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## Comparative risk assessment of carcinogens in alcoholic beverages using the margin of exposure approach

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# 1 **Comparative risk assessment of carcinogens in alcoholic beverages using the** 2 **margin of exposure approach**

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12  
13 Short title: Comparative risk assessment of carcinogens in alcoholic beverages

14 Key words: Alcoholic beverages, risk assessment, dose-response relationship, margin of exposure,  
15 epidemiology

16 Article category: Research Article; Epidemiology

## 17 18 **Brief statement about novelty and impact:**

19 This study is the first to apply a quantitative approach for comparative risk assessment of different  
20 carcinogens in alcoholic beverages. Ethanol was found to be the most important ingredient leading to  
21 substantial cancer risk. This result clarifies misinformation that other contaminants are predominantly  
22 responsible for the carcinogenicity, e.g., claims by industry about carcinogenic contaminants, which are  
23 not contained in certain brand products. Until now, the scientific basis was lacking to refute such  
24 misleading advertisement claims. The developed methodology can also be transferred to other ingredients  
25 or to comparative risk assessment of other substances.

**Abstract**

Alcoholic beverages have been classified as carcinogenic to humans. As alcoholic beverages are multi-component mixtures containing several carcinogenic compounds, a quantitative approach is necessary to compare the risks.

Fifteen carcinogenic compounds (acetaldehyde, acrylamide, aflatoxins, arsenic, benzene, cadmium, ethanol, ethyl carbamate, formaldehyde, furan, lead, 4-methylimidazole, *N*-nitrosodimethylamine, ochratoxin A, and safrole) occurring in alcoholic beverages were identified based on monograph reviews by the International Agency for Research on Cancer. The margin of exposure (MOE) approach was used for comparative risk assessment. MOEs were calculated for different drinking scenarios (low risk and heavy drinking) and different levels of contamination for four beverage groups (beer, wine, spirits, unrecorded alcohol).

The lowest MOEs were found for ethanol (3.1 for low risk and 0.8 for heavy drinking). Lead and arsenic have average MOEs between 10 and 300, followed by acetaldehyde, cadmium and ethyl carbamate between 1,000 and 10,000. All other compounds had average MOEs above 10,000 independent of beverage type.

Ethanol was identified as the important carcinogen in alcoholic beverages, with a clear dose-response curve. Some other compounds (lead, arsenic, ethyl carbamate, acetaldehyde) may pose risks below thresholds normally tolerated for food contaminants, but from a cost-effectiveness point of view, the focus should be on reducing alcohol consumption in general than on mitigative measures for some contaminants that contribute only in minor fashion (if at all) to the total health risk.

## 47 **Introduction**

48 Since the first observation in France in the beginning of the last century that the consumption of  
49 absinthe was related to oesophageal cancer,<sup>1</sup> epidemiology has established a causal relationship  
50 between alcohol consumption in general (i.e. independent of beverage type) and the occurrence  
51 of cancer. Moreover, in 1988, the International Agency for Research on Cancer (IARC) classified  
52 alcoholic beverages into group 1 as "carcinogenic to humans".<sup>2</sup> At this time, a causal relationship  
53 between alcohol consumption and the occurrence of malignant tumours of the oral cavity,  
54 pharynx, larynx, oesophagus and liver was established. In the following IARC evaluations, colo-  
55 rectum cancer and female breast cancer were added to the list of cancer sites with causal  
56 relationship, while only limited evidence points to stomach and pancreas as further sites.<sup>3-5</sup>  
57 While the epidemiological evidence on the carcinogenicity of alcoholic beverages had been  
58 sufficiently established for several decades, the principal mechanism underlying this relationship  
59 has been a matter of debate. For a long time it was assumed that ethanol itself was not a direct  
60 carcinogen. The 1988 IARC monograph, for example, stated that there is inadequate evidence for  
61 the carcinogenicity of ethanol in experimental animals.<sup>2</sup> However, this statement was based on  
62 lack of well-controlled and designed experimental studies rather than on a clear absence of effect.  
63 Since then, two adequately designed long-term animal studies have clearly demonstrated that  
64 ethanol causes dose-related cancer in mice and rats at sites similar to those observed in humans  
65 (liver and oral cavity).<sup>6,7</sup> As a result of this new evidence, the 2007 IARC evaluation concluded  
66 that there is sufficient evidence in experimental animals for the carcinogenicity of ethanol.<sup>3,5</sup>  
67 Furthermore, substantial mechanistic evidence has become available in humans who are deficient  
68 in aldehyde dehydrogenase that acetaldehyde derived from the metabolism of ethanol in alcoholic  
69 beverages contributes to the causation of malignant oesophageal tumours. Acetaldehyde reacts

