



American Society for Nutrition
Excellence in Nutrition Research and Practice
www.nutrition.org

February 2, 2010

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) appreciates this opportunity to submit comments to the 2010 Dietary Guidelines Advisory Committee (DGAC) in advance of the fifth meeting on Feb 9-10, 2010. We are pleased that the DGAC has taken on numerous challenging questions in a rigorous, thoughtful manner.

As the Committee engages in final deliberations on the topics and questions, we offer the following points:

- Increased flexibility in food choices and an emphasis on a balance of nutrients, foods, and behaviors to achieve a healthful eating pattern is essential. We applaud the steps to elevate the importance of plant foods in the American diet; however, we recommend an approach that will emphasize the value of a balance of both plant and animal proteins, particularly given the unique nutrient profiles provided by various protein sources. Food modeling is a critical process for discerning the importance of a variety of foods in certain quantities. This modeling process illustrates the difficulty in meeting all nutrient requirements if an entire food group (such as milk and milk products, legumes, meat, vegetables) is eliminated from the diet.
- In challenging economic times such as those in which we currently find ourselves as a nation, it can become even more difficult to eat healthfully, both from the standpoint of access and cost. Many individuals are unable to access consistently fresh foods, for example, and we encourage the inclusion of reasonable alternatives such as frozen, dried and canned varieties, where appropriate and based on evidence, in recommendations. We understand the economics of healthful eating has been a discussion point and are pleased to see the Committee addressing this important area.
- We are pleased to see the strong focus on the contributing role of sodium in the diet to the development and exacerbation of hypertension. However, it is important not to forget that the guideline recommendations put forth must be feasible. In translating the scientific findings of the DGAC on this topic, it will be critical to ensure that guidance is communicated in a way that Americans can achieve the level recommended. Given that the current, average sodium intake levels in the American diet is 3,400 mg per day (and as high as 4,500 mg per day in certain subgroups), it is likely that a stepwise approach will be needed to move people from where they

are today to where the science says is optimal for health.¹ Moreover, there are food safety considerations that must be taken into account regarding sodium in certain products in the food supply. For example, a certain level of sodium in processed cheese and meats is required to prevent the growth of the spores of *Clostridium botulinum*. It is important to weigh carefully the benefit to health of less sodium in the food supply against the cost of a potentially greater risk of foodborne illness if sodium is indiscriminately lowered in certain types of commonly consumed foods without careful experimental studies to ensure the safety of the reformulated products.

- There has been strong attention to and discussion in the media, with consumers, and among health advocates about added sugars and the role they play in the diet, especially as it relates to obesity. Additional guidance in this area is important, but only if the Committee believes the science base is there to support a statement or recommendation. If the science is not yet sufficient to permit recommendations to be made, a DGAC call for additional research and a state of the science conference on the subject would be appropriate and helpful.
- The translation of the DGAC report into the *Dietary Guidelines for Americans*, the food guidance system (including MyPyramid), and other educational tools for consumers should be transparent. The DGAC should be informed about the translation and the content in the final report before it is released and perhaps given an opportunity to review it. This will enable the DGAC to provide better support for the final document.

We hope these comments are useful as the Committee moves forward with its work. Please do not hesitate to contact Mary Lee Watts, ASN's Director of Science and Public Affairs by phone at (301) 634-7112 or by email at mwatts@nutrition.org should you have any questions.

Sincerely,



Robert M. Russell, MD
President

¹ U.S. Department of Agriculture, Agricultural Research Service, 2007. *Nutrient Intakes from Food: Mean Amounts Consumed Per Individual, One Day, 2003-2004*.