRINKING AT A LOW LEVEL:

PUBLIC CONSULTATION ON PROPOSED NEW GUIDELINES

Aston Manor Cider supported the work to develop the Annex presented by the National Association of Cider Makers (NACM). As we agree with the material in that document, it appears below as the Annex we also wish to submit.

Executive Summary:

- Guidelines are important for helping people consume alcohol responsibly. These guidelines must be clear, understandable, relevant and evidence-based if they are to help people make informed choices.
- The number of consumers drinking within the previous guidelines has increased by 19% since 2007 and the vast majority of consumers drink responsibly. (Office of National Statistics)
- The new weekly guidelines (14 units per week) now recommend the same levels for men and women, breaking with established international precedent
- In formulating the new guidelines the link between alcohol and cancer has been over-simplified. The weighting of information around relatively low level risk could result in the consumer ignoring the greater risks associated with higher drinking levels.
- Alcohol has a range of effects on cancer risk including no impact on certain cancers, and in some cases, a protective effect. This is not being openly and accurately communicated to consumers.
- There is also overwhelming international evidence that moderate consumption of alcohol can have protective effects against other conditions such as cardiovascular disease and cognitive decline. These health benefits have been down played in the determination of the new guidelines.
- The message that there is no safe level of alcohol does not provide consumers with truthful and contextualised information about the relative risks of alcohol consumption, and risks undermining other information contained in the guidelines. This message is based on the suppression of the protective effects of alcohol and an amplification of the links between alcohol and cancer.
- National media, leading commentators, politicians and members of the public have been overwhelmingly critical of the new guidelines. This reflects the significant public feeling that the guidelines are out-of-touch and run the risk of being ignored, potentially leading to mistrust in public health advice on other issues.
- The process of the guidelines review has not been transparent and the evidence base has not been made available, resulting in a high level of media criticism. This will impact credibility and consumer response to the new guidelines.

1. UK Context - alcohol trends and drinking within guidelines

1.1 The majority of adults were drinking within the previous daily guidelines. These guidelines were increasingly understood and adhered to by consumers:

- 70% of adults in Great Britain drank within the CMO's lower risk daily guidelines even on their heaviest drinking day in a week. (Office of National Statistics)
- The number of adults drinking within the previous daily guidelines had increased by 19% since 2007 (Office of National Statistics)

1.2 During the last decade, harmful drinking and alcohol-related harms have been in decline:

- Binge drinking has fallen by 20% since 2007 (Office of National Statistics)
- Alcohol related violence has fallen by 34% since 2004 (Office of National Statistics)
- The rate of alcohol-related deaths has fallen to its lowest level since 2002. (Office of National Statistics)
- The number of children (11-15) drinking alcohol has fallen by 36% since 2003 (Office of National Statistics)
- Under-18 hospital admissions due to alcohol have fallen by 41% in the last 6 years (Public Health England)
- Drink driving related accidents decreased 47% between 2003-2012 and are currently at a record low (Department for Transport)

1.3 In the UK, alcohol consumption overall is falling and we now drink less than many of our European neighbours:

- Total alcohol consumption has fallen by 19% since 2004 (HMRC and BBPA)
- The UK drinks less alcohol than: Germany, France, Portugal, Ireland, Poland, Slovenia, Luxembourg, Croatia, Finland, Latvia, Serbia, Slovakia, Czech Republic, Hungary, Romania and Lithuania (WHO Global Figures - 2014)

2. The same guidelines for men and women

2.1 The established international precedent, in 30 countries worldwide, is that men and women are set different guidelines reflecting differences in alcohol metabolism due to body size and weight, as well as lower body water content and higher body fat content of women.

- Aside from the UK, there are only five other countries that recommend the same guidelines for men and women: Australia, Netherlands, Albania, Guyana and Grenada

2.2 The UK now has one of the strictest guideline levels for male consumption of anywhere in the world and is nearly half that of comparable countries like the US or Canada - countries that have conducted recent reviews of alcohol guidelines, based on the same international evidence base.

- In developing the Guidelines the expert panel advising the Chief Medical Officer examined evidence from Canadian and Australian models to help develop their methodological approach. However, the resulting UK guidelines were much lower than guidelines in either Canada or Australia: Canada (review: 2011) - advises that women do not exceed the UK equivalent of 17 units per week and men do not exceed UK equivalent of 25 units per week. Australia (review: 2009) - advises that men and women do not exceed the UK equivalent of 17.5 units per week.

- In the same week that the Chief Medical Officer announced the new UK revised guidelines, the U.S. published their response to a similar review. In contrast to the U.K. experts, those involved in the U.S. process reached the conclusion that there is no reason, based on available evidence, to warrant a downward revision of previous recommendations, which are higher than those issued in the U.K. - 14 drinks per week for a man and 7 drinks per week for a woman (UK equivalent - 24 units per week for men and 12 units for a woman)

- For a full list, see: IARD, International drinking guidelines for general population.

3. Alcohol & Cancer

3.1 In formulating and communicating the new guidelines, the links between alcohol and cancer have been over-simplified and the full picture regarding alcohol and cancer has not been fully and fairly communicated.

- Increased cancer risk is most significantly associated with heavy drinking patterns. (See IARD Review, Drinking and Cancer: <http://www.iard.org/wp-content/uploads/2016/02/HR-Cancer.pdf>)

3.2 The international evidence base shows that the link between alcohol and cancer is not as straightforward as the new guidelines and surrounding communications from the CMO suggest. Alcohol has different impacts on a range of cancers including no impact on certain cancers. To accurately and fairly communicate risk to consumers, all cancers should be taken into account rather than only highlighting examples where alcohol does increase risk.

