



June 5, 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), as you consider the scientific basis for 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. 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.

The ASN membership has a wealth of expertise in nutrition science across the entire research spectrum from basic science to health policy, from discovery to application. ASN is proud of our members who currently serve on the DGAC and those who have served on past Committees. We welcome the opportunity to serve as a resource for the DGAC as you move forward with the evaluation of the latest nutrition science. ASN offers our assistance in identifying subject matter experts to brief the DGAC on select topics when necessary. ASN has 15 Research Interest Sections to draw from, with experts in such topical areas as Aging and Chronic Disease; Diet and Cancer; Obesity; Community and Public Health Nutrition; and Nutritional Epidemiology, to name a few.

ASN submits the following recommendations for the DGAC to consider in development of the Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans, 2015:

- ASN applauds the use of the USDA Nutrition Evidence Library to analyze the existing peer-reviewed scientific literature on food, nutrition and health and supports a strong scientific basis for all dietary recommendations. Food modeling may be a useful supplement to the systematic review in order to modify dietary recommendations to fit the needs of certain subpopulations, including children, older adults, vegetarians, and those with lactose intolerance.
- ASN urges the DGAC to consider the behavior changes necessary for Americans to translate and implement the dietary recommendations set forth in the Guidelines in order to improve compliance with the Guidelines. Food accessibility, affordability, marketing, and culture are all factors which may have a significant influence on food intake and other food-related behaviors, and therefore affect translation and implementation of the Guidelines. ASN believes that the need to balance nutrients, foods and behaviors to achieve a healthful eating pattern should be highlighted.
- ASN encourages the DGAC to highlight the intersection of physical activity and diet as contributors to a healthy lifestyle. ASN supports the need to balance calories with physical activity in order to manage weight and lead a healthy lifestyle.

- ASN supports recommendations regarding a definition and sources of nutrient-dense foods, given that most Americans overconsume energy-dense foods and beverages typically higher in saturated and *trans* fats and added sugars.
- ASN welcomes recommendations from the DGAC regarding food sources and amounts of dietary fiber, including bran and cereal grains, and recommendations on the various types and amounts of mono- and polyunsaturated fats that a healthful diet may entail.
- ASN supports flexibility in food choices and dietary patterns to achieve micronutrient adequacy. Focus should again be given to “nutrients of concern,” such as potassium, folate, fiber, vitamin B₁₂, iron and calcium that continue to be consumed in marginal amounts by subgroups of the American public. Guidance regarding appropriate consumption of dietary supplements and fortified foods to achieve micronutrient needs of different subgroups is also needed.
- ASN recommends the creation 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 to the DGAC regarding the implementation of dietary recommendations. ASN encourages an integrated, inclusive approach that considers the insight of all stakeholders, including food scientists and technologists who may be tasked with adding, reducing or removing nutrients from the food supply or developing alternative ingredients to help achieve dietary guidance.

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 D. Ohlhorst, MS, RD, Director of Government Relations, sohlhorst@nutrition.org or 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