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3 70 with DNA to form various DNA adducts, and elevated levels of acetaldehyde-derived DNA  
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5 71 adducts have been detected in white blood cells of individuals who are heavy alcoholic beverage  
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8 72 drinkers. Some of the DNA adducts that are increased after alcoholic beverage consumption are  
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10 73 mutagenic in human cells. In addition, these adducts can undergo rearrangements in double-  
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12 74 stranded DNA, which can result in the formation of DNA–protein cross-links and DNA  
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14 75 interstrand cross-links, which are mechanistically consistent with the generation of chromosomal  
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16 76 aberrations. Elevated levels of chromosomal aberrations have been observed in human cells in  
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18 77 culture after exposure to acetaldehyde as well as *in vivo* in human alcoholics.<sup>3</sup> This mechanistic  
19  
20 78 evidence combined with the results in experimental animals and the epidemiological observation  
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22 79 that all alcoholic beverages cause cancer demonstrate that ethanol is an important carcinogenic  
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24 80 compound in alcoholic beverages. In their most recent evaluation, IARC has therefore classified  
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26 81 both "ethanol in alcoholic beverages" as well as "acetaldehyde associated with alcohol  
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28 82 consumption" into group 1 as "human carcinogens".<sup>4</sup>  
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31 83 Nevertheless, misinformation is still spread that ethanol is not a carcinogen at all or that alcohol-  
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33 84 related cancer is exclusively caused by something else. For example, promotional material on an  
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35 85 ethanol-containing mouthwash states that "ethanol is not a carcinogen; however, alcoholic  
36  
37 86 beverages contain numerous carcinogenic compounds such as urethane, nitrosamines, polycyclic  
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39 87 hydrocarbons and aflatoxins".<sup>8</sup> While there is certainly ample evidence pointing to the fact that  
40  
41 88 ethanol is the major carcinogenic compound in alcoholic beverages, the assumption about other  
42  
43 89 carcinogens cannot be directly negated. Alcoholic beverages are multi compound mixtures and  
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45 90 (similar to tobacco) may regularly contain various carcinogens such as those mentioned in the  
46  
47 91 promotional material. The IARC also remarked that identification of ethanol as a known  
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49 92 carcinogenic agent in alcoholic beverages does not rule out the possibility that other components  
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51 93 may also contribute to their carcinogenicity.<sup>3</sup> A summary of carcinogens typically occurring in  
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3 94 alcoholic beverages is provided in table 1. In fact some of these carcinogens in alcoholic  
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5 95 beverages, and specifically ethyl carbamate (urethane), are seen by international bodies such as  
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8 96 the Joint FAO/WHO Expert Committee on Food Additives (JECFA) or the European Food  
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10 97 Safety Authority (EFSA) as public health risk independent of ethanol.<sup>9,10</sup> For this reason, the  
11  
12 98 European Commission has advised the member states to monitor the ethyl carbamate  
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14 99 contamination in certain alcoholic beverages.<sup>11</sup> Another example is *N*-nitrosodimethylamine  
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16 100 (NDMA), which was first found in German beers in 1978,<sup>12</sup> when concentrations of up to  
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18 101 68 µg/L caused worldwide concern. A change in the target organ specificity of NDMA by co-  
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20 102 administration of ethanol was observed: when NDMA was given in combination with ethanol,  
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22 103 rats and mice developed tumours in the nasal cavity, which is not a target site for this  
23  
24 104 nitrosamine. This suggests that ethanol may influence the initiation of carcinogenesis in some  
25  
26 105 manner, but it is also possible that the process is enhanced due to some mechanistic events: the  
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28 106 facilitation of entry into the target cell by ethanol, a change in intracellular metabolism or  
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30 107 suppression of DNA repair. The hypothesis of competitive inhibition of hepatic metabolism of  
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32 108 the carcinogen, which allows it to reach the target organs, has also been proposed.<sup>3</sup> The questions  
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34 109 about the risk posed by other substances other than ethanol is especially important for unrecorded  
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36 110 (i.e. illicitly or home-produced) alcohol, which is assumed to potentially contain higher  
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38 111 concentrations of contaminants, especially ethyl carbamate and acetaldehyde.<sup>13,14</sup>  
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41 112 The literature currently offers no quantitative information if and how much other carcinogenic  
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43 113 constituents or contaminants of alcoholic beverages compare with and contribute to the risk  
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45 114 generated by ethanol. Such information is necessary especially to inform risk management to  
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47 115 prioritize cancer prevention.  
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50 116 Several approaches were suggested in the past for quantitative risk assessment of carcinogens.<sup>15</sup>  
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53 117 From these, the so-called margin of exposure (MOE) approach is currently preferred by  
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3 118 international bodies such as WHO<sup>16</sup> or EFSA<sup>17</sup>, for recent review see Benford et al.<sup>18</sup>. This study  
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5 119 will therefore apply the MOE approach to provide a comparative risk assessment of carcinogens  
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8 120 occurring in alcoholic beverages. The results will be used to point out options for alcohol policy.  
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## 11 121 **Methods**

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14 122 The selection of carcinogens and their occurrence in alcoholic beverages was based on the most  
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17 123 recent detailed IARC review,<sup>3</sup> for exceptions see remarks in results section. The assessment of  
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20 124 toxicological endpoints and benchmark doses (BMD) for the selected carcinogens was generally  
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22 125 based on literature data, as own dose-response modelling would have gone beyond the scope of  
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24 126 this study. Suitable risk assessment studies including endpoints and dose-response modelling  
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27 127 results were typically identified in monographs of national and international risk assessments  
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29 128 bodies such as WHO International Programme on Chemical Safety (IPCS), JECFA, US  
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31 129 Environmental Protection Agency (EPA) and EFSA. For substances without available  
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34 130 monographs or with missing data on dose-response modelling results, the scientific literature in  
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36 131 general was searched for such data. Searches were carried out in September 2011 in the following  
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39 132 databases: PubMed (U.S. National Library of Medicine, Bethesda, MD), Web of Science  
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41 133 (Thomson Reuters, Philadelphia, PA), Scopus (Elsevier B.V., Amsterdam, the Netherlands), and  
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43 134 Google Scholar (Google Inc., Mountain View, CA).