- There are a range of major cancers including ovarian and urinary bladder cancer, brain cancer, prostate cancer and lung cancer where the international evidence base shows no association to alcohol consumption.
- For certain cancers, alcohol consumption has been found to have some protective effect, including renal cancer and lymphatic cancers (such as non-Hodgkin's Lymphoma).

(Source: IARD Review, Drinking and Cancer, <http://www.iard.org/wp-content/uploads/2016/02/HR-Cancer.pdf>)

- See Annex B: IARD, Brief Analysis of the evidence on drinking and health underlying the 2016 UK guidelines

3.3 There is a link between alcohol and increased risk of breast cancer. However, the new UK guidelines, and the public language used by the Chief Medical Officer, fail to put into context the relative risks of alcohol consumption compared to other common factors that significantly increase the risk of breast cancer such as Hormone Replacement Therapy (HRT), shift work, and the contraceptive pill.

- The government provides guidance on HRT (a WHO listed class 1 carcinogen), shift work and the contraceptive pill, clearly explaining the links to breast cancer and putting risk into perspective. This is in stark contrast to the new 'no safe level' guidance given

4. Health benefits and the protective effects of alcohol

4.1 There is overwhelming international evidence - and widespread scientific consensus - that total mortality among moderate drinkers is lower than among non-drinkers and that moderate consumption of alcohol can have protective effects against, for example, cardiovascular disease and cognitive decline.

- IARD Review, Drinking and Cardiovascular Health:

- o "Cardiovascular disease (CVD) is the leading cause of death and disability in the world, killing over 17 million people each year. CVD is one of the main Non Communicable Diseases (NCDs), accounting for 37% of all NCD-related deaths worldwide, and represents a considerable health, social, and economic burden globally.

- o The relationship between alcohol and CVD is complicated and depends on the pattern of drinking. While heavy consumption is a risk factor for CVD, light to moderate drinking has been identified as protective against several diseases among some groups of individuals.

o While the findings surrounding the cardioprotective effects of alcohol consumption have been challenged by some research, the biological mechanisms by which drinking affects CVD have been extensively studied and are well documented."

4.2 In the US, the most recent country to review alcohol guidelines, the government clearly acknowledges the significant number of lives saved due to moderate alcohol consumption:

- The US government's National Institute on Alcohol Abuse and Alcoholism state that:

"It is estimated that 26,000 deaths were averted in 2005 because of reductions in ischemic heart disease, ischemic stroke, and diabetes from the benefits attributed to moderate alcohol consumption."

4.3 International studies show alcohol can also have a protective effect against cognitive decline.

- Almeida et al (2014) - "Abstainers and irregular drinkers had higher odds of cognitive impairment than regular drinkers... Alcohol consumption, including heavy regular drinking and abuse, is not a direct cause of cognitive impairment in later life."
- Hoang et al (2014) - "Increasing consumption over time (>0 drinks/week) was not associated with risk of cognitive impairment. Decreasing consumption by >0.5 drinks/week was associated with increased risk"
- Ruitenberg et al (2002) - "These findings suggest that light-to-moderate alcohol consumption is associated with a reduced risk of dementia in individuals aged 55 years or older. The effect seems to be unchanged by the source of alcohol." This is a key study as it is a cohort study of nearly 8,000 people and it finds a near halving of risk of dementia among drinkers. Also important is that this effect does not vary by drink type, whereas some of the literature finds effects isolated to red wine drinkers. Finally it discusses the etiology of the protective effect hypothesising that alcohol's effect on the vascular system which affects dementia risk.

5 'No safe limit' of alcohol & communicating risk to consumers

5.1 One of the main changes to the guidance is that the Chief Medical Officer is now advising there is no 'safe' level of alcohol consumption, i.e. that there is no level of consumption at which the benefits of alcohol outweigh the harm. This statement is misleading, running contrary to the overwhelming international evidence base (see above).

- Professor Sir David Spiegelhalter (President-elect) & Professor Peter Diggle (President) of the Royal Statistical Society have written to the Health Secretary Jeremy Hunt regarding the new alcohol guidelines, stating: "We are concerned that, in their recent communications about alcohol guidelines, the Department of Health did not properly reflect the statistical evidence provided to the Expert Guideline Group, and this could lead to both a loss of reputation and reduced public trust in future health guidance."

Furthermore, the letter states:

"There was consistent downplaying and even denial of benefit, with the Press release saying that "the protective effect of alcohol against heart disease has now been shown not to apply to men", which directly contradicts the estimates published in the Expert Group Report.

The potential harms from cancer were repeatedly emphasised, even though the modellers concluded these were outweighed by the reduction in strokes and heart disease for low consumption in both men and women.

No mention was made of the harms of additional consumption, and that these were higher in women.

Further, the tone of the Department of Health website was very prescriptive, saying men 'should' drink less than 14 units."

That most activities that people undertake on a daily basis - e.g. driving to work - carry some risk, and people need to make informed choices about the level of risk that they are prepared to accept."

5.3 National media, leading commentators, politicians and members of the public have been overwhelmingly critical of the new guidelines. This reflects the significant public feeling that the guidelines are out-of-touch.

