



American Society for Nutrition
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Carole Davis
DGAC Co-Executive Secretary
USDA Center for Nutrition
Policy and Promotion
3101 Park Center Dr., Room 1034
Alexandria, VA 22302

Kathryn McMurry
DGAC Co-Executive Secretary
HHS Office of Health Promotion/
Disease Prevention
1101 Wootton Parkway, Suite LL100
Rockville, MD 20852

Dear Ms. Davis and Ms. McMurry:

The American Society for Nutrition (ASN) is pleased to comment on the 2010 Dietary Guidelines Advisory Committee's (DGAC) Final Report. The Society has appreciated serving as a resource during the 2010 Dietary Guidelines process. We would like to express our deep gratitude to the Committee, as the charge before them was no easy task and each member donated significant time and effort to creating this report. A number of challenging questions were presented to the Advisory Committee and ASN is grateful to see that nearly all of our recommendations were addressed in some manner. ASN would like to highlight the following accomplishments of the Committee:

- The desire to instill better understanding of the guidelines among all groups and stakeholders is laudable. ASN supports a multi-sectoral strategy, and praises the inclusion of schools, preschools, educators, public health advocates, and policy makers in implementation of the strategic plan.
- We are pleased to see that the contribution of sodium in the diet received a rigorous discussion and support a stepwise approach to sodium reduction. However, we want to emphasize that the economic implications of sodium reduction must be taken into account as society moves toward 1,500 mg per day. We must consider the cost of reducing sodium in food products. The safety of foods which depend on salt as a preservative is a competing priority that deserves consideration in strategic planning for reducing salt intake.
- The conclusion that Americans overconsume foods high in solid fats and added sugars (SoFAS), and should replace them with vegetables, fruits, and whole grains, is an effective and understandable message for consumers. We were pleased with the attention given to energy dense foods which include fats as well as sugars.
- The Supplemental Information pieces on Children's Dietary Intake, Implications of Food Allergens/Safe Food Supply, and Organically Produced Foods are valuable and welcomed additions.

Finally, we would like to offer the following recommendations:

- We are pleased to see that the Call for Action urges Americans to meet the 2008 Physical Activity Guidelines. To encourage increased activity levels, we recommend adding a brief

summary of what those guidelines recommend, i.e., how many minutes per day for various age groups.

- The definition of processed food in the Glossary is vague and could be misleading. Moreover, it casts a negative light on foods that are washed, frozen, dried, etc. We recommend leaving this term out of the consumer literature to prevent confusion.
- In 2009 we recommended creation of a focus group of Dietary Guidelines users from the food industry, medical and public health communities, and the general public to review the Guidelines and provide input on how to implement the recommendations. We urge this focus group be convened now.
- We applaud the call to create greater financial incentives to purchase and consume vegetables, fruit, whole grains, milk products, and seafood and urge the Committee or the focus group to outline what those potential incentives could include.
- Looking ahead to 2015, we recommend increasing the number of behavior specialists who serve on the committee to help with translating and implementing the changes which the guidelines promote.

We hope these comments are useful as implementation of the guidelines moves forward. Please do not hesitate to contact John Courtney, ASN's Executive Officer, by phone at (301) 634-7050 or by email at jcourtney@nutrition.org should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Robert M. Russell". The signature is fluid and cursive, with the first name "Robert" being the most prominent.

Robert M. Russell, MD
President