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45 135 The BMD/MOE approach was used for risk assessment.<sup>17,19,20</sup> Based on dose-response  
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48 136 modelling, the BMD is the point on the dose response curve, which characterizes adverse effects.  
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51 137 This value can then be used in combination with exposure data to calculate a MOE for  
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53 138 quantitative risk assessment. The MOE is defined as the ratio between the lower one-sided  
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55 139 confidence limit of the BMD (BMDL) and estimated human intake of the same compound. It can  
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57 140 be used to compare the health risk of different compounds and in turn prioritize risk management  
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3 141 actions. By definition, the lower the MOE, the larger the risk for humans; generally a value under  
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5 142 10,000 used to define public health risks.<sup>21</sup>  
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8 143 If BMDL values were unavailable in the literature, no observed effect level (NOEL) or no  
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10 144 observed adverse effect level (NOAEL) values were identified as surrogate thresholds instead.  
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12 145 The MOEs were then calculated by dividing the NO(A)EL by the estimated human intake.  
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15 146 For each beverage group (i.e. beer, wine, spirits and unrecorded alcohol), the human intakes were  
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17 147 calculated for two different drinking scenarios (low risk drinking and heavy drinking) based on  
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19 148 the drinking guidelines for Canada, which consider that 13.6 g pure alcohol constitute a standard  
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21 149 drink.<sup>22</sup> For both drinking scenarios, MOEs for average contamination as well as maximum  
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23 150 contamination with the different carcinogens were additionally calculated to estimate a range for  
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25 151 average and worst case contamination scenarios.  
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## 30 152 **Results**

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34 153 Alcoholic beverages may contain more than 1,000 different components,<sup>2</sup> from which several are  
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36 154 potentially carcinogenic. In the first step of the comparative risk assessment, a selection of  
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38 155 compounds for further evaluation has to occur. The IARC Monographs Working Group Vol. 96<sup>3</sup>  
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40 156 compared the complete IARC list of carcinogens with the list of compounds regularly occurring  
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42 157 in alcoholic beverages (appendix 1 in the IARC 1988 monograph<sup>2</sup>) and provided a summary of  
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44 158 carcinogens that may be present in alcoholic beverages (see table 1.14, p. 113 in the IARC 2010  
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46 159 monograph<sup>3</sup>). From this summary, we have chosen the compounds set into IARC group 1  
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48 160 (carcinogenic to humans), IARC group 2A (probably carcinogenic to humans) and IARC group  
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50 161 2B (possibly carcinogenic to humans) to be included in our evaluation. Compounds set into  
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52 162 IARC group 3 (not classifiable as to its carcinogenicity to humans) such as deoxynivalenol,  
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3 163 nivalenol, organolead compounds and patulin were excluded from our evaluation. The remaining  
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5 164 compounds in groups 1, 2A and 2B were acetaldehyde, acrylamide, aflatoxins, arsenic, benzene,  
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8 165 cadmium, ethanol, ethyl carbamate, furan, lead, NDMA, and ochratoxin A (Table 1). Since the  
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10 166 writing of the exposure section in the IARC Monograph Vol. 96 in 2007 (two of the authors of  
11  
12 167 this article, DWL and JR, were members of this working group and contributed to the initial  
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15 168 evaluation), additional evidence for some compounds has become available. For example, the  
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17 169 regular occurrence of formaldehyde, an IARC group 1 carcinogen, in alcoholic beverages was  
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19 170 detected.<sup>23</sup> Furthermore, 4-methylimidazole a contaminant of caramel colours with known use in  
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21 171 certain alcoholic beverages,<sup>24,25</sup> was newly evaluated by IARC in 2011 and set into group 2B.<sup>26</sup>  
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23 172 Safrole, another group 2B substance, may also potentially occur in alcoholic beverages.<sup>27</sup> Safrole  
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25 173 is a flavour compound with a comparably high ranking in the Berkeley carcinogenic potency  
26  
27 174 project due to its occurrence in spices.<sup>28</sup> Therefore, formaldehyde, 4-methylimidazole and safrole  
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29 175 were added to our list (Table 1).  
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33  
34 176 The data on occurrence of the chosen compounds in alcoholic beverages are summarized in Table  
35  
36 177 2. Data on recorded alcohol (i.e. commercial wine, beer and spirits) were predominantly based on  
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38 178 the summaries in the IARC 2010 monograph<sup>3</sup>. In some instance, actualized data from  
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40 179 international surveys (e.g. from EFSA) were available (see details in Table 2<sup>29-33</sup>). Less data on  
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42 180 unrecorded alcohol is generally available.<sup>13,34</sup> The data were therefore taken from an own survey  
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44 181 recently conducted in the European Union.<sup>14</sup>  
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48 182 In general, the contamination of alcoholic beverages with the selected compounds is subject to a  
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50 183 wide variation depending on product category, raw material, or diligence during manufacturing.  
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52 184 The substances typically occur at ppb-levels or below, e.g. for aflatoxins, cadmium, or ochratoxin  
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55 185 A. The exception are ethyl carbamate and formaldehyde, which may reach ppm-levels but only in  
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57 186 certain products, while acetaldehyde typically occurs in ppm-levels in all product categories  
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3 187 (besides vodka and neutral alcohol-based products), and may even exceed 1 g/L in certain highly  
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5 188 contaminated products. No clear difference between commercial and unrecorded alcoholic  
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8 189 beverages was detected with the exception of lead that may exceed 1 mg/L in highly  
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10 190 contaminated unrecorded alcohol.