6. Importance of labelling to the communication of the Guidelines

6.1 As part of the Responsibility Deal the industry voluntarily labelled 80% of products on shelves with the previous Chief Medical Officer's Guidelines. The process to date has failed to recognise the need for a reasonable transition to any change of messages. New guidelines were publicly announced without notice, creating uncertainty for businesses.

- An independent audit conducted by Campden BRI in 2014 found that the industry had delivered on its pledge and reported that 83% of products contained the previous Chief Medical Officers Guidelines, this is an increase from just 5.9% in 2008. <https://responsibilitydeal.dh.gov.uk/wp-content/uploads/2014/11/Campden-BRI-Audit-of-PHRD-labelling-compliance-2014-FINAL-report-October2014-final.pdf>

- However, Department of Health (DH) provided no prior warning of the significant change and did not consult industry on how the changes may impact them or prepare an economic impact assessment;

- Furthermore, the Department of Health provided no guidance on the validity of the previous guidelines, only stating that they were out of date overnight. Also, the DH failed to provide any assurance initially that products labelled with the daily guidance could continue to be sold, whilst communication of the guidelines is still subject to consultation.

- Given the strict law around labelling this created a significant amount of needless uncertainty as to the legality of products and, in the absence of new wording which is still under consultation, threatened to force producers to remove the guidance which would fracture the coalition that delivered the 80% pledge

6.2 Transition periods are vital for industry

- It is important to note that the voluntary commitment to labelling was made in March 2011 and took nearly two years to complete. It is expensive and takes time for labels to be designed, produced placed on bottles and for those bottles to reach the market.

- Additionally, alcohol is a product that can remain in the supply chain and on shelf for a significant amount of time after they have been produced and labelled. This increases the risk of consumers being confused by multiple different sets of information.

- In the recent EU Reg 1169/2011 on food information to consumers, the transitional measures (art 54) allowed food placed on the market up to the day the regulation was published to be marketed until stocks of the food were exhausted. This legislation was published in Dec 2011 but did not come into force until Dec 2014. The FSA stated that this was required as "The three year transition period allows businesses to make the necessary changes to their processes and labelling designs in order to meet the provisions laid out in the legislation." <https://www.food.gov.uk/science/allergy-intolerance/label>

**HOW TO KEEP HEALTH RISKS FROM DRINKING AT A LOW LEVEL:
PUBLIC CONSULTATION ON PROPOSED NEW GUIDELINES**

Aston Manor Cider supported the work to develop the Annex presented by the National Association of Cider Makers (NACM). As we agree with the material in that document, it appears below as the Annex we also wish to submit.

Executive Summary:

- Guidelines are important for helping people consume alcohol responsibly. These guidelines must be clear, understandable, relevant and evidence-based if they are to help people make informed choices.
- The number of consumers drinking within the previous guidelines has increased by 19% since 2007 and the vast majority of consumers drink responsibly. (Office of National Statistics)
- The new weekly guidelines (14 units per week) now recommend the same levels for men and women, breaking with established international precedent.
- In formulating the new guidelines the link between alcohol and cancer has been oversimplified. The weighting of information around relatively low level risk could result in the consumer ignoring the greater risks associated with higher drinking levels.
- Alcohol has a range of effects on cancer risk including no impact on certain cancers, and in some cases, a protective effect. This is not being openly and accurately communicated to consumers.
- There is also overwhelming international evidence that moderate consumption of alcohol can have protective effects against other conditions such as cardiovascular disease and cognitive decline. These health benefits have been down played in the determination of the new guidelines.
- The message that there is no safe level of alcohol does not provide consumers with truthful and contextualised information about the relative risks of alcohol consumption, and risks undermining other information contained in the guidelines. This message is based on the suppression of the protective effects of alcohol and an amplification of the links between alcohol and cancer.
- National media, leading commentators, politicians and members of the public have been overwhelmingly critical of the new guidelines. This reflects the significant public feeling that the guidelines are out-of-touch and run the risk of being ignored, potentially leading to mistrust in public health advice on other issues.
- The process of the guidelines review has not been transparent and the evidence base has not been made available, resulting in a high level of media criticism. This will impact credibility and consumer response to the new guidelines.

1. UK Context - alcohol trends and drinking within guidelines

1.1 The majority of adults were drinking within the previous daily guidelines. These guidelines were increasingly understood and adhered to by consumers:

- 70% of adults in Great Britain drank within the CMO's lower risk daily guidelines even on their heaviest drinking day in a week. (Office of National Statistics)
- The number of adults drinking within the previous daily guidelines had increased by 19% since 2007 (Office of National Statistics)

1.2 During the last decade, harmful drinking and alcohol-related harms have been in decline:

- Binge drinking has fallen by 20% since 2007 (Office of National Statistics)
- Alcohol related violence has fallen by 34% since 2004 (Office of National Statistics)
- The rate of alcohol-related deaths has fallen to its lowest level since 2002. (Office of National Statistics)
- The number of children (11-15) drinking alcohol has fallen by 36% since 2003 (Office of National Statistics)
- Under-18 hospital admissions due to alcohol have fallen by 41% in the last 6 years (Public Health England)
- Drink driving related accidents decreased 47% between 2003-2012 and are currently at a record low (Department for Transport)

1.3 In the UK, alcohol consumption overall is falling and we now drink less than many of our European neighbours:

- Total alcohol consumption has fallen by 19% since 2004 (HMRC and BBPA)
- The UK drinks less alcohol than: Germany, France, Portugal, Ireland, Poland, Slovenia, Luxembourg, Croatia, Finland, Latvia, Serbia, Slovakia, Czech Republic, Hungary, Romania and Lithuania.
(WHO Global Figures - 2014)

2. The same guidelines for men and women

2.1 The established international precedent, in 30 countries worldwide, is that men and women are set different guidelines reflecting differences in alcohol metabolism due to body size and weight, as well as lower body water content and higher body fat content of women.

