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Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom It May Concern:

The Mission and Vision Statements of the USDA are:

USDA Mission: Enhance the quality of life for the American people by supporting production of agriculture:

- ensuring a safe, affordable, nutritious, and accessible food supply
- caring for agricultural, forest, and range lands
- supporting sound development of rural communities
- providing economic opportunities for farm and rural residents
- expanding global markets for agricultural and forest products and services
- and working to reduce hunger in America and throughout the world.

USDA Vision: A healthy and productive Nation in harmony with the land.

They give the impression more of a trade organization than a consumer advocacy group. The Department promotes the US agricultural industry in its many forms while also trying to serve the public.

Advocating for both industry and consumer may create a conflict of interests. The USDA might dichotomize and advocate for each separately.

I have been following the Food Guide Pyramid Reassessment "forum" with interest. To date, several points strike me as significant:

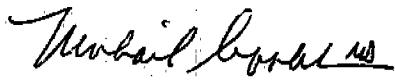
1. Individual accounts are subjective. There is science behind nutrition. The human body is governed by the Laws of Thermodynamics. The Energy Balance Equation holds true. The question remains how to communicate this information.
2. There is an attempt to demonize certain macronutrients. For example, some contributors consider carbohydrates a source of evil, others fat. Movements appear afoot to advocate for the commercial interests of various corporations who stand to benefit financially from "unbalanced" diets.

3. Personal testimonials, though interesting, are anecdotal in nature. The stories in favor of so-called "low-carb" diets represent forms of rescue for some who already developed weight and weight-related problems. Prevention is different from treatment. Extrapolating from these experiences can be likened to giving antibiotics to prevent urinary tract infections or chemotherapeutic agents to prevent cancer. The USDA Food Guide graphic should, at this stage, focus primarily on the ounces of prevention, not the cure of pounds. It seems important to recognize that the fittest people on the planet, athletes, eat balanced diets (diets comprising all three macronutrients: carbohydrate, protein and fat).

4. Changing the graphic from a pyramid to a different one will, in my opinion, get more attention. It is the very familiarity of the Food Guide Pyramid that will create disregard if only its content changes. Even toothpaste manufacturers change their packaging to attract the eyes of consumers.

5. It is possibly hubristic for the USDA to believe that changing the Food Guide graphic will be a major step towards solving the weighty weight problem in this country. I suspect that the number of people educated by any Food Guide graphic will pale in comparison to the number of people persuaded by the media. Advertising, talk shows, news magazines, etc., likely exert a greater sway on the public. Despite the good efforts of the USDA, the option of forming alliances with the FCC, HHS and other agencies for education and enforcement may achieve more than merely altering the Food Guide graphic.

Sincerely,



Michael Applebaum, MD