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12 191 The toxicological endpoints used for dose-response modelling and the chosen points of departure  
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14 192 for MOE assessment are shown in Table 3.<sup>6,10,21,35-62</sup> According to international guidelines for  
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17 193 risk assessment using the MOE approach,<sup>16-18,20</sup> the most sensitive toxicological endpoint was  
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20 194 chosen, when several endpoints were available. For some agents such as formaldehyde, benzene  
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22 195 or lead, non-cancer endpoints were more sensitive than cancer endpoints or cancer endpoints  
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24 196 were unavailable. To provide a conservative assessment, we decided to use these non-cancer  
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27 197 endpoints in these cases. For a third of the compounds, human epidemiological data were  
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29 198 available suitable for dose-response modelling. For the rest of the compounds, the assessments  
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31 199 have to be based on animal data. The effective doses of the compounds as expressed by BMDL  
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34 200 vary over a very wide range, from 0.00087 mg/kg bw/day for aflatoxin B<sub>1</sub> to 700 mg/kg bw/day  
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36 201 for ethanol.

37  
38 202 Table 4 shows the corresponding MOEs for several scenarios and alcoholic beverage groups. An  
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40 203 average over all groups is provided in Figure 1. The lowest MOEs were calculated for ethanol,  
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42 204 with 3.1 for low risk drinking and 0.8 for heavy drinking. Lead and arsenic have average MOEs  
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44 205 between 10 and 300, followed by acetaldehyde, cadmium and ethyl carbamate between 1,000 and  
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47 206 10,000. Safrole, ochratoxin A, NDMA, 4-methylimidazole, furan, formaldehyde, aflatoxin B<sub>1</sub>  
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49 207 and acrylamide have average MOEs above 10,000, even in the heavy drinking scenario.  
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## 208 Discussion

209 Our study provides the first comprehensive comparison of the risk related to compounds in  
210 alcoholic beverages. It is interesting to note that from all evaluated agents, ethanol exhibits the  
211 lowest potency in terms of BMDL in mg/kg bw/day required to produce an effect. Nevertheless,  
212 due to its very high exposure as a major constituent of alcoholic beverages, this situation is  
213 completely reversed in terms of MOE, where now ethanol has the highest potency, as all other  
214 substances occur at considerably lower concentrations in order to produce the same effect. The  
215 observation that the MOE of ethanol is already in an effective dose range for the low risk  
216 drinking guideline for females is absolutely in line with epidemiological observations. For breast  
217 cancer, as an example, the largest pooled study on breast cancer shows significant effects for  
218 lower than one drink daily.<sup>63</sup>

219 Interestingly, a similar comparative risk assessment that was recently conducted for tobacco  
220 carcinogens<sup>64</sup> did not detect a single compound responsible for the carcinogenic effect as it was  
221 in our case for ethanol in alcoholic beverages. In tobacco, acrolein, formaldehyde, and cadmium  
222 all had MOEs down to below 10 and several other compounds had MOEs below 1000.<sup>64</sup>

223 Our result for ethanol (MOE of 3.1 for one drink per day) is in excellent agreement with the  
224 result from the Berkeley Carcinogenic Potency Database (CPDB) project,<sup>28</sup> which reported a  
225 MOE of 3 for moderate daily drinking (based on ethanol exposure of 326 mg/kg/day). It is of  
226 note that the CPDB project uses different methodology to calculate MOE (based on adjusted  
227 TD<sub>50</sub> values from older animal experiments<sup>65</sup> and not BMDL<sub>10</sub> from the most recent NTP study  
228 as in our case<sup>21</sup>). As the results are almost the same, this independently validates our approach.

229 The CPDB project also reported data on NDMA in beer before 1979 (MOE of 1,000) and NDMA  
230 in beer 1994-1995 (MOE of 50,000), which is also in agreement with our MOE results and the