- Aside from the UK, there are only five other countries that recommend the same guidelines for men and women: Australia, Netherlands, Albania, Guyana and Grenada.

2.2 The UK now has one of the strictest guideline levels for male consumption of anywhere in the world and is nearly half that of comparable countries like the US or Canada - countries that have conducted recent reviews of alcohol guidelines, based on the same international evidence base.

- In developing the Guidelines the expert panel advising the Chief Medical Officer examined evidence from Canadian and Australian models to help develop their methodological approach. However, the resulting UK guidelines were much lower than guidelines in either Canada or Australia:

Canada (review: 2011) - advises that women do not exceed the UK equivalent of 17 units per week and men do not exceed UK equivalent of 25 units per week. o Australia (review: 2009) - advises that men and women do not exceed the UK equivalent of 17.5 units per week.

- In the same week that the Chief Medical Officer announced the new UK revised guidelines, the U.S. published their response to a similar review. In contrast to the U.K. experts, those involved in the U.S. process reached the conclusion that there is no reason, based on available evidence, to warrant a downward revision of previous recommendations, which are higher than those issued in the U.K. - 14 drinks per week for a man and 7 drinks per week for a woman (UK equivalent - 24 units per week for men and 12 units for a woman)
- For a full list, see: IARD, International drinking guidelines for general population.

3. Alcohol & Cancer

3.1 In formulating and communicating the new guidelines, the links between alcohol and cancer have been over-simplified and the full picture regarding alcohol and cancer has not been fully and fairly communicated.

- Increased cancer risk is most significantly associated with heavy drinking patterns. (See IARD Review, Drinking and Cancer: <http://www.iard.org/wp-content/uploads/2016/02/HR-Cancer.pdf>)

3.2 The international evidence base shows that the link between alcohol and cancer is not as straightforward as the new guidelines and surrounding communications from the CMO suggest. Alcohol has different impacts on a range of cancers including no impact on certain cancers. To accurately and fairly communicate risk to consumers, all cancers should be taken into account rather than only highlighting examples where alcohol does increase risk.

- There are a range of major cancers including ovarian and urinary bladder cancer, brain cancer, prostate cancer and lung cancer where the international evidence base shows no association to alcohol consumption.
- For certain cancers, alcohol consumption has been found to have some protective effect, including renal cancer and lymphatic cancers (such as non-Hodgkin's Lymphoma).

(Source: IARD Review, Drinking and Cancer, <http://www.iard.org/wp-content/uploads/2016/02/HR-Cancer.pdf>)

- **See Annex B: IARD, Brief Analysis of the evidence on drinking and health underlying the 2016 UK guidelines**

3.3 There is a link between alcohol and increased risk of breast cancer. However, the new UK guidelines, and the public language used by the Chief Medical Officer, fail to put into context the relative risks of alcohol consumption compared to other common factors that significantly increase the risk of breast cancer such as Hormone Replacement Therapy (HRT), shift work, and the contraceptive pill.

- The government provides guidance on HRT (a WHO listed class 1 carcinogen), shift work and the contraceptive pill, clearly explaining the links to breast cancer and putting risk into perspective. This is in stark contrast to the new 'no safe level' guidance given

Guidelines on HRT:

<http://www.nhs.uk/Conditions/Hormone-replacement-therapy/Pages/Disadvantages.aspx>

Guidelines on shift work:

<http://www.nhs.uk/news/2013/07July/Pages/Long-term-night-shifts-can-double-breast-cancer-risk.aspx>

Guidelines on the contraceptive pill:

<http://www.nhs.uk/Conditions/contraception-guide/Pages/combined-contraceptive-pill.aspx#Risks>

4. Health benefits and the protective effects of alcohol

4.1 There is overwhelming international evidence - and widespread scientific consensus - that total mortality among moderate drinkers is lower than among non-drinkers and that moderate consumption of alcohol can have protective effects against, for example, cardiovascular disease and cognitive decline.

- IARD Review, Drinking and Cardiovascular Health:
 - o "Cardiovascular disease (CVD) is the leading cause of death and disability in the world, killing over 17 million people each year. CVD is one of the main Non Communicable Diseases (NCDs), accounting for 37% of all NCD-related deaths worldwide, and represents a considerable health, social, and economic burden globally.
 - o The relationship between alcohol and CVD is complicated and depends on the pattern of drinking. While heavy consumption is a risk factor for CVD, light to moderate drinking has been identified as protective against several diseases among some groups of individuals.
 - o While the findings surrounding the cardioprotective effects of alcohol consumption have been challenged by some research, the biological mechanisms by which drinking affects CVD have been extensively studied and are well documented."

4.2 In the US, the most recent country to review alcohol guidelines, the government clearly acknowledges the significant number of lives saved due to moderate alcohol consumption:

- ***The US government's National Institute on Alcohol Abuse and Alcoholism state that:***
 "It is estimated that 26,000 deaths were averted in 2005 because of reductions in ischemic heart disease, ischemic stroke, and diabetes from the benefits attributed to moderate alcohol consumption."

