



American Society for Nutrition
Excellence in Nutrition Research and Practice

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Designated Federal Officer
2015 Dietary Guidelines Advisory Committee
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Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary for Health
U.S. Department of Health and Human Services
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Colette I. Rihane, M.S., R.D.
Lead USDA Co-Executive Secretary
2015 Dietary Guidelines Advisory Committee
Director, Office of Nutrition Guidance and Analysis
Center for Nutrition Policy and Promotion
U.S. Department of Agriculture
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Re: The *Dietary Guidelines for Americans, 2015*

Dear Dr. Olson and Ms. Rihane:

The American Society for Nutrition (ASN) appreciates the opportunity to comment on the Scientific Report of the 2015 Dietary Guidelines Advisory Committee (DGAC), as you consider the scientific basis for, and craft, the eighth edition of the *Dietary Guidelines for Americans*. ASN is the premier non-profit, scientific society dedicated to bringing together the world's top researchers to advance our knowledge and application of nutrition. 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 lives.

ASN's comments to the U.S. government focus on translation of the Scientific Report of the 2015 DGAC into dietary guidance that is easily implemented by the general public. Specific recommendations are listed below and elaborated on in the following sections.

- Craft dietary recommendations with a strong scientific basis, anchored by evidence-based, peer-reviewed literature;
- Create clear, consistent messages that most effectively communicate dietary recommendations to the general public;

- Maintain a focus on healthful dietary patterns and a total diet approach;
- Consider cultural, social, and economic factors that affect food intake and other food-related behaviors, and therefore affect implementation of the *Guidelines*, such as accessibility, affordability, marketing, and cultural norms;
- Continue to emphasize calorie reduction and physical activity for obesity prevention;
- Create collaborative, multi-disciplinary partnerships with a range of expertise to implement the *Dietary Guidelines for Americans*;
- Create a focus group of potential *Dietary Guidelines* users from the general public to provide insight on meaningful implementation messaging and activities;
- Pursue further development and implementation of consistent and uniform methodologies to grade the quality of research to reinforce the scientific evidence basis for future versions of the *Dietary Guidelines*.

ASN commends the work of the 2015 DGAC and notes the important contributions of many ASN members that led to this report. ASN supports a strong scientific basis for dietary recommendations, anchored by evidence-based, peer-reviewed literature. ASN applauds the use of the USDA Nutrition Evidence Library to analyze the existing peer-reviewed scientific literature whenever possible, and food modeling as a supplement to the systematic review process, in order to modify dietary recommendations to fit the needs of certain subpopulations representing a variety of cultural norms, food behaviors, and food budgets. ASN encourages the government to pursue further development and implementation of consistent and uniform methodologies to grade the quality of research to reinforce the scientific evidence basis for future versions of the *Dietary Guidelines for Americans*.

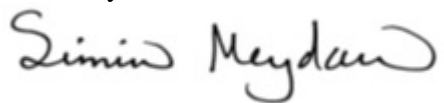
ASN commends the Committee's focus on healthful dietary patterns, which allow individuals to consume a wide range of foods and beverages to meet nutrient needs in a variety of ways that best suit their lifestyles. ASN urges the government to maintain a total diet approach in its translation of the report to dietary guidance. ASN supports dietary guidance that helps consumers to select nutrient-rich foods and beverages as part of a healthful diet and that leads to positive behavior changes. It is especially important for the government to consider the Committee's recommendation that dietary guidance should account for cultural, social, and economic factors that affect dietary patterns and eating behaviors and habits, such as snacking, during development of the *Dietary Guidelines for Americans*. ASN also assumes that a focus on calorie reduction and obesity prevention will continue to be emphasized, along with the need to balance calories with physical activity in order to manage weight and lead a healthy lifestyle. With the implementation of menu labeling by December 1, 2015 by all food service establishments with more than 20 outlets, we encourage the government to include the advice that Americans check the nutrition information on all ready-to-eat food products before purchase.

ASN encourages the government to carefully consider the recommendations within the Scientific Report to create clear, consistent messages that most effectively communicate dietary guidance to the general public and are based on the strongest evidence. Some statements in the report may be confusing if translated directly to consumers without providing context or if taken in isolation. For example, Chapter 5 states that aspartame in amounts currently consumed is safe and poses minimal health risk, while Chapter 6 states that low-calorie sweeteners should not be used as a primary replacement for added sugars in the diet. The first statement addresses a safety issue and the second provides a health recommendation, but these could easily be misconstrued. Effective messaging should include consideration of important factors that influence food intake and other food-related behaviors, and therefore affect translation and implementation of the *Guidelines*, such as food accessibility, affordability, marketing, and culture.

ASN recognizes that the government calls on its many experts within USDA and HHS from a range of disciplines as the *Dietary Guidelines* are crafted. Similarly, we encourage the Secretaries of HHS and USDA to forge multi-disciplinary partnerships to implement the *Dietary Guidelines* and to include a range of expertise, including nutrition, agriculture, food science, culinary, dietetics, behavior, economic and public health professionals. ASN also suggests the use of a focus group of potential *Dietary Guidelines* users from the general public, the food industry, and medical and public health communities to provide insight about the implementation of dietary recommendations found in the DGAC report. Collaboration among the aforementioned disciplines and agencies will be important to effective implementation of the *Dietary Guidelines*.

Thank you for the opportunity to provide comments. ASN stands ready and welcomes opportunities to assist the government as implementation of the *Dietary Guidelines* moves forward. 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 information.

Sincerely,



Simin Nikbin Meydani, D.V.M., Ph.D.
2014-2015 President

Cc: Kellie Casavale, Ph.D., R.D., HHS
Shanty A. Bowman, Ph.D., USDA