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3 231 general observation that NDMA in beer is nowadays of negligible risk due to changes in  
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5 232 production technology.<sup>66</sup>  
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8 233 A limitation of our study is the fact that the MOE estimations for several of the other compounds  
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10 234 are not as robust as those for ethanol. For ethanol, not only the BMDL<sub>10</sub> from animal experiments  
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12 235 is available but also human BMD modelling data for several endpoints including liver cirrhosis<sup>21</sup>  
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15 236 as well as liver markers and blood pressure,<sup>67,68</sup> all of which are in the same order of magnitude  
16  
17 237 confirming the validity and inter-species transferability of the animal data. As no BMDL for  
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19 238 cancer effect of ethanol was available in the literature, we used the animal BMDL for this study.  
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22 239 For several of the other compounds, no epidemiological data was available or it was inconclusive  
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24 240 (signified by classification into IARC groups 2A and 2B). Two major problems of such  
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26 241 assessments remain: extrapolating between species as well as extrapolating from high-doses in  
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28 242 animals to low-doses in humans.<sup>69</sup> Our approach would therefore rather overestimate the risks of  
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30 243 these agents compared to ethanol, for which these problems do not arise. A second limitation of  
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32 244 the study would also lead to overestimation of the risks of all compounds besides ethanol: the  
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34 245 limited database on occurrence data of these compounds in alcoholic beverages. For most of the  
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36 246 compounds large international surveys are missing, which would be necessary to provide more  
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38 247 robust exposure estimations. The exception of this is ethyl carbamate, for which large  
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40 248 international and EU-wide surveys have been conducted.<sup>9,10</sup> Such data are especially lacking for  
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42 249 aflatoxins, cadmium, lead, and ochratoxin A. Several compounds also occur in only one category  
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44 250 of beverages (e.g., acrylamide and furan are only expected in beer, while 4-methylimidazole may  
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46 251 only occur in caramel-coloured products). In these cases, the absence of data can be explained by  
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48 252 the unlikelihood of occurrence, which explains that some groups of beverages were not studied at  
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50 253 all in the context of risk-oriented monitoring programs (see, e.g. Roth et al.<sup>70</sup>). We also assume  
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52 254 that there is a publication bias favouring positive results.<sup>71</sup> From own experience in our research  
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3 255 projects about unrecorded alcohol we know that it is much more problematic to publish survey  
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5 256 results indicating no public health relevance rather than alarmist reports of methanol deaths, for  
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7 257 example. From the typical lack of studies reporting absence of contamination in alcoholic  
8  
9 258 beverages, along with own experience as alcohol control authority (that routinely tests for  
10  
11 259 chemical contamination), we think that the occurrence data reported in table 2 are most likely  
12  
13 260 biased towards higher levels. This observation even strengthens our argumentation that ethanol is  
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15 261 the real risk factor in alcoholic beverages, as even with the available (most likely biased)  
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17 262 occurrence data, the MOEs of all other compounds are considerably higher than the MOE of  
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19 263 ethanol.  
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## 25 264 **Conclusion**

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29 265 There are two main conclusions. First, the MOE approach is excellently suitable to provide  
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31 266 comparative risk assessments for lifestyle factors that are mixtures of several toxic compounds  
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33 267 such as alcoholic beverages. Second, ethanol was confirmed as by far the most important  
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35 268 carcinogen in alcoholic beverages. This confirms deductions by other approaches (such as genetic  
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37 269 epidemiology and mechanistic considerations, see introduction). This observation ultimately  
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39 270 leads to the question if mitigation measures for the other carcinogens (e.g. as currently conducted  
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41 271 for ethyl carbamate) are an adequate policy or if the money should not rather be spent on  
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43 272 reducing alcohol consumption per se, for which several cost-effective measures are already  
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45 273 available.<sup>72</sup> The focus on alcohol policy would also not only reduce alcohol-related cancer but  
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47 274 alcohol-related harm in general. The German Federal Institute for Risk Assessment, for example,  
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49 275 holds the view in their assessment of acetaldehyde as contaminant of alcoholic beverages that  
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51 276 mitigation measures are not required in this case, as alcoholic beverages are health damaging  
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53 277 anyway.<sup>73</sup> On the one hand, we agree of course with this statement as alcoholic beverages per se  
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3 278 certainly pose inherent health risks. However, it also disregards the obligation of the regulating  
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5 279 agency to provide the safest possible environment. In modern societies we accept the fact that  
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8 280 citizens take risks, including risks, which are potentially lethal (e.g., by drinking alcohol or  
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10 281 exercising risky sports). However, within this risk taking the regulating agencies have to make  
11  
12 282 sure that the environment in which individual risk taking occurs is the safest possible (see  
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14 283 Refs.<sup>74,75</sup> for further elaboration of these arguments). We would not argue to tolerate not closing a  
15  
16 284 ski slope with present danger of avalanche based on the reasoning that skiing is dangerous  
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18 285 anyway. In other words, reducing directly contained acetaldehyde in alcoholic beverages, which  
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20 286 is technically possible,<sup>35,76</sup> should be targeted by regulating agencies, as it would reduce risk of  
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22 287 cancer independent of any individual risk decision. Our society cannot on the one hand tolerate  
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24 288 the use of alcoholic beverages and regulate them within food laws (as is the case in the European  
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26 289 Union) but then allow an exception regarding quality and safety. The individual drinker would  
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28 290 also most certainly select uncontaminated alcohol over contaminated alcohol.  
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32 291 In this context, it is noteworthy that for many of the mentioned contaminants, no maximum limits  
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34 292 are set by legislation that would allow adequate control and enforcement of quality standards.<sup>34</sup>  
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36 293 At least for one of the compounds, ethyl carbamate, mitigative risk management approaches are  
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38 294 ongoing but only on a "recommendation" basis.<sup>11</sup> Inorganic compounds such as lead or arsenic  
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40 295 could be relevant for future research as was previously suggested in an analysis focused on  
41  
42 296 wine.<sup>77</sup> However, the problem of lead is not restricted to alcoholic beverages, which contribute  
43  
44 297 only about 7% to the total lead exposure from foods and beverages.<sup>51</sup> As the MOEs for total lead  
45  
46 298 exposure may reach down to 1,<sup>51</sup> risk management strategies outside of alcohol policy appear to  
47  
48 299 be necessary for this metal.  
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50  
51 300 A final conclusion is the interesting observation that there is basically no substantial difference in  
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53 301 risk between unrecorded and recorded alcohol as it was sometimes differently purported by the  
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3 302 alcohol industry.<sup>78</sup> We also see no scientific basis for advertising claims that certain alcoholic  
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5 303 beverages are more or less carcinogenic than others (e.g. red wine less than spirits).  
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8 304  
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556 Table 1. Summary of WHO International Agency for Research on Cancer (IARC) evaluation of  
 557 carcinogenicity of substances that may be present in alcoholic beverages (updated from  
 558 IARC<sup>3</sup>)

Agent	IARC Monographs evaluation of Carcinogenicity			IARC Monographs (Volume Number)
	In animals	In humans	IARC group <sup>a</sup>	
Acetaldehyde associated with consumption of alcoholic beverages	Sufficient	Sufficient	1	<b>36, Sup 7, 71, 100E</b>
Acrylamide	Sufficient	Inadequate	2A	<b>60</b>
Aflatoxins	Sufficient	Sufficient	1	<b>56, 82, 100F</b>
Arsenic	Sufficient	Sufficient	1	<b>23, Sup 7, 100C</b>
Benzene	Sufficient	Sufficient	1	<b>29, Sup 7, 100F</b>
Cadmium	Sufficient	Sufficient	1	<b>58, 100C</b>
Ethanol in alcoholic beverages	Sufficient	Sufficient	1	<b>44, 96, 100E</b>
Ethyl carbamate (urethane)	Sufficient	Inadequate	2A	<b>7, Sup 7, 96</b>
Formaldehyde	Sufficient	Sufficient	1	<b>88, 100F</b>
Furan	Sufficient	Inadequate	2B	<b>63</b>
Lead compounds, inorganic	Sufficient	Limited	2A	<b>87</b>
4-Methylimidazole	Sufficient	Inadequate	2B	<b>101</b>
N-Nitrosodimethylamine	Sufficient	Inadequate	2A	<b>17, Sup 7</b>
Ochratoxin A	Sufficient	Inadequate	2B	<b>56</b>
Safrole	Sufficient	Inadequate	2B	<b>10, Sup 7</b>

559 <sup>a</sup> Group 1: Carcinogenic to humans; Group 2A: Probably carcinogenic to humans; Group 2B:  
 560 Possibly carcinogenic to humans (for definitions of groups, see monographs.iarc.fr).

561 Table 2. Occurrence of WHO International Agency for Research on Cancer (IARC) carcinogens  
562 in alcoholic beverages

Agent	Amount in alcoholic beverages (Average/Maximum) <sup>a</sup>	Amount in unrecorded alcohol (Average/Maximum) <sup>b</sup>
Acetaldehyde associated with consumption of alcoholic beverages	9/63 mg/l (beer); 34/211 mg/l (wine); 66/1159 mg/l (spirits) <sup>76</sup>	90/822 mg/l
Acrylamide	0-72 µg/kg (beer) <sup>c</sup>	(no data)
Aflatoxins	0.002/0.230 µg/L (beer) <sup>29</sup>	(not detectable in all samples)
Arsenic	0/102.4 µg/L (beer); 4/14.6 µg/L (wine); 13/27 µg/L (spirits)	(not detectable in all samples)
Benzene	10/20 µg/L in beer produced with contaminated CO <sub>2</sub>	(no data)
Cadmium	0.9/14.3 µg/L (beer); 1.0/30 µg/L (wine); 6/40 µg/L (spirits)	0/0.04 mg/L
Ethanol in alcoholic beverages	(2-80% vol)	(10-89% vol)
Ethyl carbamate (urethane)	0/33 µg/kg (beer); 5/180 µg/kg (wine); 93/6730 µg/kg (spirits); 744/22000 µg/kg (fruit spirits) <sup>9</sup>	0.5/5.4 mg/L
Formaldehyde	0 mg/L (beer); 0.13/1.15 mg/L (wine); 0.50/14.37 mg/L (spirits) <sup>23</sup>	0.22/6.71 mg/L <sup>23</sup>
Furan	3.3/28 µg/kg (beer) <sup>30</sup>	(no data)
Lead compounds, inorganic	2/15 µg/L (beer) <sup>31</sup> ; 57/326 µg/L (wine) <sup>32</sup> ; 31/600 µg/L (spirits)	0.03/1.4 mg/L
4-Methylimidazole	Caramel colored products: 9/28 µg/L in dark beer <sup>24</sup> ; 0/0.14 mg/L in whisky <sup>25</sup>	(no data)
N-Nitrosodimethylamine	0.1/1.3 µg/kg (beer)	(no data)
Ochratoxin A	0.05/1.5 µg/L (beer); 0.23/7.0 µg/L (wine)	(no data)
Safrole	0/6.6 mg/l (bitters/liqueurs/aperitifs) <sup>27</sup>	(no data)

563 <sup>a</sup> If no other source is stated, the data are taken from the IARC literature review<sup>3</sup> by calculating  
564 the average over all studies. Historical data (i.e. prior to implementation of mitigation  
565 measures) was not included.

566 <sup>b</sup> If no other source is stated, the data are taken from an European sample of unrecorded alcohol<sup>14</sup>

567 <sup>c</sup> Few surveys on acrylamide in alcoholic beverages are available. The majority of analyzed  
568 samples contained levels below the detection limit. The level of 72 µg/kg was reported in  
569 a single sample of wheat beer.<sup>33</sup>



570 Table 3. Dose response modelling results of WHO International Agency for Research on  
 571 Cancer (IARC) carcinogens occurring in alcoholic beverages

Agent	Toxicological Endpoint for Modelling <sup>a</sup>	Reference for Dose-Response Modelling Study	Reference for Original Data used for Modelling	BMDL <sub>10</sub> <sup>b</sup> [mg/kg bw/day]
Acetaldehyde	Tumour-bearing animals in male rats	<sup>35</sup>	<sup>36</sup>	56
Acrylamide	Harderian gland tumours in mice	<sup>37</sup>	<sup>38</sup>	0.18
Aflatoxin B <sub>1</sub>	Liver cancer in humans	<sup>39</sup>	<sup>40</sup>	0.00087
Arsenic	Lung cancer in humans	<sup>41</sup>	<sup>42</sup>	BMDL <sub>0.5</sub> : 0.003
Benzene	Lymphocyte count in humans	<sup>43</sup>	<sup>44</sup>	1.2
Cadmium	Human studies involving chronic exposures	<sup>45</sup>	<sup>45</sup>	NOAEL: 0.01 <sup>c</sup>
Ethanol	Hepatocellular adenoma or carcinoma in rats	<sup>21</sup>	<sup>4,46</sup>	700
Ethyl carbamate (urethane)	Alveolar and bronchiolar neoplasms in mice	<sup>10</sup>	<sup>46</sup>	0.3
Formaldehyde	Histological changes in the aerodigestive tract, including oral and gastrointestinal mucosa of rats	<sup>47</sup>	<sup>48</sup>	NOEL: 15 <sup>c</sup>
Furan	Hepatocellular adenomas and carcinomas in female mice	<sup>49</sup>	<sup>50</sup>	0.96
Lead	Cardiovascular effects in humans	<sup>51</sup>	<sup>52</sup>	BMDL <sub>01</sub> : 0.0015
4-Methylimidazole	Cancer of the lung in mice	<sup>53</sup>	<sup>54</sup>	NOAEL: 80 <sup>c</sup>
N-Nitrosodimethylamine	Total liver tumors	<sup>55</sup>	<sup>56,57</sup>	0.029
Ochratoxin A	Kidney adenoma and carcinoma in male rats	<sup>58</sup>	<sup>59</sup>	0.025
Safrole	Hepatic tumors in mice	<sup>60</sup>	<sup>61,62</sup>	3 <sup>d</sup>

<sup>a</sup> Human data was preferred over animal data, if available. Non-cancer endpoints were chosen if dose-response modelling for cancer effects was unavailable (such as in the case of lead). The most sensitive endpoint was chosen if dose-response data for several organ sites were available.

<sup>b</sup> BMDL<sub>x</sub>: lower one-sided confidence limit of the benchmark dose (BMD) for a x% incidence of health effect.

<sup>c</sup> No usable BMD-modelling for oral exposure was identified in the literature. The No Effect Level (NOEL) or No Observed Adverse Effect Level (NOAEL) are used in these cases instead.

<sup>d</sup> A range of "approximately 3-29 mg/kg bw/day" was provided as BMDL<sub>10</sub> for safrole<sup>60</sup>. As no further rationale was provided in the study, we chose the minimum of this range to provide a conservative assessment.

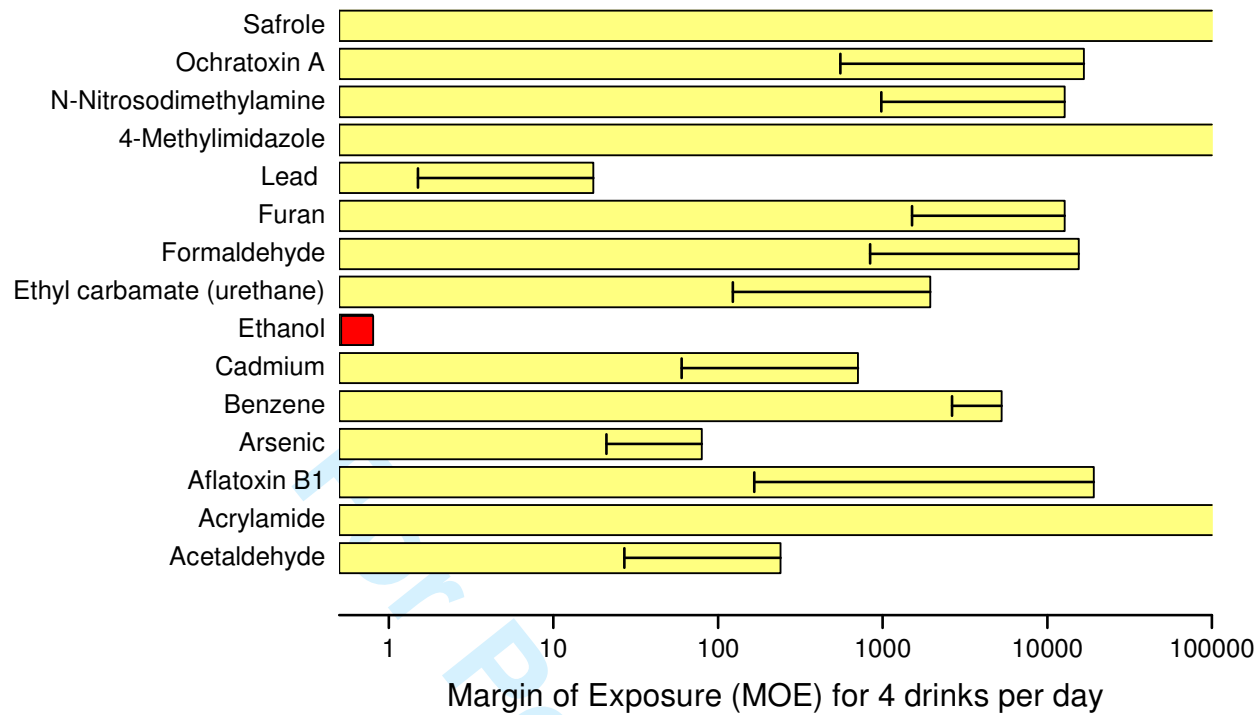
585 Table 4. Margin of Exposure (MOE) of WHO International Agency for Research on Cancer  
 586 (IARC) carcinogens occurring in alcoholic beverages calculated for different drinking and  
 587 contamination scenarios (MOE = BMDL or NO(A)EL / Exposure)

Agent	Type of alcohol	Scenario 1: One standard drink per day (low risk drinking guideline for females) <sup>a</sup>		Scenario 2: Heavy drinker (4 standard drinks per day, own categorization) <sup>a</sup>	
		MOE for average contamination	MOE for maximum contamination (Worst case)	MOE for average contamination	MOE for maximum contamination (Worst case)
Acetaldehyde <sup>b</sup>	Beer	1095	156	274	39
	Wine	696	112	174	28
	Spirits	1184	67	296	17
	Unrecorded	868	95	217	24
Acrylamide	Beer	∞ <sup>c</sup>	440	∞	110
Aflatoxin B <sub>1</sub>	Beer	76540	666	19135	166
Arsenic	Beer	∞	5	∞	1
	Wine	317	87	79	22
	Spirits	322	155	81	39
Benzene	Beer	21114	10557	5279	2639
Cadmium	Beer	1955	123	489	31
	Wine	4225	141	1056	35
	Spirits	2326	349	581	87
	Unrecorded	∞	349	∞	87
Ethanol	All	3.1	-	0.8	-
Ethyl carbamate (urethane)	Beer	∞	1600	∞	400
	Wine	25352	704	6338	176
	Spirits	4501	62	1125	16
	Fruit spirits	563	19	141	5
	Unrecorded	837	78	209	19
Formaldehyde	Beer	∞	∞	∞	∞
	Wine	48754	5511	12189	1378
	Spirits	41860	1457	10465	364
	Unrecorded	95137	3119	23784	780
Furan	Beer	51186	6033	12797	1508
Lead	Beer	132	17.6	33	4.4
	Wine	11	1.9	2.8	0.5
	Spirits	68	3.5	17	0.9
	Unrecorded	70	1.5	17	0.4
4-Methylimidazole	Caramel-coloured Beer	1564027	502723	391007	125681
	Caramel-coloured Whisky	∞	797342	∞	199336
N-Nitrosodimethylamine	Beer	51026	3925	12757	981
Ochratoxin A	Beer	87977	2933	21994	733
	Wine	45928	1509	11482	377
Safrole	Bitters/Liqueurs/Aperitifs	∞	634	∞	159

<sup>b</sup> A standard drink in Canada is considered to have a total of 13.6 grams of alcohol<sup>22</sup>. To recalculate the amount of contaminants per L or per kg to standard drink, portions of 341 ml (beer), 142 ml (wine), 43 ml (spirits and unrecorded) were chosen<sup>22</sup>. As no density was given in any of the contamination studies, 1 kg was set to equal 1 L for recalculation to volume if necessary. The exposure was estimated for the different drinking scenarios based on the occurrence data in Table 2 and a body weight of 60 kg.

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3 594 <sup>b</sup> Acetaldehyde directly contained in the beverages excluding metabolically formed acetaldehyde.  
4 595 <sup>c</sup> The lemniscate symbol indicates that the MOE was not calculable as the exposure was zero (i.e.  
5 596 below the detection limit of the applied analytical methodology)  
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**Figure 1.** Margin of Exposure (MOE) for carcinogens occurring in alcoholic beverages for heavy drinking scenario (averages based on data from table 4; error bar indicates worst case contamination).



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Margin of Exposure (MOE) for 4 drinks per day