4.3 International studies show alcohol can also have a protective effect against cognitive decline.

- Almeida et al (2014) - "Abstainers and irregular drinkers had higher odds of cognitive impairment than regular drinkers... Alcohol consumption, including heavy regular drinking and abuse, is not a direct cause of cognitive impairment in later life."
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with risk of cognitive impairment. Decreasing consumption by >0.5 drinks/week was associated with increased risk"

- Ruitenberg et al (2002) - "These findings suggest that light-to-moderate alcohol consumption is associated with a reduced risk of dementia in individuals aged 55 years or older. The effect seems to be unchanged by the source of alcohol." This is a key study as it is a cohort study of nearly 8,000 people and it finds a near halving of risk of dementia among drinkers. Also important is that this effect does not vary by drink type, whereas some of the literature finds effects isolated to red wine drinkers. Finally it discusses the etiology of the protective effect hypothesising that alcohol's effect on the vascular system which affects dementia risk.

5. 'No safe limit' of alcohol & communicating risk to consumers

5.1 One of the main changes to the guidance is that the Chief Medical Officer is now advising there is no 'safe' level of alcohol consumption, i.e. that there is no level of consumption at which the benefits of alcohol outweigh the harm. This statement is misleading, running contrary to the overwhelming international evidence base (see above).

- *Professor Sir David Spiegelhalter (President-elect) & Professor Peter Diggle (President) of the Royal Statistical Society have written to the Health Secretary Jeremy Hunt regarding the new alcohol guidelines, stating: "We are concerned that, in their recent communications about alcohol guidelines, the Department of Health did not properly reflect the statistical evidence provided to the Expert Guideline Group, and this could lead to both a loss of reputation and reduced public trust in future health guidance."*

Furthermore, the letter states:

"There was consistent downplaying and even denial of benefit, with the Press release saying that "the protective effect of alcohol against heart disease has now been shown not to apply to men", which directly contradicts the estimates published in the Expert Group Report.

The potential harms from cancer were repeatedly emphasised, even though the modellers concluded these were outweighed by the reduction in strokes and heart disease for low consumption in both men and women.

No mention was made of the harms of additional consumption, and that these were higher in women.

Further, the tone of the Department of Health website was very prescriptive, saying men 'should' drink less than 14 units."

That most activities that people undertake on a daily basis - e.g. driving to work - carry some risk, and people need to make informed choices about the level of risk that they are prepared to accept,"

5.3 National media, leading commentators, politicians and members of the public have been overwhelmingly critical of the new guidelines. This reflects the significant public feeling that the guidelines are out-of-touch.

6. Importance of labelling to the communication of the Guidelines

6.1 As part of the Responsibility Deal the industry voluntarily labelled 80% of products on shelves with the previous Chief Medical Officer's Guidelines. The process to date has failed to recognise the need for a reasonable transition to any change of messages. New guidelines were publicly announced without notice, creating uncertainty for businesses.

- An independent audit conducted by Campden BRI in 2014 found that the industry had delivered on its pledge and reported that 83% of products contained the previous Chief Medical Officers Guidelines, this is an increase from just 5.9% in 2008.
<https://responsibilitydeal.dh.gov.uk/wp-content/uploads/2014/11/Campden-BRI-Audit-of-PHRD-labelling-compliance-2014-FINAL-report-October2014-final.pdf>;
- However, Department of Health (DH) provided no prior warning of the significant change and did not consult industry on how the changes may impact them or prepare an economic impact assessment;
- Furthermore, the Department of Health provided no guidance on the validity of the previous guidelines, only stating that they were out of date overnight. Also, the DH failed to provide any assurance initially that products labelled with the daily guidance could continue to be sold, whilst communication of the guidelines is still subject to consultation.
- Given the strict law around labelling this created a significant amount of needless uncertainty as to the legality of products and, in the absence of new wording which is still under consultation, threatened to force producers to remove the guidance which would fracture the coalition that delivered the 80% pledge

6.2 Transition periods are vital for industry

- It is important to note that the voluntary commitment to labelling was made in March 2011 and took nearly two years to complete. It is expensive and takes time for labels to be designed, produced and placed on bottles and for those bottles to reach the market.
- Additionally, alcohol is a product that can remain in the supply chain and on shelf for a significant amount of time after they have been produced and labelled. This increases the risk of consumers being confused by multiple different sets of information.
- In the recent EU Reg 1169/2011 on food information to consumers, the transitional measures (art 54) allowed food placed on the market up to the day the regulation was published to be marketed until stocks of the food were exhausted. This legislation was

published in Dec 2011 but did not come into force until Dec 2014. The FSA stated that this was required as "The three year transition period allows businesses to make the necessary changes to their processes and labelling designs in order to meet the provisions laid out in the legislation." <https://www.food.gov.uk/science/allergy-intolerance/label>

Submitted to UK CMO Guidelines Review
Submitted on 2016-04-01 12:26:19

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Personal views

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I have a serious overall problem with these guidelines. They clearly reflect an absolutist/teetotal bias rather than any seriously considered review of the scientific health issues. They remind me of the 'Sunday closing' campaigns in the Wales of my youth! Then, I never met anyone who sincerely believed in Sunday public house closure alongside Monday to Saturday opening; rather 'at least let us close them down on Sunday as a step towards prohibition'. Here, the implied sentiment is 'we'd rather you didn't drink at all, but if you must...'.
I am a personal believer in moderation in all things, including alcohol consumption. We cannot simply condemn alcohol completely because some people might misuse it to their detriment.

