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February 12, 1999

Dr. Larry G. Hart  
Board Executive Secretary  
National Toxicology Program  
Research Triangle Park, NC 27709

Dear Dr. Hart:

I am submitting comments regarding the recommendation to list alcoholic beverages (wine, beer, and spirits) in the National Toxicology Program's (NTP) *Ninth Edition of the Report on Carcinogens* (RoC). The American Wine Alliance for Research and Education (AWARE) is a non-profit 501(c)(3) organization governed by health professionals and is located in Washington, D.C.

The primary mission of AWARE is physician and other allied health professional education about alcohol and health issues, and we welcome all efforts to disseminate accurate and balanced information about the health effects of alcohol consumption. Recent epidemiological studies have demonstrated the potential for significant health benefits associated with moderate, responsible alcohol consumption. It is critical, therefore, that physicians and health professionals have the most current and accurate information in order to adequately counsel patients on the risks and benefits of consuming alcohol within the context of their given health status.

In reviewing the transcript of the December 2, 1998 meeting of the Board Subcommittee, it appears that the Board has not conducted a truly comprehensive review of the literature and available medical-scientific data on the relationship between alcohol and cancer. As you know, cancer and its etiology are extremely elusive due to the multitude of possible confounding factors, including smoking, lifestyle, alcohol consumption levels, and nutrition. From the transcript it is clear that there was insufficient discussion and consensus within the panel concerning the impact of these factors on cancer risk.

An additional consideration that was not adequately acknowledged is the dose-response aspect of the toxicity of alcohol. Clearly, all the data indicate that cancer risk is associated with very high levels of alcohol consumption over extended periods of time. This is an absolutely critical factor that must be included in any discussion of this issue. Furthermore, a substantial amount of new clinical data has demonstrated that some alcohol beverages may actually exert a protective against some types of cancer. Therefore, to make a simple

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A Balanced View

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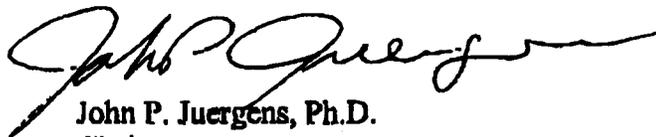
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February 12, 1999  
Page 2

blanket statement that alcohol is a known human carcinogen would ignore a large body of relevant scientific data and thousands of years of experience. Simply listing alcoholic beverages as carcinogenic without substantial qualification would be a direct disservice to the public, and, more importantly, would induce serious confusion about this issue among health professionals and treating physicians.

Given the highly complex and still unclear nature of the relationship between alcohol consumption and the risk of cancer, I would strongly urge the National Toxicology Program to defer a recommendation to list alcoholic beverages as known human carcinogens until a more thorough and independent examination can be made of all the scientific data available. Alcohol has been consumed safely in moderate quantities for centuries in every culture. To rush to a decision based on incomplete and inconclusive evidence would be ill-advised and could itself be seen as a threat to public health.

Sincerely,



John P. Juergens, Ph.D.  
Chairman