



September 25, 2013

To the members of the 2015 Dietary Guidelines Advisory Committee:

The American Society for Nutrition (ASN) appreciates the opportunity to submit comments to the 2015 Dietary Guidelines Advisory Committee (DGAC). ASN, the premier non-profit, scientific society dedicated to bringing together the world's top researchers to advance our knowledge and application of nutrition, submits the following recommendations as you consider the topics which have the strongest evidence to support updated recommendations in the Dietary Guidelines for Americans, 2015. Founded in 1928, ASN has more than 5,000 members working in academia, clinical practice, industry, and government who conduct research to help all individuals live healthier, more productive lives.

Research Recommendations

ASN encourages the DGAC to include research recommendations in the *Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans, 2015*. It is an essential function of the DGAC to generate research recommendations based on the Nutrition Evidence Library evidence-based systematic review of the scientific literature. These research recommendations are used by a number of individuals and groups to guide future research efforts and are translated into research funding priorities.

Dietary Patterns

ASN encourages the DGAC to provide recommendations based on healthful dietary patterns supported by the scientific literature. Recommendations for single foods and nutrients are useful, yet may be somewhat limiting given the complex interactions of combinations of nutrients and foods consumed and their impact on health. ASN supports food-based dietary recommendations and believes that the need to balance nutrients, foods and behaviors to achieve a healthful eating pattern should be highlighted. Healthful dietary patterns are also influenced by a number of factors, including cultural, social, and environmental factors that ASN urges the DGAC to consider. ASN encourages the DGAC to utilize the most current epidemiologic nutrition information and statistics available to them through the National Health and Nutrition Examination Survey (NHANES), Healthy Eating Index (HEI) scores, etc. Food modeling variations on dietary patterns may also be a useful supplement to the systematic review to help the DGAC develop practical advice related to dietary patterns that is geared to the general population.

Eating Habits

ASN urges the DGAC to provide practical guidance to consumers related to eating occasions and other eating habits. Snacking now accounts for 20% of eating occasions in the US and more than half of all Americans snack multiple times a day (NPD 2012). Scientific evidence continues to show that eating behaviors play as important a role as

what we eat in defining our health. Research indicates that eating habits and behaviors, such as eating breakfast (Odegaard et al. 2013) and eating as a family (Fulkerson et al. 2013), may positively impact health while distracted eating behaviors, such as eating in front of a screen, may lead to increased food intake (Robinson et al. 2013).

Nutrient Density

ASN encourages the DGAC to list nutrient density as an important area that deserves continued research. Since there is no consistent, standard definition of nutrient density, the concept is not easily understood by consumers. There are currently numerous definitions for nutrient density and multiple rating systems that show the “nutrient density” of various food products. ASN supports recommendations for a standardized definition for nutrient density and for specific types of nutrient-dense foods to be encouraged for consumption.

Discretionary Calories

ASN encourages the DGAC to eliminate use of the term discretionary calories because of the difficulty for consumers to accurately comprehend its intent.

Nutrients of Concern

ASN supports highlighting the “nutrients of concern” that continue to be consumed in marginal amounts by subgroups of the American public, such as potassium, Vitamin D, folate, dietary fiber, vitamin B₁₂, iron and calcium. ASN welcomes recommendations from the DGAC regarding food sources and amounts of nutrients of concern needed to meet recommendations.

Dietary Fiber

ASN supports recommendations for a consistent, standard definition for dietary fiber. Bran and cereal fibers are important sources of dietary fiber, as well as whole grains, that a healthful diet may entail. The current evidence supports the many benefits of a diet rich in varied foods contributing dietary fiber. A recent literature review determined that there is moderate evidence that consumption of foods rich in cereal fiber or mixtures of whole grains and bran is associated with a reduced risk of obesity, type 2 diabetes or cardiovascular disease (ASN 2013). ASN encourages the DGAC to discuss practical approaches for the general population to meet dietary fiber needs, and to undertake a dialogue on the important role of enriched grain sources, as well as whole grains, in helping consumers meet all of their nutrient needs.

Caffeine

ASN suggests that the DGAC consider the impact of excess caffeine consumption on health to determine if recommendations for maximum safe levels of consumption are warranted, primarily for children and adolescents. A review of exposures over a 1-year period reported to the US National Poison Data System found that approximately half of

the energy drink-related toxicity cases involved unintentional exposure by children less than 6 years old (Seifert et al. 2013). Although average caffeine consumption from natural food/beverage sources has been linked to positive health outcomes, a wide range of adverse health effects have been linked to excess caffeine consumption, most commonly irritability, tachycardia, nausea, and vomiting, but even including death (Bronstein et al. 2012).

Probiotics and the Microbiome

Research has begun to show that diet and gut microbiota interactions significantly impact human health and disease (IOM 2013), though the science on the exact mechanisms of how probiotics influence the microbiome and health continues to evolve. Although there is insufficient evidence thus far to make recommendations related to pre/probiotic consumption for the general public, ASN asks that the DGAC recommend continued research in this important and promising area.

We hope these comments are useful as the DGAC moves forward with its deliberations. The American Society for Nutrition (ASN) stands ready and welcomes opportunities to assist the DGAC in pursuit of our common goals to improve the health and wellbeing of all Americans. Please contact Sarah Ohlhorst, MS, RD, Director of Government Relations [sohlhorst@nutrition.org; 301.634.7281], should you have any questions or if ASN may provide additional assistance.

Sincerely,



Gordon Jensen, M.D., Ph.D.
2013-2014 President

References

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