The organisation CAMRA have supplied a considered critique, which I have seen, and endorse as to the benefits of moderate drinking. These biased guidelines are worse than unhelpful, being likely to provoke a dismissive attitude amongst 'real problem drinkers', who will then feel psychologically at liberty to ignore them completely; whilst moderate drinkers will not actually obtain any useful guidance because of their confused nature. Whether this is deliberate (to frighten folk) or simply incompetent science is a moot point.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I have a serious overall problem with these guidelines. They clearly reflect an absolutist/teetotal bias rather than any seriously considered review of the scientific health issues. They remind me of the 'Sunday closing' campaigns in the Wales of my youth! Then, I never met anyone who sincerely believed in Sunday public house closure alongside Monday to Saturday opening; rather 'at least let us close them down on Sunday as a step towards prohibition'. Here, the implied sentiment is 'we'd rather you didn't drink at all, but if you must...'.
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6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I have a serious overall problem with these guidelines. They clearly reflect an absolutist/teetotal bias rather than any seriously considered review of the scientific health issues. They remind me of the 'Sunday closing' campaigns in the Wales of my youth! Then, I never met anyone who sincerely believed in Sunday public house closure alongside Monday to Saturday opening; rather 'at least let us close them down on Sunday as a step towards prohibition'. Here, the implied

sentiment is 'we'd rather you didn't drink at all, but if you must...'.

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7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I have a serious overall problem with these guidelines. They clearly reflect an absolutist/ teetotal bias rather than any seriously considered review of the scientific health issues. They remind me of the 'Sunday closing' campaigns in the Wales of my youth! Then, I never met anyone who sincerely believed in Sunday public house closure alongside Monday to Saturday opening; rather 'at least let us close them down on Sunday as a step towards prohibition'. Here, the implied sentiment is 'we'd rather you didn't drink at all, but if you must...'.

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8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I have a serious overall problem with these guidelines. They clearly reflect an absolutist/ teetotal bias rather than any seriously considered review of the scientific health issues. They remind me of the 'Sunday closing' campaigns in the Wales of my youth! Then, I never met anyone who sincerely believed in Sunday public house closure alongside Monday to Saturday opening; rather 'at least let us close them down on Sunday as a step towards prohibition'. Here, the implied sentiment is 'we'd rather you didn't drink at all, but if you must...'.

I am a personal believer in moderation in all things, including alcohol consumption. We cannot simply condemn alcohol completely because some people might misuse it to their detriment.

The organisation CAMRA have supplied a considered critique, which I have seen, and endorse as to the benefits of moderate drinking.

These biased guidelines are worse than unhelpful, being likely to provoke a dismissive attitude amongst 'real problem drinkers', who will then feel psychologically at liberty to ignore them completely; whilst moderate drinkers will not actually obtain any useful guidance because of their confused nature. Whether this is deliberate (to frighten folk) or simply incompetent science is a moot point.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I have a serious overall problem with these guidelines. They clearly reflect an absolutist/ teetotal bias rather than any seriously considered review of the scientific health issues. They remind me of the 'Sunday closing' campaigns in the Wales of my youth! Then, I never met anyone who sincerely believed in Sunday public house closure alongside Monday to Saturday opening; rather 'at least let us close them down on Sunday as a step towards prohibition'. Here, the implied sentiment is 'we'd rather you didn't drink at all, but if you must...'.

I am a personal believer in moderation in all things, including alcohol consumption. We cannot simply condemn alcohol completely because some people might misuse it to their detriment.

The organisation CAMRA have supplied a considered critique, which I have seen, and endorse as to the benefits of moderate drinking.

These biased guidelines are worse than unhelpful, being likely to provoke a dismissive attitude amongst 'real problem drinkers', who will then feel psychologically at liberty to ignore them completely; whilst moderate drinkers will not actually obtain any useful guidance because of their confused nature. Whether this is deliberate (to frighten folk) or simply incompetent science is a moot point.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

I have a serious overall problem with these guidelines. They clearly reflect an absolutist/ teetotal bias rather than any seriously considered review of the scientific health issues. They remind me of the 'Sunday closing' campaigns in the Wales of my youth! Then, I never met anyone who sincerely believed in Sunday public

house closure alongside Monday to Saturday opening; rather 'at least let us close them down on Sunday as a step towards prohibition'. Here, the implied sentiment is 'we'd rather you didn't drink at all, but if you must...'.
I am a personal believer in moderation in all things, including alcohol consumption. We cannot simply condemn alcohol completely because some people might misuse it to their detriment.
The organisation CAMRA have supplied a considered critique, which I have seen, and endorse as to the benefits of moderate drinking.
These biased guidelines are worse than unhelpful, being likely to provoke a dismissive attitude amongst 'real problem drinkers', who will then feel psychologically at liberty to ignore them completely; whilst moderate drinkers will not actually obtain any useful guidance because of their confused nature. Whether this is deliberate (to frighten folk) or simply incompetent science is a moot point.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

No

If you answered 'No' above, please explain here how the advice could be made clearer (maximum 200 words):

I have a serious overall problem with these guidelines. They clearly reflect an absolutist/ teetotal bias rather than any seriously considered review of the scientific health issues. They remind me of the 'Sunday closing' campaigns in the Wales of my youth! Then, I never met anyone who sincerely believed in Sunday public house closure alongside Monday to Saturday opening; rather 'at least let us close them down on Sunday as a step towards prohibition'. Here, the implied sentiment is 'we'd rather you didn't drink at all, but if you must...'.
I am a personal believer in moderation in all things, including alcohol consumption. We cannot simply condemn alcohol completely because some people might misuse it to their detriment.
The organisation CAMRA have supplied a considered critique, which I have seen, and endorse as to the benefits of moderate drinking.
These biased guidelines are worse than unhelpful, being likely to provoke a dismissive attitude amongst 'real problem drinkers', who will then feel psychologically at liberty to ignore them completely; whilst moderate drinkers will not actually obtain any useful guidance because of their confused nature. Whether this is deliberate (to frighten folk) or simply incompetent science is a moot point.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

No

If you answered 'No' above, please explain here how the advice could be made clearer (maximum 200 words):

I have a serious overall problem with these guidelines. They clearly reflect an absolutist/ teetotal bias rather than any seriously considered review of the scientific health issues. They remind me of the 'Sunday closing' campaigns in the Wales of my youth! Then, I never met anyone who sincerely believed in Sunday public house closure alongside Monday to Saturday opening; rather 'at least let us close them down on Sunday as a step towards prohibition'. Here, the implied sentiment is 'we'd rather you didn't drink at all, but if you must...'.
I am a personal believer in moderation in all things, including alcohol consumption. We cannot simply condemn alcohol completely because some people might misuse it to their detriment.
The organisation CAMRA have supplied a considered critique, which I have seen, and endorse as to the benefits of moderate drinking.
These biased guidelines are worse than unhelpful, being likely to provoke a dismissive attitude amongst 'real problem drinkers', who will then feel psychologically at liberty to ignore them completely; whilst moderate drinkers will not actually obtain any useful guidance because of their confused nature. Whether this is deliberate (to frighten folk) or simply incompetent science is a moot point.

Submitted to UK CMO Guidelines Review
Submitted on 2016-04-01 16:10:30

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:
Halton Borough Council

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We support that the low risk drinking guidelines does not advise on a specific number for single occasion drinking. Our position is based on the following:
Best possible communication: We believe low risk drinking guidelines needs to be easy to communicate to make the public aware and understand the guidelines, and should therefore only be one number (14), with the additional information that this amount should be spread on several days. Introducing a number for drinking on a single occasion can confuse the messaging, and as a result disrupt the main message of 14 units per week.
Risk of higher consumption levels perceived as low risk drinking: If a single occasion low risk drinking guideline were introduced, we believe this would be the dominant guideline remembered by the consumers compared to the weekly guideline, and thus confuse consumers on what the limit for low risk drinking is. If for example a single occasion guideline is set to 7 units, we end up risking that consumers think they are within the low risk drinking patterns by never consuming more than 7 units per occasion. If this is repeated several times a week, consumers easily exceed the weekly limit of 14.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

spiritsEUROPE

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

It is well established that patterns of drinking are the most important predictor of chronic and acute harms. And monitoring one's drinking over a week is more complicated than monitoring one's consumption over a day. We therefore believe that daily guidelines are better fitted to accurately inform those who choose to drink.

Stating that any drinking increases the risk of developing diseases implies that alcohol consumption per se is unsafe. This categorical statement is not in line with available evidence, which associates low to moderate drinking with health benefits, compared to abstaining (evidence having controlled for "sick quitters"). The risk of premature death from all possible causes is reduced at a daily consumption levels up to around 20g per day for women and 40g for men. Both are well above the recommended UK levels. With a recommendation as low as 14 units per week, we believe the UK government should rename the CMO guidelines as "safe drinking guidelines" and not as "low-risk drinking guidelines".

The absence of difference between recommendations for men and women is also at odds with evidence, and other international drinking guidelines.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The new recommendation does not differentiate between risky and non-risky patterns, which are well established as the most important predictor of chronic and acute harms. Daily guidelines are therefore better fitted to reduce such harms.

Numerous robust scientific studies show that otherwise healthy adults who consume alcoholic beverages in moderation may face a lower risk for a number of conditions, in particular age-related risks such as coronary heart disease, ischemic stroke, diabetes and dementia.

Light to moderate drinking by healthy adults is compatible with a healthy lifestyle. It would more advisable to provide consumers with information on what are risky and non-risky drinking patterns, for them to make informed choices.

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The correct information to convey is that heavy episodic drinking can lead to accidents and injuries. But only frequent and regular heavy drinking over long periods of time lead to long-term illness. The proposed statement is therefore misleading.

In order to minimise acute harms resulting from heavy episodic drinking, maximum limits per drinking occasion can provide useful reference points.

The new formulation of the guidelines also fails to express the number of units or drinks not to be exceeded per drinking occasion. When recommending weekly thresholds and inviting for several days of abstinence, consumers may understand they can consume all 14 units in a few occasions only, which may lead to excessive drinking.

The old guidelines had the advantage to clearly state these limits, while the new ones seem to indicate the acceptability to drink a greater amount in a single sitting.

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Stating that any alcohol consumption increases the risk of developing a disease implies that drinking alcohol per se is unsafe. This statement is not in line with the available evidence. It is also difficult to understand why it was chosen to downplay the protective benefits of moderate alcohol consumption while over-emphasising the link with some cancers.

Moderate alcohol use has been reported to reduce the risk of circulatory system diseases, the main cause of death in the EU. Circulatory system deaths, including heart diseases, are far more common than cancer deaths and specific (clearly) alcohol-related diseases in general. Therefore, absolute and relative risks need to be considered.

The links between alcohol and cancer are complex and not linear as induced above. Lifestyle choices, environmental determinants and combinations of such (diet, smoking, ethnicity, reproductive history or use of contraceptives) play a more important role than drinking. It is reported that around 4% of all-cancer types are alcohol related and alcohol related cancer deaths were responsible for 1.2% of all-cause mortality in the EU.

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The recommendation on alcohol-free days is addressed to heavy drinkers, and does not apply to light to moderate drinkers which constitute the majority of UK consumers, according to the background CMO reports.

The overall and core message should be to promote moderation every day.

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

The advice on a single occasion of drinking and what one could do to reduce health risks is understandable in parts. This section is, however, long and convoluted, yet in many ways simply states the obvious.

Also, understanding of 'risky places and activities' will differ between individuals.

Maximum limits per drinking occasion can provide useful reference points for consumers to make informed choices.

Again, it is well established that patterns of drinking are the most important predictor of chronic and acute harms. But the evidence does not support a consistent relationship between regular, low to moderate drinking and either acute or chronic harms.

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Not Answered

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

No opinion

This illustrates why the guidelines should have been subject to an open consultation before any public announcement.

As explained above, drinking patterns are very important, not just the quantities consumed. For any further recommendation on the number of units not to exceed in one occasion/day, full consideration must be given to epidemiological evidence.

In order not to confuse messages, reverting back to daily recommendation, possibly framed within a weekly one, could be the solution. Yet, it is ultimately the understanding of the guidelines by consumers that matters. Behavioural research may help in this respect.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Unlike the other sections, this part of the guidelines is clear and supported by a fair analysis of the evidence.

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

University of Salford

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Suggestion that it could be clearer by defining 'several' in the last bullet point e.g. at least two drink-free days each week.

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Could be made clearer by defining a 'heavy drinking session' in unit amounts

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Suggestion to make clearer by defining several e.g. at least two drink-free days each week

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

As well as adding to the principles of SMART goal setting, setting a numerical unit value for single occasions should also be integrated into alcohol screening tools used in IBA which often include a 'binge' / heavy episodic screening question (e.g. SASQ, AUDIT & AUDIT-C item 3). Screening tool templates (e.g. on the Alcohol Learning Centre) could then also be updated to reflect the CMO guidance using the numerical value decided following further consideration of the health evidence.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

3 What is your organisation?

Organisation:

Healthier Futures

The weekly guideline as a whole

4 Is the weekly guideline for regular drinking as a whole, along with the explanation in the 'Summary of the proposed guidelines', clear and understandable?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Individual parts of the weekly guideline

5 Is it clear what the guideline – along with the explanation – means, for how you can seek to reduce long term risks to your health from alcohol? Is the explanation for how the weekly guideline was chosen clear?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

6 Is it clear what the guideline – along with the explanation – means, for how you can keep your health risks within a low level, if you drink on only a few days each week?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

7 Is it clear what the guideline – along with the explanation – means? Is it clear how you could, if you wish, reduce your long term health risks below the low risk level set by the guideline?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

8 Is it clear what the guideline – along with the explanation – means and how you could use this if you wished to reduce your drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

Single occasions of drinking

9 Is the advice – along with the explanation – on single occasions of drinking clear? Do you understand what you could do to limit health risks from any single occasion of drinking?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

10 For the advice on single occasions of drinking, the expert group considered, but did not finally recommend, suggesting a specific number of units that you shouldn't drink more than on any occasion or day, for example, 7 units. They did not recommend this, for the reasons described in the box. However, there is evidence that it can be easier to follow advice with a simple number than to follow more general advice. If the health evidence justifies it, would you prefer advice on single occasions to be expressed in units?

No

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

We support that the low risk drinking guidelines does not advise on a specific number for single occasion drinking. Our position is based on the following:

Best possible communication: We believe low risk drinking guidelines needs to be easy to communicate to make the public aware and understand the guidelines, and should therefore only be one number (14), with the additional information that this amount should be spread on several days. Introducing a number for drinking on a single occasion can confuse the messaging, and as a result disrupt the main message of 14 units per week.

Risk of higher consumption levels perceived as low risk drinking: If a single occasion low risk drinking guideline were introduced, we believe this would be the dominant guideline remembered by the consumers compared to the weekly guideline, and thus confuse consumers on what the limit for low risk drinking is. If for example a single occasion guideline is set to 7 units, we end up risking that consumers think they are within the low risk drinking patterns by never consuming more than 7 units per occasion. If this is repeated several times a week, consumers easily exceed the weekly limit of 14.

Guideline on pregnancy and drinking

11 Is the guideline on pregnancy and drinking clear? Do you understand what a pregnant women should do to keep risks to her baby to a minimum?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]:

12 In recommending this guideline, the expert group aimed for 1) a precautionary approach to minimising avoidable risks to babies2) openness about uncertainties in the evidence, particularly on the effects of low levels of drinking in pregnancy3) reasonable reassurance for women who may discover they have drunk alcohol before knowing they were pregnant Has the guideline met these aims?

Yes

If you answered 'No' above, please explain here how the advice could be made clearer [maximum 200 words]: