The Listening Sessions met in the USDA Whitten Building, Room 104-A, 1400 Independence Avenue, S.W., Washington, D.C. 20250, at 10:00 a.m., Kathy Romero, Facilitator, presiding.

PRESENT

KATHY ROMERO, Facilitator
SUSAN COLE, Executive Communication Analyst, CNPP
EVE ESSERY STOODY, Scientific Integrity Officer, CNPP
STEPHENIE FU, Senior Policy Advisor, CNPP
ERICA GAVEY, Nutritionist Consultant, CNPP
BROOKE HARDISON, Communications Coordinator and Spokesperson for Nutrition Programs, USDA
JACKIE HAVEN, Deputy Director, CNPP
JESSICA LARSON, Nutritionist, USDA
TRICIA PSOTA, Nutritionist, CNPP
ELIZABETH RAHAVI, Nutritionist, CNPP
ANGIE TAGTOW, Executive Director, CNPP
ALSO PRESENT

BETSY BOOREN, North American Meat Institute
ROBERT BURNS, Grocery Manufacturers Association
KRISTINA BUTTS, National Cattlemen's Beef Association
LORELEI DISOGRA, United Fresh Produce Association
P. COURTNEY GAIN, The Sugar Association, Inc.
MAGGIE SOMMERS GENTILE, Food Directions LLC, representing National Turkey Federation
RANDY GREEN, Watson Green LLC, representing United Egg Producers
SANJAY GUMMALLA, American Frozen Food Institute
TAMAR MAGARIK HARO, American Academy of Pediatrics
CHRISTINA HARTMAN, American College of Cardiology
LINDSEY HAYNES-MASLOW, Union of Concerned Scientists
COLETTE HEIMOWITZ, Atkins Nutritionals, Inc.
ERIC HENTGES, ILSI North America
MAIA M. JACK, American Beverage Association
MICHAEL F. JACOBSON, Center for Science in the Public Interest
BETH JOHNSON, Food Directions LLC
GUY JOHNSON, McCormick Science Institute
JULA J. KINNAIRD, Kinnaird+Mangan, representing Wheat Foods Council
BECCA KLEIN, Consultant to Friends of the Earth
RIMA KLEINER, National Fisheries Institute
PAMELA KOCH, Teachers College Columbia University
DANIEL A. KOVICH, National Pork Producers Council
ELIZABETH KUCINICH, Plant-Based Foods Association
MELISSA MAITIN-SHEPARD, American Cancer Society
FARIDA MOHAMEDSHAH, Institute of Food Technologies
SARAH D. OHLHORST, American Society for Nutrition
ALSO PRESENT (cont.)

MARY PAT RAIMONDI, Academy of Nutrition and Dietetics
LORRENE RITCHIE, Nutrition Policy Institute
MICKEY RUBIN, National Dairy Council
LEE SANDERS, American Bakers Association
STEPHANIE SCARMO, The Pew Charitable Trusts
NINA TEICHOLZ, The Nutrition Coalition
DOROTHEA VAFIADIS, American Heart Association
DAVID WALSH, Snack Food Association
KRISTIN PEARSON WILCOX, International Bottled Water Association
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MS. ROMERO: Okay, let's go ahead and get started. On behalf of USDA, I want to thank you for participating in this Listening Session today. USDA appreciates your insights as a leading organization interested in the Dietary Guidelines for Americans.

My name is Kathy Romero, and I'm your facilitator for today. Our host is USDA Center for Nutrition, Policy and Promotions. And listening in today we have the CNPP Executive Director, Angela Tagtow, and Deputy Director, Jackie Haven.

So the purpose of this session which I'm sure you all saw in the mail that you received is to get comments from leading member-based organizations such as yours. We need to get the greatest diversity of perspectives on the process for developing future editions of the Dietary Guidelines.

In addition to considering your member
base, USDA also considered other factors such as representation across the health and nutrition sciences, the level of engagement during the 2015-2020 Dietary Guideline development process, and the representation of diversity across the food and beverage categories.

There are three Listening Sessions being held, and they will include folks from the professional health organizations and consumer advocacy groups, trade organizations, and federal agencies.

Your remarks are going to be recorded and shared verbatim, and that's what these machines are here is to catch your remarks. When you have -- when it's your turn to speak make sure you turn this to green, and when you're done speaking you can turn it to red again. Your remarks are going to be recorded and shared with the Institute of Medicine Food and Nutrition Board prior to their initiation of a comprehensive study of the development process for the Dietary Guidelines. That was a directive
that was outlined in the 2016 Consolidated Appropriations Act.

Today your remarks should address or can address how the Dietary Guidelines can prevent chronic disease, insure nutritional sufficiency for all Americans, and accommodate a range of individual factors, including age, sex, and metabolic health. Your remarks may address processes for selecting the Advisory Committee, or methods used to review scientific evidence, or processes for developing the Dietary Guidelines across a life span, and this is actually per the 2014 Agriculture Act which states that the 2020 to 2025 edition of the Guidelines will expand to include nutrition guidance for infants and toddlers, birth to 24 months, and women who are pregnant.

We have some housekeeping. The first thing I want to do is I want to talk about this beautiful table. This is a 36 by 12 mahogany and leather table and it was built specifically for the Summit of Industrial Nations. It was held
here in Williamsburg in May of 1983 and hosted by
President Ronald Reagan, and this is actually a
national treasure so that's why they don't allow
food and beverages, and we appreciate that from
you all.

You have the opportunity to provide up
to five minutes of oral remarks at this Listening
Session. And all your oral remarks, again, they
will be recorded. At the beginning of your oral
remarks please clearly state your name and the
organization you're from so that we have at the
beginning of each one.

Time keepers are available. These two
ladies right here are your time keepers, and
she'll do for this side and she'll do for this
side so you should be able to see. And they'll
let you know when you have one minute left on
your remarks, 30 seconds, and when your time is
up. And I will be very firm when your time is up,
and that's so that everybody gets the opportunity
to do their five minutes of remarks.

The advantage that you have is that if
you do have those written down, you can leave those outside with Susan at the table as you leave and those remarks, if you don't get to quite finish everything in your five minutes, you can leave it out there and they will send those along to Institutes of Medicine.

Okay. To reiterate, this is a Listening Session. It's an opportunity for USDA to hear your perspective on the Dietary Guidelines development process. We're going to go in alphabetical order by the name of the organization. And then following today's session, USDA is going to provide an unedited transcript to the Institute of Medicine. This preliminary assessment is not meant to override IOM's plan to gather its own information from stakeholders, which they -- USDA anticipates they will be doing that as part of their independent study.

So let's go ahead and get started. We are going to start with Ms. Raimondi, so your time is now.

MS. RAIMONDI: Mary Pat Raimondi with
the Academy of Nutrition and Dietetics.

Three points; how the Dietary Guidelines will help reduce chronic disease. The face of America is changing with an aging population to a burden of underfed and overweight population and increased disease. We support the Committee's decision to discuss types of foods associated with favorable clinical outcomes and chronic disease factors. This will help assure the Guidelines will be appropriate for the majority of all Americans.

We also commend the use of the socio ecological framework to guide its work. This model has been used successfully in many of our nutrition interventions, and nutrition education programs.

For the selection of the Dietary Guidelines Advisory Committee we did find the selection process was transparent, had minimal bias, and included balanced members views.

If we talk about the methods of the evidence, the Academy of Nutrition and Dietetics
Evidence Analysis Library was established in 2004. The Nutrition Evidence Library, or NEL, was launched in July 2008 by the USDA Center for Nutrition, Policy and Promotion, and it mirrors the Academy's EAL, but it specializes in systematic reviews to inform federal nutrition-related policies and programs.

The NEL conducts systematic reviews on food and nutrition topics related by vigorous, transparent, and reproducible methodology to support federal nutrition policies. NEL uses the same methods which includes risk of bias tool, transparent search plan, data extraction and aggregation, as other gold standard institutions use. However, systematic reviews in nutrition are challenging and the NEL has the expertise and experience to do these unique studies.

Nutrition-focused systematic reviews, unlike pharmaceutical research, uses a plethora of methodologies and not just randomized clinical trials. The reason for the smaller pool of clinical trials in nutrition-led literature is
multi-factorial, but basically it's because people must eat to survive, so pure controlled groups are difficult.

The strong rating is reserved for bodies of evidence completely free from study design concerns or disagreements between findings. The nature of science is that a small number of contrary findings is expected and a preponderance of evidence can overcome these limitations. Recommendations with a moderate rating which indicates a sizeable body of well-designed research which the Committee had no more than minor doubts are more than sufficient to inform the Dietary Guidelines for Americans. The exclusion of recommendations with a moderate rating would have eliminated several uncontested truths from the record available to USDA.

Currently, the published food and nutrition research has been funded by government, foundation, and industry, and as a mixture of clinical trials, observational trials, cohort, and case studies. If our goal is to guide
Americans on healthy eating choices to reduce disease, then conclusion statements that are less than grade one must be accepted. This at a time that rigorously designed food and nutrition studies are funded to fill -- to prevent the prevailing nutrition research gaps.

The scientific conclusions used more than one question or source of evidence, such as the NEL systematic reviews. The Committee considered seven questions examining the relationship between dietary patterns and health outcomes. They also used a process known as food pattern modeling to describe the combinations of food and drinks a person should consume to meet the nutrient needs and the impact to help reduce disease.

They took the science and brought it into the real world of how we eat. These actions are reflected in the 2015 Guidelines. It would be helpful, though, to let consumers know that science changes and that more knowledge is a positive thing. We also believe that the improved
Dietary Guidelines affords the food industries an opportunity to innovate and reformulate products to be a partner to improve health.

Industry's positive roles in implementing these Guidelines over the past decades should be recognized and applauded along with our USDA and HHS nutrition scientists.

MS. ROMERO: Thank you very much.

MS. HARO: Tamar Magarik Haro, American Academy of Pediatrics. Thank you for inviting us to be here today. I'm speaking on behalf of the American Academy of Pediatrics which is a nonprofit professional organization of 64,000 primary care pediatricians, pediatric medical sub-specialists and pediatric surgical specialists dedicated to the health, safety, and well-being of infants, children, adolescents, and young adults.

The Dietary Guidelines for Americans are DGAs play a crucial role in the lives of millions of children. Pediatricians routinely look to the Dietary Guidelines to provide advice
to our patients, and we do so with confidence
that the best available scientific evidence
available was used to inform the recommendations.
It is because these Guidelines are based on
science and evidence that the American public can
put their trust in them.

The Dietary Guidelines underpin key
federal nutrition programs like WIC and the
School Meals Program, and at a time when 21
percent of our children live in poverty and one
in three children have overweight or obesity, the
Dietary Guidelines help empower families to
tackle the double burden of food insecurity and
obesity by influencing the foods children eat in
school and the choices families make at home.

The AP recognizes and commends Dr.
Steven Abrams for his service on the Dietary
Guidelines Advisory Committee or the DGAC. We
believe the DGA process was enhanced by his
involvement on the DGAC. In light of the fact
that key federal nutrition programs which serve
millions of children are tied to the expert
advice of the DGAs, it is essential that pediatricians continue to be chosen to serve on the DGAC or any expert body providing nutrition advice to the federal government involving children.

Similarly, it will be important that any entity that evaluates the DGA process be comprised of experts in nutrition science, including a pediatric subject matter expert.

We applaud the outstanding work of USDA and HHS on the scientific evidence-based assessment of nutrition for our youngest children, birth to 24 months. The time period from pregnancy through early childhood is one of rapid physical, cognitive, emotional, and social development, and because of this early nutrition sets the course for preventing many diseases, even those that would occur in adulthood such as obesity, cardiovascular disease, and diabetes. And childhood deficiencies of key micro nutrients during this vulnerable period of development from birth to 24 months can lead to delays in
attention and motor development, poor short-term memory, and lower IQ scores.

The AP looks forward to the inclusion of science-based Dietary Guidelines for children birth to 24 months in the 2020 Dietary Guidelines for Americans. Waiting until age two in order to influence a child’s diet may be too late for many children.

As the Institute of Medicine, USDA, and other agencies consider the makeup of the next DGAC, it will be critical that at least one member be a pediatrician with expertise in this unique age group. The AP feels that this is essential to insuring a seamless adoption of the birth to 24 month guidelines into the 2020 DGAs.

The AP has been dismayed by the unprecedented and coordinated attack on science and the DGAC that has occurred over the past couple of years. It is critical that the DGA process be driven by nutrition science and free of political and industry interference. Efforts by some in Congress would have hindered the
federal government's ability to provide the best available advice to millions of children and their families on healthy diets and lifestyles. Our patients, children and their families, deserve nutrition guidance that is free of political and industry interference and based on sound science.

The five-year revision of the DGAs must continue so that the Guidelines are updated to reflect the best available nutrition science. This process is necessarily lengthy and intentionally removed from the political process. The expert members of the 2015 DGAC were scientists, doctors, and nutritionists who were nominated by their peers and selected by the federal government after a rigorous vetting process. Their processes were open and transparent with appropriate opportunities for public comment.

The AP welcomed the 2015 DGAs which for the first time recommended limiting the consumption of added sugars to less than 10
percent of calories per day, and continue to recommend more consumption of vegetables, fruits, whole grains, and lean proteins, and less sodium and saturated fat, all of which support a healthy eating pattern for families and is consistent with the advice pediatricians give their patients.

We look forward to working with the USDA as a MyPlate National Strategic Partner and continue dissemination of the DGAs. Thank you for the opportunity to speak today.

MS. ROMERO: Thank you very much.

MS. MAITIN-SHEPARD: Hi, I'm Melissa Maitin-Shepard. I'm with the American Cancer Society, Cancer Action Network, and I'm speaking today on behalf of both the American Cancer Society and the American Cancer Society Cancer Action Network referred in my remarks at ACS CAN. Thank you very much for the opportunity to provide comments today.

The Society is a nationwide community-based voluntary health organization dedicated to
eliminating cancer as a major health problem, and
ACS CAN is a nonprofit nonpartisan advocacy
affiliate of the Society. We appreciate the
opportunity to participate in this Listening
Session, and our remarks address the three topics
on which we've been asked to comment.

The process for selecting the Advisory
Committee; the Society and ACS CAN support the
existing process for selecting the DGAC. As a
Federal Advisory Committee, the 2015 DGAC
operated in accordance with the Federal Advisory
Committee Act including being governed by a
charter, holding open meetings, and providing
multiple opportunities for members of the public
to provide comments. We agree that committee
membership included "individuals with current
scientific knowledge in the field of human
nutrition and chronic disease," including
expertise in a number of specific specialty areas
as mandated by the 2015 DGAC charter.

Members of the committee were jointly
appointed by the Secretaries of HHS and USDA
following a public call for nominations. It is important for committee members to be as unbiased as possible. We believe that the existing DGAC selection process is sufficient to insure that the committee's recommendations are an unbiased reflection of the current scientific evidence.

The 2015 DGAC charter designated committee members as "special government employees," meaning that unless a waiver was granted, the committee members had to be free of professional and personal financial conflicts of interest. This process is consistent with the selection process for other federal advisory committees.

We believe the committee members should and have previously possessed a range of expertise. The DGAC's conclusions and recommendations should be based on an examination of the existing science and not the committee members' opinions. To that end, the committee members should continue to represent a range of expertise and not a "range of viewpoints."
We also believe it is appropriate to exclude food and beverage industry representatives from the Advisory Committee, and any other individuals with a financial interest in the recommendations of the DGAC or the Dietary Guidelines. Industry groups like other members of the public have an opportunity to share their perspectives with the committee through the public comment process.

Methods to review the scientific evidence; we also believe the committee's methods to review this scientific evidence are appropriate, including the use of systematic reviews and dietary analyses. Systematic reviews consider the results from multiple studies on a single topic and are standard practice in the medical field. We believe the committee should rely even more heavily on existing health quality reviews and reports.

For example, the American Institute for Cancer Research and the World Cancer Research Fund have published comprehensive reports on the
link between food, nutrition, physical activity and at least 10 types of cancer. The committee should use these existing systematic reviews instead of recreating them and focus its reviews on supplemental and newer research.

How the Dietary Guidelines can prevent chronic disease; the Dietary Guidelines are the cornerstone of federal food and nutrition policies and programs and are already intended to help Americans eat a healthy diet to reduce their risk of chronic disease.

The Guidelines could further help to prevent chronic disease in a couple of key ways. The Guidelines should more strongly focus its recommendations on ways to prevent the leading diet-related chronic diseases, including cancer. Cancer is the second leading cause of death in the U.S., and a full 20 percent of nearly 1.7 million cancer cases expected to occur this year will be caused by excess weight, poor diet, excess alcohol intake, and physical inactivity. We were pleased that the 2015 DGAC examined the
relationship between diet and the most common
types of cancer; however, some of their
recommendations ultimately were not included in
the Dietary Guidelines.

The Dietary Guidelines could better
help Americans make changes in their diets by
recommending specific individual behavior changes
and clear policy system and environmental change
recommendations that help people make healthier
choices. Increased efforts are also needed by all
stakeholders to put these recommendations in
place across America.

In summary, we believe the DGAC and
the Dietary Guidelines development processes are
sound. By relying fully on the DGAC's evidence-
based recommendations and better helping
Americans follow the Guidelines, future editions
of the Dietary Guidelines can help Americans eat
a health diet that will reduce their risk of
chronic disease and promote lifelong health.

Thank you.

MS. ROMERO: Thank you very much.
MS. HARTMAN: Hi, my name is Christina Hartman, and I'm here today representing the American College of Cardiology. The American College of Cardiology, or ACC, appreciates the opportunity to provide comment to USDA on the development of the 2020 Dietary Guidelines for Americans. We will also submit today even more comprehensive written remarks.

Despite great progress, cardiovascular disease remains the leading cause of mortality and morbidity in the United States, as well as globally. Cardiovascular disease accounts for more than 787,000 deaths each year in the United States, and more than 30 percent of annual U.S. Medicare expenditures, and 17 percent of overall national health care costs. Related medical costs are expected to triple by 2030 to over $800 billion annually.

The 2020 Dietary Guidelines for Americans will play an important role in preventing cardiovascular and other chronic diseases. Americans, and increasingly more of the
world consume diets and make lifestyle choices that lead to heart disease. Obesity and the related risk factor of poor diet and nutrition are strongly associated with multiple cardiovascular disease risk factors. The epidemic of obesity in the United States represents a significant and serious threat to the health of Americans.

One of the greatest challenges in improving diet and nutrition in America is not only insuring clear guidance is issued in the 2020 Dietary Guidelines, it is also insuring the appropriate message is communicated through the media.

The ACC was pleased to see the 2015 Dietary Guidelines emphasized that people do not need to obtain cholesterol through diet and should eat as little cholesterol as possible. The 2015 Dietary Guidelines cautions about cholesterol intake including a clear statement that people do not need to obtain cholesterol through food and should limit their intake, are
very important to our members who see the results of poor diets every day when treating cardiovascular disease.

The ACC was, however, very concerned about the misinterpretation of this cholesterol advice by the press, which rather than communicating the importance of limiting cholesterol in the diet, led with a message that the government had dropped its warning about avoiding cholesterol.

With confusing and often conflicting information in the media and promoted by specific interests, it is more important than ever that Americans have a clear source of science-based information about diet. We would like to see the 2020 Dietary Guidelines continue to provide Americans with science-based guidelines, emphasizing a diet of more unprocessed foods, especially fruits, vegetables, and whole grains.

ACC is committed to playing a role in supporting healthy dietary patterns. With respect to the selection and composition of the next
Dietary Guidelines Advisory Committee, the ACC would like to see a balance of experts from the nutrition, science, medical, and public health fields. We believe the presence of an expert in cardiovascular disease, America's number one killer, is critical. This person should have extensive knowledge of a variety of heart-healthy dietary patterns in order to provoke a comprehensive discussion of available and appropriate options. We also believe the Advisory Committee should be composed of individuals free from commercial conflicts of interest.

The methodology that underpins the development of the 2020 Dietary Guidelines should continue to align with the methods used by the experts of ACC and our colleagues at the American Heart Association when developing our joint guidelines for clinicians, including our recently issued Lifestyle Guidelines.

Our methodology is inspired and informed by the Institute of Medicine's Standards for the Development of Methodologically Robust
Clinical Practice Guidelines based on sound systematic evidence review. This approach insures that recommendations are "unbiased, scientifically valid and trustworthy," and that guideline development is driven by rigorous scientific review and analysis of the evidence, not just the most recent study or headline.

The recent attempt to eliminate consideration of any evidence not graded as strong when pulling together the 2015 Dietary Guidelines was a mistake that should not be repeated in 2020. Thank you for the opportunity to comment.

MS. ROMERO: Thank you.

MS. VAFIADIS: Thank you for the opportunity to present the views of the American Heart Association. I'm Dorothea Vafiadis, and I'm the American Heart Association's National Director of Healthy Living.

Before joining AHA, I was on staff at USDA's CNPP where I had the privilege of serving on the 2005 Dietary Guidelines Management Team.
So I have had the opportunity to participate in the guidelines development process as both an Agency staff member, as well as an external stakeholder.

That experience allows me to address some of the recent controversy over the development of the scientific report of the 2015 Dietary Guidelines. And I can confidently say that the process used to develop the Advisory Committee Report is strong and integrates a robust systematic review.

The Advisory Committee's recommendations are developed according to rigorous scientific standards, standards that are similar to those used by AHA in the development of our guidelines and recommendations. But I must point out that while we feel the process used to develop the Advisory Committee Report is strong and transparent, the process used to translate the Committee's recommendations into the final Dietary Guidelines is less clear, and that is one of the areas that we'd encourage the Institute of
Medicine to address in its report and offer recommendations.

We believe that the IOM's review will conclude that large comprehensive changes to the development process are not needed. However, there are a number of important recommendations the IOM should consider making in its report.

First, there should be some consideration given to the databases that serve as the foundation for the dietary patterns and an exploration of whether current dietary patterns are prioritized over recommended patterns.

Second, the Dietary Reference Intakes need to be updated. The Dietary Guidelines are dependent on the DRIs but the DRIs are outdated, some are almost 20 years old. Updating the DRIs including the model, the applications and dietary assessment, and planning should be a priority before the next edition of the Dietary Guidelines is developed. To facilitate and update the DRIs, the IOM should call on Congress to create a dedicated funding stream.
Third, and I cannot emphasize this enough, future editions of the Dietary Guidelines need to go beyond advising people what to eat and focus more on how to achieve behavior change to improve the eating habits of Americans. Future guidelines, not just the Advisory Committee Report, must emphasize the critical role of the food environment and public policies which can impair or empower Americans' ability to follow the guidelines.

Future Advisory Committees could place more emphasis on examining policy approaches to change dietary patterns on a broad scale. This could include public education campaigns, access to healthy foods in work places, schools, and restaurants, application of behavioral economics, voluntary industry initiatives, and exploring the role of taxes. Those recommendations with evidence-based support should be carried over into the Dietary Guidelines for Americans policy document. The guidelines could also encourage the formation of public/private partnerships to work
toward a healthier food environment.

Fourth, to increase the relevancy of the Guidelines to all Americans, the next edition of the Guidelines should feature culturally-specific dietary patterns such as Asian and Hispanic cuisines to better reflect our multicultural society.

Fifth, the Advisory Committee's report provides the agencies with a strong science-based foundation for the Dietary Guidelines. However, not all these recommendations are incorporated into the final Dietary Guidelines. When the agencies decide not to adopt an Advisory Committee's recommendation, a rationale should be provided. This would further increase transparency to the process used to translate the Advisory Committee's report into the Dietary Guidelines.

I will close by reiterating our support for the 2015 Advisory Committee's Scientific Report. It integrates a robust systematic review. To insure that future
Committee reports maintain this high standard, we recommend enhancing the process with a dedicated source of public funding to update the DRI.s and an ongoing synthesis of the robust emerging science, especially in the areas of recommended dietary patterns, behavior change, and implementation. This process must also be open and transparent and avoid special agendas. This will result in a continuation of the high standards we've come to expect from the Dietary Guidelines, and elevate future Guidelines to an even greater quality. Thank you for this opportunity.

MS. ROMERO: Thank you.
Sarah Ohlhorst.

MS. OHLHORST: Thank you. I'm Sarah Ohlhorst representing the American Society for Nutrition. ASN appreciates the opportunity to comment on the process of developing future editions of the Dietary Guidelines for Americans. ASN is a scientific professional society with more than 5,000 members who conduct nutrition
research to help all individuals live healthier lives.

ASN supports the continued use of a strong evidence-based approach to inform the development of future editions of the Dietary Guidelines for Americans as the process evolves and expands. Insuring the quality of the DGAs requires careful review of all high-quality studies on key topics based on publicly available transparent standards for evidence-based evaluation.

Achievement of such a high quality of evidence requires continued investment in nutrition research that promotes the health of all Americans. This peer reviewed scientific evidence provides the fundamental basis for the DGA.

ASN continues to support the use of the Nutrition Evidence Library. That's a tool for validation of dietary guidance through multiple peer reviewed sources.

ASN supports expanding the DGA process
to provide unified dietary guidance across the entire life span. To support the inclusion of infants and children birth to 24 months, and future editions of the DGAs, the literature review should be enhanced to include the extensive work of the government-led B-24 Project to determine the evidence-base.

ASN encourages the government to begin to address the research recommendations outlined in the B-24 Project now. The government may consider over-sampling particular sub-populations including birth to 24 months to better inform future editions of the DGA through the National Health and Nutrition Examination Survey. The government may also wish to consider additional ways to make the NHANES data collection more current and specific to continually assess the population's health.

Additionally, ASN strongly urges the government to begin regular updates of the Dietary Reference Intakes, the DRIs, to provide current accurate data with which to identify
nutrients of public health concern and other
nutrient needs to be used in the development of
the DGA. Chronic disease prevention should
continue to be a focus of future DGAs. The
government may wish to consider nutritional
biomarkers for chronic disease endpoints, and how
DRI development may begin incorporating diet-
related current disease endpoints when developing
dietary recommendations that address health and
disease. However, the development of
recommendations should not be hindered or delayed
by the process of discovery and validation of
nutritional biomarkers for diet-related disease
risk. The DGAs should expand the use of nutrient
status as the basis for recommendations related
to sufficiency.

With regard to process, the Dietary
Guidelines Advisory Committee should be assigned
a clear scope of work, and be given the
flexibility and necessary tools to address new
and emerging topics of importance to dietary
guidance. Consistency between the evidence-base
and any areas of expanded scope should be assured.

Membership on the DGAC should be expanded as the process expands to include additional nutrition science-related experts including experts on behavior change, pair conception, pregnancy through 24 months of age, as well as food science and other expertise. This will also require consideration of the best approach and configuration of expertise to achieve a broader focus.

For example, part of the process of the DGAs could be an overarching Committee of experts to draw upon even greater expertise from the nutrition science community. Subcommittee experts, reviewers, and consultants should be selected using the same rigorous selection process as for DGAC members.

More emphasis on implementing the DGAs and moving Americans toward DGA compliance is also needed. ASN recommends that the government continue to engage collaborators to insure the
DGAs are disseminated to the public, communicated clearly, and will support improved public health outcome. Thank you.

MS. ROMERO: Thank you.

Mr. Jacobson.

MR. JACOBSON: Thank you. Good morning. I'm Michael Jacobson from the Center for Science in the Public Interest. Thank you for the opportunity to comment on the Dietary Guidelines for Americans, and the process by which it has been produced.

The Guidelines is a critical public health document that establishes nutrition standards for government programs benefitting millions of Americans, and creates a strong science-based foundation for nutrition advice and education. The Guidelines were never intended to prescribe advice to people with specific illnesses, genetic backgrounds, or uncommon metabolic factors. Instead, it serves as population-level advice on public health.

To better prevent chronic diseases and
insure nutritional sufficiency, the Guidelines should offer clear and understandable advice about which foods, not just nutrients, people should eat more of or less of, but it's tough to eat a healthful diet when as The Lancet editorialized last month, "Companies with a vested interest to provide ultra-processed energy dense nutrient poor food as cheaply as possible," are marketing super-sized portions of sugar drinks, burgers, pizzas, and other unhealthy foods. Hence, future Guidelines should not only provide dietary recommendations, but should also recommend state, local, and federal policy changes such as a soda tax, or limits on sodium in packaged and restaurant foods to help counter the food industry's influence and actually improve the public's health.

The Committee also should acknowledge that social and economic inequities affect what people eat. In a presentation to the DGAC in 2014, Dr. Michael McGinnis, the Executive Secretary of the NAM, referred to "social,
geographic, racial, and ethnic disparities," as a challenge to the Guidelines' impact. Future Guidelines should recommend measures to help overcome the impediments that vulnerable subgroups face when trying to eat healthy diets.

As for the process used to produce the Guidelines, it is crystal clear that the DGA process was transparent and its members were well qualified. And I say that, although I disagree with parts of the report.

As detailed in the public record, the DGAC employed a systematic predetermined framework, including the use of the NEL to guide its work. That eliminated bias to the greatest extent possible, while still leaving room for judgment. The meetings of the DGAC and its Subcommittees were open to the public and the public, including industry, had numerous opportunities to comment on tentative conclusions and then the final report.

One improvement in the process would be for the NAM to recommend that USDA and HHS
disclose potential conflicts of interest of
candidates for the DGAC. Another would be to
expand the Committee by including experts on such
topics as toxicology and the environment.

Finally, we should be candid about the
cause of the brouhaha that led Congress to
commission the NAM report. The meat industry and
others launched a major lobbying campaign to
discredit the DGAC report because they didn't
like the science-based advice to eat less red and
processed meat. Their campaign included false and
unsubstantiated claims about the DGAC's review of
the evidence and the strength of the evidence
itself. In fact, though, the DGA's procedures
were scientifically sound and its conclusions
were consistent with those of the World Health
Organization and other authorities.

In conclusion, I hope that the NAM
report will thoroughly vindicate the efforts of
the members of the DGAC who served the country
well. In the future, though, highly qualified
individuals may be reluctant to so generously
donate a great deal of their time if their only compensation is unjustified attacks on their credibility and findings. Thank you.

    MS. ROMERO: Thank you, Mr. Jacobson.

    Ms. Klein.

    MS. KLEIN: Good morning. My name is Becca Klein. I'm here on behalf of Friends of the Earth, a nonprofit organization with over 650,000 supporters that fights for a healthier, more just, and sustainable world. Thank you for the opportunity to offer our perspective today. We will also be submitting more comprehensive comments in writing.

    To start, we want to highlight what has been working well. We believe that the overall process for gathering and synthesizing scientific evidence to inform the 2015-2020 Dietary Guidelines was nearly flawless. The methods used by the Dietary Guidelines Advisory Committee to review the scientific evidence were rigorous and fully appropriate to the task at hand. We commend USDA and HHS for encouraging a
transparent process of scientific inquiry,
including at least six publicly televised
Committee hearings. We, therefore, urge only a
few changes with regard to the Advisory Committee
and its transparent process for reviewing,
evaluating, and deliberating on the latest
scientific findings.

What does need to change, however, is
interference by Congress and the food industry
that prevented USDA and HHS from publishing
guidance that fully and clearly reflected the
science and the unanimous recommendations of the
Advisory Committee, particularly in regard to the
need for Americans to consume less meat and more
plant-based foods for their health and America's
long-term food security.

More transparency is needed for the
public to understand why key consensus
recommendations from a highly esteemed scientific
body were ignored in the final Dietary
Guidelines, particularly when these science-based
recommendations were supported by more than
21,000 public comments, 200,000 public petitions, 700 health professionals, and hundreds of mayors. While such a public opinion should not drive the contents of the Dietary Guidelines, it should have bolstered USDA and HHS' resolve to publish dietary guidance that fully aligned with the evidence-based conclusions of the Advisory Committee.

Unfortunately, the only conclusion one can draw from this failure to incorporate the overwhelming science on the health benefits of meat reduction is that Congress and profit-driven food industry interests interfered in a way that prevented the final Guidelines from fully reflecting the weight of the scientific evidence. Experts from leading public health organizations, including the World Health Organization, the American Heart Association, and the American Cancer Society, and hundreds of scientific studies confirm that people need to eat less meat, particularly red and processed meat for better health; yet, the only
recommendation to reduce meat consumption was
buried deep in the final report, and only applied
to teenage boys and men with no overall specific
recommendation on eating less red and processed
meat.

For the sake of American's health and
our country's ability to produce nutritious food
into the future, aspects of this process must
change, and we offer the following
recommendations.

The 2015 Advisory Committee was
comprised of experts with integrity and with
utmost regard for the scientific process. The
future selection process for the Advisory
Committee similarly should insure the appointment
of independent academics and experts who have no
conflicts of interest especially in terms of ties
to the food industry.

In addition, we would recommend the
inclusion of Committee members who have expertise
in food production sustainability as it relates
to long-term nutritional sufficiency, as well as
human and environmental health. It is impossible to discuss what Americans should be eating without taking into account the impact of food production on public health and future food security. That is why it is especially unfortunate that Secretaries Burwell and Vilsack ignored the weight of the evidence and decided that consideration of sustainability issues was outside of the scope of the Dietary Guidelines.

Other analyses, particularly the one authored by former USDA Deputy Secretary Kathleen Merrigan and colleagues in the peer reviewed Journal of Science clearly shows that it is entirely appropriate and even necessary to include dietary guidance on food production methods and their impact on future food security and sufficiency.

In conclusion, what clearly needs to change is Congressional and industry interference with the agency's ability to produce a document that reflects the careful objective evidence-based work of the Committee and the preponderance
of the global scientific evidence. We hope the IOM will confirm the soundness of the current Dietary Guidelines Advisory Committee process and focus much of its review on how to enhance the ability of USDA and HHS to publish Dietary Guidelines that fully and clearly reflect the weight of the scientific evidence, as opposed to political or profit-driven food industry interests.

Thank you for your time, and again thank you for the opportunity to share our perspective on this.

MS. ROMERO: Thank you.

Ms. Mohamedshah.

MS. MOHAMEDSHAH: Good morning. I'm Farida Mohamedshah, Director of Food Health and Nutrition at the Institute of Food Technologists. Founded in 1939, the Institute of Food Technologists is committed to advancing the science of food. Our nonprofit scientific society, more than 17,000 members from more than 95 countries brings together food scientists,
technologists, and related professionals from academia, government, and industry. IFT appreciates the invitation to provide comments pertinent to the process of developing future editions of the Dietary Guidelines for Americans. Our comments relate to the selection of the Dietary Guidelines Advisory Committee, or DGAC, specifically the inclusion of food scientists and technologists in the DGAC.

IFT believes that food science and technology play an integral role in the development and implementation of the Guidelines. We are disappointed that 2015 DGAC did not include food scientists and technologists; however, IFT appreciated the opportunity to present to the 2015 DGAC on the implications related to past, current, and anticipated changes to food formulation, in particular for sodium, added sugars, and fatty acids.

Moving forward, we urge the Departments of Agriculture and Health and Human Services to insure that at least one food
scientist or technologist is included in the
development of future editions of the Dietary
Guidelines.

Regardless of the focus of the
Guidelines whether it be eating patterns, food
groups, individual components, or nutrients and
foods, we believe that it is important to
consider the advances in our food system made
through food science and technology. Food science
and technology have and will continue to play an
integral role in delivering safe, nutritious,
accessible, affordable, and palatable foods.

Food science enhances our ability to
deliver nutrients via foods. Integration of food
science and technology and nutrition along with
collaboration amongst these two disciplines is
important to improve the availability and
nutritive quality of foods.

Importantly, through food science and
technology we have been able to decrease sodium,
saturated fats, trans fat, and sugars and address
many of the shortfall nutrients such as calcium,
dietary fiber, and magnesium in the food supply as noted in the Dietary Guidelines for Americans.

Food scientists and technologists provide support to a dynamic and rapidly changing food environment through product reformulation, fortification, and enrichment, for example. It is crucial that the dietary recommendations are not only evidence-based but practical, realistic, and achievable by all consumers, including the vulnerable groups.

During the development of future Dietary Guidelines discussions related to changes in the food supply can only be addressed by food scientists and technologists. Critical insights from these professionals can make significant contributions towards the development of dietary recommendations, consumer behavior, and health of Americans.

More specifically, they can provide valuable insights into existing technological capabilities and limitations germane to the food supply and its impact on food manufacturing and
food safety, sensory appeal of food, costs and
time constraints, and consumer acceptance. Their
efforts continue to address innovations related
to nutrition challenges, food safety, sensory
appeal, and other aspects of the food supply
chain.

An integrated approach to health is
critical. IFT strongly urges the agencies that as
they plan the process for selecting the DGAC for
future editions of the Dietary Guidelines
considerations be given to mandating
representation from various disciplines,
including food science and technology.

Expertise from food scientists and
technologists, nutritionists, medical
professionals and many other professions will
lead to evidence-based Dietary Guidelines that
are implementable along with the development and
availability of more nutrient dense and
affordable food choices.

The Dietary Guidelines is a foundation
for many federal, state, and local food and
nutrition programs, public health interventions, and new production formulations and reformulation; therefore, IFT also recommends that the USDA continue to insure that the future DGAC's recommendations are supported by the best scientific evidence available at the time.

IFT and our members are committed to assisting with the future Dietary Guidelines process. We believe our technological and scientific capabilities will continue to be of value in the development of Dietary Guidelines and for improved food choices for all Americans.

Once again, IFT strongly urges the Departments of Agriculture and Health and Human Services to insure that food scientists and technologists are part of the DGAC in the future.

Thank you for the opportunity to comment.

MS. ROMERO: Thank you.

Mr. Hentges.

DR. HENTGES: Thank you. I'm Eric Hentges, and my disclosure is that I am the former Executive Director of CNPP for the 2005
Dietary Guidelines and initiated the evidence-based review process, so I am vested in the future of the Dietary Guidelines.

ILSI is a nonprofit research group where there are 17 ILSI branches around the globe, and we operate on what we call a tripartite philosophy where we believe that if government scientists, industry scientists, and academic scientists are all putting emphasis together you're more likely to find solutions in the future.

One of the things that we focus on is the research quality, and so I would say that the primary emphasis for the Agency and for IOM moving forward for process developing future editions of the Guidelines is to focus mainly on the best and most appropriate methodology for compiling scientific data to formulate scientific consensus statements, and this includes transparency. There is transparency but it can never be dropped in the methodology. It has to -- it's paramount in moving forward, and also
equal access of all stakeholder sectors into the process. And this includes prioritization of the research questions, as well as the examination of these questions within a consistent analytical framework.

Systematic reviews, I am a big fan of it and I think it has been used well. However, evidence-based reviews include not only the development of a science-based recommendation and Guidelines, but also the setting of research agendas, the foundation for updating as new data emerges, and formulating scientific consensus statements. Thus, there are many sectors within the food and nutrition research community that have a critical and vital interest in how this is done, so it questions whether the isolation of the systematic review system within CNPP is appropriate, or whether it should be in the greater food and nutrition research aspects of USDA in the future.

The establishment of an expert panel is part of systematic reviews, an integral part.
However, if the methodology provides a robust body of science that has been adequately developed by the process taking into account transparency as well as prioritization of the research question then do you need a panel for one to two years, or should this panel be able to do its work looking at this body of work developed by the appropriate scientific gathering process within days, as opposed to years?

In addition to evidence-based review, I believe that the Agency should look at the methodology that supports big data analysis moving into the future. This is especially true if the focus is going to be on dietary patterns, I would rather say dietary landscape beyond just patterns, and I believe that this open prioritization of questions is also a necessary piece for establishing the architecture that would be used to compile the data set needed for establishing a big data approach here. And I believe that you could look at the example of what Economic Research Service has done in a
smaller focus with their FoodAPS Program to
support the SNAP Program. So, thank you very
much.

MS. ROMERO: Okay, Ms. Scarmo.

DR. SCARMO: Hi, I'm Stephanie Scarmo
from the Pew Charitable Trusts. Thank you for
having us. We will not be providing oral comments
today.

MS. ROMERO: Following today's sessions
the unedited transcript is going to be given to
the IOM prior to their beginning of the review of
the comprehensive study of the Dietary Guidelines
and the development process. USDA encourages you
to stay in contact with the IOM once it begins
the study. So as you exit the Williamsburg Room,
this room that we're in here, make sure that you
have --- if you have comments you have to drop
off your articles with Susan, and then please
stop by the security desk to return your badge as
you're leaving. Thank you very much for
participating.

(Whereupon, the above-entitled matter
went off the record at 10:52 a.m. and resumed at 1:00 p.m.)

MS. ROMERO: Okay, let's go ahead and get started. On behalf of USDA, I want to thank you for participating in this Listening Session. USDA appreciates your insights as a leading organization interested in the Dietary Guidelines for Americans.

My name is Kathy Romero, and I'm your Facilitator for today. Our host is USDA Center for Nutrition, Policy, and Promotion and listening in we have the CNPP Executive Director, Angela Tagtow, and Deputy Director, Jackie Haven.

The purpose of this session is to get comments from leading member-based organizations like yours, and to get the greatest diversity of perspectives on the process for developing future editions of the Dietary Guidelines.

In addition to considering your member-base, USDA also considered other factors, including representation across health and nutrition sciences, the level of engagement
during the 2015 to 2020 Dietary Guidelines development process, and representation of the diversity across the food and beverage categories.

There are three Listening Sessions being held and include representation from professional health organizations and consumer advocacy groups, trade organizations, and other federal agencies.

Your remarks will be recorded and shared verbatim with the Institute of Medicine Food and Nutrition Board prior to their initiation of a comprehensive study of the development process of the Dietary Guidelines. This was a directive outlined in the FY 2016 Consolidated Appropriations Act.

Today your remarks may address how the Dietary Guidelines can prevent chronic disease, insure nutritional sufficiency for all Americans, and accommodate a range of individual factors including age, sex, and metabolic health. Your remarks may address processes for selecting the
Advisory Committee, methods used to review scientific evidence, processes for developing the Dietary Guidelines across a life span. And this is actually per the 2014 Agriculture Act which states that the 2020 edition of the Dietary Guidelines will expand to include nutrition guidance for infants and toddlers birth to 24 months, and women who are pregnant.

We have a few housekeeping notes. The first is, I want you to admire this beautiful table that you're sitting at. It's a 36 by 12 mahogany and leather table and it was built in this room specifically for the Summit of Industrial Nations. It was held here in the Williamsburg Room in May of 1983 and hosted by President Reagan. And we have -- no food or beverage are allowed in the room because we want to make sure that we maintain this historical treasure.

Your remarks, you have the opportunity to provide up to five minutes of oral remarks at this Listening Session. And again, all your
remarks are going to be recorded, and that's what
the machines are on the table. At the beginning
of your remarks please clearly state your name
and the organization, and make sure that the
button on your mic is green so that the recorder
can hear everything.

Timekeepers are available, the ladies
here, and they're going to hold up a card and
indicate when you have one minute, 30 seconds,
and then when your time is up. Please respect the
five-minute time limit so that we insure that
everyone gets that time. And I will be firm on
that five-minute timeline, but you do have the
opportunity to provide your written remarks and
drop them as you're leaving. If say you don't get
through everything, you can drop those remarks at
the desk on your way out and those will be
incorporated into the notes so it's not like it
won't get included.

To reiterate, this is a Listening
Session. This is an opportunity for USDA to hear
your perspective on the Dietary Guideline
development process. We're going to go in alphabetical order by name of the organization with one exception. We do have someone that has to leave us early and so she's asked if she can go first, so we will accommodate that.

Following today's session, USDA is going to provide an unedited transcript to the IOM, and this preliminary assessment is not meant to override the IOM's plan to gather its own insights from stakeholders, which USDA anticipates they're going to do as part of their independent study.

So let's go ahead and get started, and Ms. Wilcox, you can go ahead, and your time starts now.

MS. WILCOX: Good afternoon. I'm Kristin Pearson Wilcox. I'm Vice President of Government Relations for the International Bottled Water Association, and thank you again. Our members include those companies that produce all kinds of water. Sugar is not included in our products. We represent those that make spring,
sparkling, mineral, artesian, and purified bottled water, and water plays a vital role in supporting nutritional health.

Bottled water producers are strong supporters of the First Lady's Drink Up Initiative, and we appreciate that based on the 2015 Dietary Guidelines, MyPlate, MyWin Nutrition Guide, that it encourages Americans to drink water instead of sugary beverages.

Our recommendations on how future Dietary Guidelines processes should be conducted is based on four pillars of advice. Number one, to be clear about your intentions up front. Number two, fight misinformation about your conclusions when they arise. Number three, include all relevant and as much science as you can in your evaluations. And number four, be transparent. These pillars should be based on the foundational goal of focusing your advice on how to promote good behavior.

Let's look at this as it relates to the debate over added sugar. In order to be
transparent from the start and clear with the intentions we would recommend that the process for preparing the 2020 Guidelines and any future Guidelines include water and beverages as a topic for discussion by the Advisory Committee. Looking at water will allow the nation's best scientists and nutritional experts to consider all the relevant research on how water and beverages impact healthy hydration among all ages and populations.

If we're going to look at how best to fight chronic disease we need to look at food, beverages, and lifestyle. Moving forward the process should continue to include all available science. Studies have shown that drinking plain water instead of sugar sweetened beverages is associated with decreasing incidences of obesity, Type 2 diabetes and cardiovascular disease.

People of all ages need to maintain proper hydration to function optimally; however, for example, much of the research submitted by IBWA and our comments in 2015 Guidelines appear not to
have been included. This leaves questions about what science was left unexamined. Further DGA efforts should not ignore where there is consensus in the scientific community.

We recommend you be clear with your intentions and transparent in your process, and to let other policy objectives that may creep in be dismissed immediately. So, for example, if the focus is reducing sugar intake the next Dietary Guidelines should place a greater emphasis on what people drink and encourage Americans to reach for water instead of less healthy beverages.

The 2020 Guidelines and future Guidelines need to be aware of people's habits and acknowledge that convenience and availability are key to getting people to change their ways.

The process needs to fight misinformation as soon as it arises and be aware that the DGAs is where science meets policy, and that impacts what people think about what they eat and drink. It impacts sales and what people
do with their daily lives. So, for example, if
you talk about reducing sugar intake, the
question might not be how do we reduce sugar
intake but how do we get people to drink more
water? It's important that bottle water, for
example, is an avenue for people to get to water
because 47 percent of added sugar in our diets
comes from beverages, and beverages make up 20
percent of our daily calorie intake. It's clear
that Americans need guidance on beverages if
reducing sugar intake would be a focus in the
future.

We can't stress enough the importance
of being transparent and focusing on good
behavior. Adults and children alike, I know this
as a mother, don't like to be told don't eat
that, or don't do this. The 2015 Guidelines took
a great step forward in recognizing that
Americans need realistic, obtainable, incremental
advice on how to improve their diets. And because
water needs to be -- and so in 2020 the DGAs need
to focus on and will focus on children from birth
to 24 months, and also pregnant women, we think water is a good focus.

There is an increased risk of developing chronic diseases that start at any early age, and so do good eating habits, good exercise habits, and good drinking habits.

NHAYNES IV data shows that children in New York and Los Angeles, for example, don't get the adequate hydration they need before they go to school. Water accounts for only 29 percent of children's total intake, and children four to eight, 75 percent of them fail to satisfy their DRI recommendations for water.

So, in conclusion, the role of food, and beverages, and lifestyle need to be considered; what people eat, what they drink, what they do. We need to look at the whole package and that needs to be based on a foundation of good behavior and promoting good habits.

The 2020 DGA is -- all future DGA efforts should do this by focusing on the four
pillars of advice; be transparent, include all science, fight misinformation, focus on good behavior, and be clear with their intention.

Thank you.

MS. ROMERO: Thank you.

Okay, Ms. Sanders.

MS. SANDERS: Good afternoon. I'm Lee Sanders, Senior Vice President, Government Relations and Public Affairs for the American Bakers Association. Thank you for the opportunity to provide stakeholder comments to USDA CNPP on the process for developing future editions of the Dietary Guidelines for Americans. My comments today provide feedback not only for the American Bakers Association but for the members of the Grain Chain, a grain industry coalition representing farm to table.

With regard to how the Dietary Guidelines can prevent chronic disease and insure nutritional sufficiency for all Americans and accommodate a range of individual factors including age, sex, and metabolic health. During
the 2015 review process, the Advisory Committee was primarily comprised of public health experts. While those experts provided value, moving forward it will be critical to also include highly credentialed practicing registered dieticians, food scientists and other clinical experts that understand not only the complex individual factors impacting food choices, but also the regulatory process to best determine the impact the DGA recommendations will have on the public.

To more effectively develop nutrition messages that will resonate with the public, including low income consumers, special expertise is needed. This includes highly credentialed practicing registered dieticians who have practical hands on experience working with clients. This science expertise is needed to insure recommendations can be applied in a variety of typical settings including home cooking, restaurant food selection, and school meal plan development.
The DGAC must stay within its scope of practice which is nutritional recommendations. This scope needs to be clearly communicated to the Committee before it commences its work. The DGA recommendations should be based on a balance of nutrients.

Over the last couple of cycles of the DGAC reviews there's been movement away from dialogue on nutrients. This movement is not beneficial to public health. We believe that a review of nutrients and emerging science in this area is crucial to any future DGAC review and assists in directing nutritional sufficiency for all Americans with a range of individual factors.

Additionally, the ABA and Grain Chain believe that it is critical for future DGAC members to have an educated appreciated of the importance of Enrichment and Fortification. Enrichment was enacted in 1941 when servicemen and women were found to be under-nourished. This single health initiative virtually eliminated pellagra and beriberi in the U.S. The success of
this initiative resulted in enriched grains being
chosen as a vehicle for folic acid fortification
to help prevent neural tube birth defects. NTDs
have dramatically decreased in the last decade
since enactment and folic acid fortification is
one of the CDC's top public health achievements
in the last decade.

Little attention was given to cereal
fiber in the 2015 review despite grain foods
contributing vital and often under-consumed
nutrients to the American diet, including 43.7
percent of all fiber. Approximately two-thirds of
grain contribution to total fiber intake comes
from enriched grains. The contribution of whole
and enriched grains to total fiber intake are
important because more than 90 percent of adults
and children fall short of dietary fiber
recommendations.

With regards to processes for
selecting the Advisory Committee, we believe it's
important for NAM to review the current Advisory
Committee selection process and structure itself
is adequate for future DGA reviews, especially
given the growing list of questions that it's
expected to address.

    It will also be important to insure
that the selection process is fully transparent.
To streamline the process, the Agency should
develop and finalize questions the Advisory
Committee will address prior to the nomination
process so that the nominations can be targeted
to the appropriate expertise. We believe an
Advisory Committee with diversified knowledge and
expertise is needed, including in such areas as
food science, nutrition, regulatory, food supply
chain, and human behavior.

    Committee members should be selected
from a variety of environments such as
universities, industry, and research settings, as
well as those who work directly with consumers.
We urge the agencies and NAM to explore a 10-year
standing committee with broad expertise in the
areas of carbohydrates, protein, fat, sugars, and
sodium that can review emerging science for each
macronutrient. The standing committee could assist the Agency in developing the overall list of questions and then prioritize those questions for the five-year DGAC Committee to address. This approach organizes the five-year process so it is more efficient and focused.

More linkage to Dietary Reference Intakes is needed. It would be beneficial for the Advisory Committee to have more interaction with the IOM's Food and Nutrition Board to maximize the efficiency of limited government resources.

With the 2020 edition of the new set of recommendations from birth to two years old, the Grain Chain believes a dedicated Committee is needed comprised of pediatricians, life cycle nutritionists with practical experience, pediatric allergists, and pediatric feeding issue experts. Furthermore, some of the best expertise and research in this area is through industry. To discount this resource would potentially be damaging to those --

MS. ROMERO: Thank you.
Ms. Jack.

DR. JACK: Good afternoon. I am Dr. Maia Jack, Vice President of Science and Regulatory Affairs for the American Beverage Association. ABA represents the U.S. nonalcoholic beverage industry. We welcome the opportunity to share our thoughts.

The Dietary Guidelines provides nutrition guidance that assists all Americans to choose dietary patterns that not only meet individual nutrient needs but also promote health and reduce chronic disease risk, while allowing for food enjoyment. Narrowly focusing on any single nutrient, food, or beverage is unlikely to promote good dietary practices and instead may result in unintended consequences. The ideology of chronic diseases is multi-factorial and there is no silver bullet. To reach the intended goal of promoting balance, moderation, and a healthy diet and supported by science is key. An unbiased review of the totality of the evidence is imperative as it's placing more weight on
intervention studies that specifically look at dietary impact on health and well-being. Randomized controlled clinical studies are considered the gold standard in evidence-based.

The Guidelines chartered purpose to provide science-based nutritional advice must be its guiding principle. In that vein, the Agency should insure that the Guidelines stay true to its charter and not venture outside its intended scope, such as making policy recommendations that do not add to the discussion on science-based nutrition advice.

Likewise, addressing ingredient safety, FDA's responsibility is not about nutrition but rather requires an expert panel in toxicology. Yet another example would be the setting of DRIs, IOM's responsibility. The Dietary Guidelines should be objective, practical, and achievable in the real world across population groups.

The DGA Advisory Committee selection process is critical to the outcome, but first the
right questions should be identified. That is
scoping and problem formulation. Identifying key
research questions before an Advisory Committee
is empaneled will allow relevant qualified
experts to be nominated. A formal notice and
common practice meets this with this task.

Learning and leveraging best practices from other
credible groups such as IOM, EPA, and NTP will
provide insights on how to manage an open,
transparent, and public process relative to
scoping and problem formulation.

Once areas of potential inquiry have
been determined qualified cross-disciplinary
experts from government, industry, academia and
NGOs should be nominated to the Committee who
could not only review the evidence but also to
set relevant, meaningful, and balanced nutrition
science-based dietary recommendations. While each
qualified expert comes with inherent conflicts
and biases, it is their expertise that should
determine their qualifications. It is in
everyone's interest to promote public health and
reduce chronic disease risk.

Other methodological experts should be included on the Committee to enhance rigor of the evidence-based review process. These additional experts can insure that the totality of the evidence is considered and graded consistently, fairly, and objectively. They may also provide oversight by clarifying working parameters relative to the reviews and insuring relevant metrics are met. This will lead to a more rigorous and unbiased process and likely result in objective nutrition science-based dietary recommendations.

Implementation of a transparent process will insure integrity. Should there be a need for expert consultants after the Committee is established understanding how this applicants are vetted and identified and having access to their findings likewise lends more credibility to the robustness of the process.

Also, IOM should determine a more appropriate time frame for updates to the
Guidelines; perhaps 10 years in view of limited new scientific research in a five-year period. The NEL grading rubric used to assess the strength of the evidence should be applied consistently to all of the evidence considered, and the recommendations should consistently align with the strength of the evidence. Inconsistent application of criteria and of recommendations based on varying levels of evidence have previously been an issue.

In the last DGAC process while moderate evidence supported the benefits of low or no calorie sweeteners for short-term weight loss the Committee recommendation was to avoid low and no calorie sweeteners all together. In some instances recommendations were based on no evaluation of the evidence. IOM should be engaged in setting standards and criteria on how and when dietary recommendations may be made.

The selected Committee should be responsible for conducting de novo NEL evidence-based reviews either for a new research question
or to build on prior NEL reviews. Streamlining this process slowly by leveraging other organizations' reviews would move to the level of rigor necessary for consistent and objective nutrition science-based dietary recommendations.

Finally, the 1990 Nutrition Act instructs that the Dietary Guidelines be based on the preponderance of scientific and medical knowledge current at the time of publication. While the most recent Guidelines were published in 2016, the Committee last met in 2014 to finalize its recommendations based on scientific evidence no more current than September 2014. A mechanism to consider additional scientific studies published in the interim must exist prior to the Guidelines release to insure that the recommendations are not already out of date at time of publication. If a major finding potentially alters a recommendation before -- then IOM with the Agency should evaluate the strength of the evidence prior to releasing the final Guidelines.
Thank you for your consideration and we've submitted written comments, as well.

MS. ROMERO: Thank you. Remember to turn your mic to green if you're speaking.

Mr. Gummalla.

DR. GUMMALLA: Thank you, and good afternoon. My name is Sanjay Gummalla. I'm the Vice President of Regulatory and Technical Affairs at the American Frozen Food Institute. The American Frozen Food Institute or AFFI thanks the Center for Nutrition, Policy, and Promotion for the opportunity to comment on the Dietary Guidelines for Americans, or DGA, and its process.

AFFI is the voice of the frozen food community and at the National Trade Association it represents frozen food manufacturers and distributors throughout the United States.

First, AFFI commends the U.S. Department of Agriculture and the U.S. Department of Health and Human Services for their efforts in developing the science-based dietary guidance
document, and certainly the IOM and the Institute of Medicine for this review.

As the DGA has far-reaching implications and impacts important nutrition policies, AFFI appreciates the attention given to how the DGAs are researched as they are developed. Indeed, the scope of the DGA has evolved since its inception from providing general nutrition guidance to making more obesity-specific guidance, and more recently tackling chronic and metabolic disease conditions.

Given this evolution, we urge that the process of developing dietary guidelines also evolve, particularly as it relates to, one, identifying research questions as the primary step of the process and prior to constituting the Committee, that the development of these questions be transparent and possibly available for public comment. Two, that the expertise representing the Dietary Guidelines for Americans Committee be broad and representative of public
health and nutrition experts, but also for instance, involvement of expertise in food science and food production as industry efforts are critical and their role can be critical to creating change.

To recognize that the evolving -- and third, to recognize that the evolving areas of dietary guidance represent extended term health outcomes and reliance on data accumulated over longer periods of time. Consequently, we urge that in its review the IOM, USDA, and HHS consider allowing sufficient time maybe in future recommendations to fully collect and review data. Cholesterol is a great example of this that demonstrates the changing nature of scientific evidence and the value of taking time and being patient to generate the valuable data that is required to guide these documents.

Additionally, as AFFI has expressed in the previous comments, to enhance the scientific rigor applied in the development of the Dietary Guidelines by using only relevant literature and
expanding its reference to data from the Nutrition Evidence Library.

As a last point, the DGA process will be well served with identifying metrics on the impact of DGA on public health initiatives. As an example again, promoting the intake of fruit and vegetables has been a central message of the current and past DGAs; yet, a recent Produce for Better Health, PBH Foundation 2015 State of the Plate report found that fruit and vegetable intake has actually decreased over time. PBH research also revealed that while fruit and vegetables are recommended -- that when fruit and vegetables are recommended in all forms such as frozen, canned, and dried, consumer perception and intake -- and intent to consume fruits and vegetables increases. So the message communicated by the DGA can be very beneficial in directing such desired outcomes.

AFFI is committed to aiding the agencies and the Institute of Medicine in their review of the Dietary Guidelines for Americans.
process, and we are invested in supporting
science-based public health-related guidance.

Thank you again for the opportunity to
provide this feedback.

MS. ROMERO: Thank you.

Okay, Ms. Johnson.

MS. JOHNSON: Good afternoon. My name
is Beth Johnson, and I very much appreciate the
opportunity to provide comments today.

As many of you know, I've been engaged
in Food and Nutrition Policy for nearly 25 years,
seven of those while at USDA. I was fortunate
enough to watch the Dietary Guidelines process up
close and personal. I saw the dedication of the
staff both at USDA and HHS, as well as the
Advisory Committee members as they worked to
develop and publish the U.S. Government's
official Nutrition Recommendations. And though I
didn't experience the controversy and questioning
of today in watching the '05 Guidelines being put
together, I did personally experience it in other
science-based policy matters such as food safety,
animal health, and the update of My Pyramid. In each of these areas, debates over the interpretation of the science and the subsequent policy decisions led to significant disagreement and skepticism by industry, consumer and public health advocacy groups, and even Congress.

My point only is that it's important to remember that although this conversation is about the Dietary Guidelines, identify a more widely trusted process to evaluate scientific data and make relevant policy decisions could have enormous benefits beyond nutrition.

The law passed by Congress governing the Dietary Guidelines dates back to 1990. They received broad support from public health and scientists to put the DGA process in law, and actually the first Dietary Guidelines was published before this table was built. At the time, we didn't have nutrition facts label on packaged foods, trans fats were still largely believed to be better than saturated fat, and the USDA organic standard did not yet exist. It makes
good sense to review our nutrition guidelines process now.

I believe I can safely say that there's nearly unanimous support for insuring that our nutrition recommendations are based in sound science, but that is pretty much where it ends. Accordingly and admittedly, these are thoughts based on conversations with real experts in scientific review processes rather than my own infinite wisdom. I will outline some specific thoughts that I hope will be considered at USDA and the National Academy of Science in its review of the Dietary Guidelines process. Inclusion in this list does not mean that it isn't currently part of the process; rather, it is a holistic view of a possible future process.

Number one, we've learned much about nutrition over the years and we still have a lot to learn. Accordingly, we need to make sure we have the best and most appropriate methodology for compiling and reviewing scientific data to formulate scientific consensus statements. This
should include coordination with mandatory
updates to the Dietary Reference Intakes or DRIs.
It must evaluate or evolve to appropriately allow
for updated ideas based on new data and new ways
of analyzing data, and the methodology should
eliminate as much bias as possible so it doesn't
matter who funded research, or who was involved
in that research. Good research is good, bad is
bad, and inconclusive is inconclusive period.

Transparency early and throughout the
process is paramount in developing the research
questions, compiling and analyzing the data, and
forming the consensus statements. All
stakeholders should be able to identify the
breadth and quality of currently available data
before the DGA process even begins. Having an
open and transparent repository of broad data
could make that happen. Questions continue in
regard to how the research questions carry over
from one version of the Dietary Guidelines to
another. Identifying the research questions with
adequate input and time to conduct research to
answer the questions should be part of the process.

With this information early in the process, those outside a particular research project could provide valuable input to strengthen the quality and usefulness of the research being conducted leading to more widely accepted results. A transparent systematic evidence-based review process where all stakeholders have ongoing access can take us a long way in setting a generally agreed upon research agenda leading to the next revision of the Dietary Guidelines, establishing relevant and agreed upon research questions, the development of science-based recommendations that consistently take into consideration the quality of research regardless of who funds it, and determining the foundation for updates as new data emerges.

Additionally, to help reduce so called inherent bias of Committee members there should be consideration of including life science
systematic review experts who do not have food or nutrition expertise.

In summary, over the last 25 years I have been engaged in food and nutrition policy. I'm not aware of a complete and detailed review of the manner in which we establish national nutrition recommendations. Getting politics out of science is impossible, every group including academics, scientists and industry are political and use the political process when it's advantageous to them.

I hope we take this opportunity to really look at the process. Thank you.

MS. ROMERO: Thank you.

Mr. Burns.

DR. BURNS: I'm Robert Burns, and I'm here on behalf of the Grocery Manufacturers Association. We fully support the development of the Dietary Guidelines for Americans and its importance to help guide nutrition policies, and assist consumers in developing healthier diets. We appreciate the huge amount of work contributed
by Advisory Committees, staff from USDA and Department of Health and Human Services over the past 35 years that's updated the information every five years. However, the route to that final policy document is not always an easy one. Thus, we truly appreciate the opportunity today to share some of our thoughts on ways that the process could be improved.

Perhaps the most critical component is the selection of the Advisory Committee itself. This will be a familiar theme, you've heard it before, but in order to facilitate selection of the panel members we suggest that USDA and DHHS first prioritize detailed topic areas which should be reviewed. This will require much more specificity than the current practice. For transparency these priority areas could be open for public comment before finalization. The finalized list should be used to select Committee members best equipped to address the priority topics.

Specific areas of expertise
notwithstanding, each DGA, Dietary Guidelines Advisory Committee should include expertise in dietetics, nutrition, medicine biostatistics, food technology, consumer behavior, physiology, and epidemiology. In situations where the Dietary Guidelines Advisory Committee needs to assess additional expertise these experts should be selected in a manner transparent that allows for public input. On controversial topics a range of scientists with varying points of view should be recruited and cross-examined by the DGAC in an open format. Scientists who work in or have worked in industry should be considered because of their practical knowledge.

If DGAC recommendations leads to changes in food composition then appropriate outside experts should be consulted to provide safety and risk assessments of those changes to help avoid unintended consequences.

To alleviate concern that the DGAC process has been politicized, appropriate measures must be taken to provide greater
transparency around any bias or conflict of interest that exists on the panel. Most scientists have their biases so a balance of divergent opinions is critical to assure the credibility of the DGAC.

On methods used to review scientific evidence, we feel that the Nutrition Evidence Library under USDA is a rigorous methodology that was designed specifically to maximize transparency, minimize bias, and insure systematic reviews of high quality that are relevant and timely. This process should be consistently applied when reviewing the scientific evidence and the Dietary Guidelines process.

In the last iteration, the DGA chose to use existing systematic reviews, meta analyses and reports rather than the NEL to address many research questions. Were the reports chosen because they were of high standard, or because the Committee agreed with the conclusions? A more transparent process such as the NEL that starts
with primary publications and performs a rigorous evaluation of them will result in recommendations that better reflect the strength and limitations of the evidence-base.

If systematic reviews are to be included they should adhere to the same standards utilized by the NEL to review the evidence-base. Additionally, a quality assessment should be done on all meta-analyses and systematic reviews prior to their consideration.

Many of the DRI reports on micro nutrients and macro nutrients which form the basis for Dietary Guidelines are now well over 10 years old, some of them over 15 years old and don't include much new research. The DGAC is not constituted with the charge, nor does it have the resources or expertise to revise DRIs; therefore, we urge you to consider ways that the DRIs can be systematically updated more frequently or at least those critical ones so that the Dietary Guidelines can focus on their priorities which is diets for the American public.
Ideally, the DGA and DRI cycles should be synchronized so that updated DRIs inform the DGA recommendations. Without updated DRI values, the DGAC is forced to use outdated information or develop informed opinions rather than a thorough review of the totality of the evidence.

As the Dietary Guidelines expand to cover birth to 24 months, it will be important to note the relative lack of quality research when developing balanced guidelines that address the full spectrum of infant feeding and they're also practical for use by new parents.

In summary, we feel the Dietary Guidelines can be used across the life span, but we must strive for credible, science-based recommendations coupled with practical advice on topics such as portion size that can help Americans make wise food choices within the context of total diet.

MS. ROMERO: Thank you very much.

Mr. Johnson.

DR. JOHNSON: Deliciousness, if there's
one word I would like to see you folks take away
from this proceeding it's that, deliciousness.

I'm Guy Johnson, Executive Director of
the McCormick Science Institute, and I'd like to
first start out by thanking CNPP and the
Departments for pulling together the 2015 Dietary
Guidelines; obviously, a formidable task. The
data are complicated and everybody has a
different idea of what they mean, but it's
really, really important, and it's really
important to the McCormick Science Institute
because four or five years ago we realized that
the 2010 Dietary Guidelines provided a great
framework for us to fund future research. So we
made the decision that our studies would be
designed to find out if spices and herbs could
help support the major areas of the 2010 Dietary
Guidelines, and potentially even help them be
more implementable. And what we found out during
that process -- and by the way, we are definitely
going to do that with the 2015 Guidelines, too,
but what we found out during that process is that
1 deliciousness is an amazingly important
2 characteristic if people are going to follow the
3 Dietary Guidelines. I suspect most of the people
4 in this room were aware of the data from the
5 International Food Information Council that shows
6 that taste trumps all other factors that people
7 weigh in making decisions about the food they
8 eat; healthfulness, price, convenience, you name
9 it.
10 The good news is research funded by
11 the McCormick Science Institute shows that herbs
12 and spices can help overcome that barrier. We
13 have studied that show that after five months a
14 group of people reduced their sodium intake by
15 nearly 1,000 percent through using herbs and
16 spices. We have data to show that herbs and
17 spices can make lower sodium tomato soup more
18 acceptable. We have data to show that herbs and
19 spices can compensate for dramatic reduction in
20 fat and calories at certain meals. We have data
21 to show that herbs and spices can increase the
22 intake and acceptability of vegetables, so we're
guardedly optimistic. We think there's something here to work with.

We are heartened that the departments put in the policy document that it encourages consumers to enjoy a healthy diet, and we were delighted to see that the document said to flavor foods with herbs and spices instead of salt. We can get on board with that. However, if you do a search on the policy document as I did, you'll find that there are 426 occurrences of the word "healthy" or iterations of it, and guess how many times taste was mentioned, nada.

So what we're thinking is that there's an opportunity here, and so we realize that the recommendations were science-based. We're not suggesting that considerations about taste trump science in future recommendations, but we do think that it's critical that the importance of taste acknowledged in the development of these guidelines, their importance to consumers, and we look for ways to encourage consumers and help them understand that they don't have to give up
As far as the McCormick Science Institute goes, we are going to continue to do research that will hopefully demonstrate that herbs and spices can increase the acceptability of healthier foods. We are eager to share that information with the departments, and we will continue to do that. So our thought is together let's make deliciousness the new destiny for healthier eating. Thank you very much.

MS. ROMERO: Thanks very much.

All right. Ms. Butts.

MS. BUTTS: Hi, I'm Kristina Butts with the National Cattlemen's Beef Association. NCBA's membership has a long history of supporting nutrition research, education, and communication programs to help consumers incorporate beef as part of a healthy and balanced diet. Our industry has a Statement of Principles regarding nutrition and health that have been in place since 1984 and are updated every five years. We've also engaged in the Dietary Guidelines process since the very
first edition and have a long history of
supporting the Dietary Guidelines of Americans.

NCBA recognizes the importance of
developing Dietary Guidelines based on the most
relevant nutrition research, but the 2015
Advisory Committee's process raised concerns the
agencies need to address for future Guidelines.
The agencies should expand requirements to
recognize the unique nature of the evidence
review process and add additional time for true
scientific peer review. For example, strong
scientific evidence was inappropriately excluded
from the NEL database without a real process to
formally request for the Committee or the Agency
to reconsider the evidence.

The Department should also develop a
way to insure scientific input is truly
considered. Three-minute oral statements do not
provide an opportunity to provide significant
scientific input on the Advisory Committee's
report.

Additionally, to insure sound science
is involved in the development process, the Agency should develop a way to evaluate that the recommendations are, indeed, effective. There is a need for large-scale clinical trial data to document positive health outcomes from the healthy eating patterns apart from association or observational data which is not always adequate for establishing health claims and, therefore, should not be the pillar used to define a healthy eating pattern, in our opinion.

The use of modeling data as the standard for evaluating levels of consumption is flawed. For example, the statement in the Final Guidelines, "average intakes of meat, poultry, and eggs for teen boys and adult men are above recommendations in the Healthy U.S. Style Eating Pattern." This statement is based solely on a comparison of current intake to theoretical modeling. While the healthy eating pattern is modeled at 18 percent protein, the Guidelines clearly recommends protein intakes within the acceptable macro nutrient distribution range of
10 to 35 percent calories from protein. Had the
Guidelines modeled a range of protein intakes
including higher protein intakes within the AMDR
which strong evidence supports positive health
outcomes, it would be clear that the subgroup of
the population is not over-consuming the
recommendation for protein foods such as meat,
poultry, and eggs.

The modeling is a method but not a
means to a recommendation, and can even mislead
the actual recommendations. The Agency should
consider expanding the time between updates of
the Dietary Guidelines for Americans. The updates
should be based upon significant scientific
evidence to warrant a change or reevaluation of
the previous edition. Currently, some federal
programs take more than five years to implement
the current guidelines before new recommendations
are finalized or close to finalization. This
change would also allow for a greater focus on
implementation, public education, and monitoring
changes in the composition of the food supply.
We also suggest the membership of each Advisory Committee should completely turn over without any previous members serving more than once to insure that evidence is fully reviewed and independent from previous Committees. The Advisory Committee should include a more diverse group of experts and research interests, including fields of study like food technology, education, and economics just to name a few.

NCBA also suggests the process needs to be remodeled to account for today's accepted evidence standards; that is to say, if the Guidelines were evidence tested today, would they hold up? For example, population-based patterns may not be helpful and could be harmful to individuals. There is a need to address the core question of whether population-based dietary patterns should be developed given new knowledge about how individuals differ or vary. The reductionist approach in nutrition science itself may not be the best approach to develop healthy eating guides. Individuals respond differently to
reduction or negative messages over positive messages on how to have a more healthful diet. There's a real need to return to the fundamental underpinnings of the recommendations and nutrient targets in light of today's standards of evidence.

Finally, our membership would support the Agency going back to the development of a simple eating guide for healthy Americans to follow. The Department should develop eating patterns by life stages and different levels of physical activity, not just guidelines for sedentary individuals with unhealthy lifestyles. It should be noted that the BMI or even body weight should not be the main measurement for overall health as there's many more factors to be considered.

In closing, NCBA and our membership appreciates the opportunity to provide a few suggestions for USDA to consider. We welcome further dialogue and discussions to insure future guidelines for Americans are scientifically
sound, remain within the scope of nutrition and health, and are easily translated by Americans. Thank you.

MS. ROMERO: Thank you, Ms. Butts.

Mr. Rubin.

DR. RUBIN: Good afternoon. I'm Micky Rubin, Vice President of Nutrition Research at the National Dairy Council representing America's dairy farmers. Thank you for the opportunity to offer comments to the USDA and the Institute of Medicine, Food, and Nutrition Board on the process of developing future editions of Dietary Guidelines for Americans. National Dairy Council will also plan to send more complete comments to the Institute of Medicine Committee when given the opportunity, but offers the following points for consideration at this time.

First, in support of developing the Dietary Guidelines for Americans, the Dietary Guidelines Advisory Committee would benefit from a clear scope of work established at the beginning of the process and the necessary tools
to accomplish that work.

Second, the five-year time frame to revise the Dietary Guidelines for Americans seems appropriate from a scientific standpoint in order to insure that new evidence can come to light and be evaluated, as well as to insure some continuity between editions of Guidelines.

In light of the five-year cycle, it may of value to carry over a core set of questions from cycle to cycle to allow for a better understanding of how the science on key recommendations has evolved. At the same time, the Committee's ability to provide the most current scientific recommendations would be advanced if it had the flexibility and tools to add new and emerging topics that may not have been relevant five years prior in addition to the core topics that would be consistent from cycle to cycle.

Third, insuring the quality of Dietary Guidelines requires that the Dietary Guidelines Advisory Committee review all high quality
studies on key topics based on publicly available, transparent standards for evidence-based evaluation of the science. Diet and health relationships of eating patterns, foods, and nutrients from both observational studies and randomized controlled trials should be considered taking into account the strengths and weaknesses of each type of study design. If dietary guidance is developed based solely on observational data without randomized controlled trials that have tested the associations identified the need for accuracy indicates that the level of certainty regarding these conclusions should be communicated as part of the recommendations.

Fourth, due to the large and growing volume of research on diet and health relationships new approaches to objectively evaluate and integrate large bodies of data may be required. Therefore, ongoing data collection and synthesis regarding key questions may be more effective and efficient in the long run than a one-time review every five years.
Fifth, the Dietary Guidelines Advisory Committee membership, a process that includes qualified experts should include a process on qualified experts in food, nutrition, and health from multiple types of organizations not only academic nutrition experts, and could contribute valuable perspective to complex topics. Furthermore, if a specific or specialized topic is to be reviewed by the Committee, the Committee's ability to conduct that review will be dependent on the presence of appropriate expertise on the Committee.

Lastly, updating the Dietary Reference Intakes regularly would insure accurate data on nutrient needs is used in the development of the Guidelines.

In closing, the National Dairy Council commends the USDA Center for Nutrition, Policy, and Promotion and the Institute of Medicine Food and Nutrition Board for their commitment to science-based dietary recommendations for Americans, and appreciates the opportunity to
provide input on the process of developing future Guidelines. Thank you.

MS. ROMERO: Thank you, Mr. Rubin.

Ms. Kleiner.

MS. KLEINER: Hello, and thank you for the opportunity to speak to you today about the 2020 Dietary Guidelines process. My name is Rima Kleiner. As a registered dietician, I work with individuals, particularly pregnant women and parents of young children, as well as companies such as the National Fisheries Institute who I am here on behalf of today.

So first I would like to applaud USDA and HHS on the recently released 2015 Dietary Guidelines for Americans. As a dietician who works with people and consults with food companies, I appreciate that the focus is on eating patterns and how to shift towards a healthy eating pattern. And this seems to be a real improvement from just providing recommendations to actually providing ideas to help us health care professionals help move
people closer to those recommendations.

On behalf of the National Fisheries Institute, which is a nonprofit organization dedicated to educating consumers, and health care professionals, and media about seafood nutrition, I would like to outline some areas that we feel can be improved upon to make the 2020 Dietary Guidelines more effective at reducing chronic disease and helping to insure that Americans meet their nutrient needs.

First and foremost, the 2020 Guidelines should continue to build on the positive changes that were made in 2015 towards including more specific examples of how to fit nutrient-rich foods into American's eating patterns. What we have found particularly useful with the 2015 Guidelines is the actionable language around shifting the diet to more fish and inclusion of real world examples about how to do this, such as the 2015 Guidelines recommend choosing a salmon, fillet, or a tuna sandwich as protein-rich options. We feel that providing
actionable specific language around what to eat makes it healthier -- makes it easier for health care professionals, and media, and ultimately consumers to make healthful choices.

We also support including and focusing on the zero to two years, and pregnant women populations in the next round of Dietary Guidelines. Moms-to-be and parents of young children are particularly risk averse groups as we know here, and these risk averse groups receive far too many confusing messages. We feel the 2020 Guidelines have a real opportunity to provide clarification around a number of foods, namely seafood. This would go a long way towards empowering women to eat seafood during pregnancy and encouraging parents to introduce fish to young children, including infants who are eating solids. As science shows, fish is a food that provides tremendous health benefits at all life stages even well before a child is born.

Next we would like to offer a suggestion regarding the selection of the Dietary
Guidelines Advisory Committee. Because the 2020 Guidelines will focus for the first time on the zero to 24 months age range, we support including real world obstetricians, pediatricians, and registered dieticians who work with these individuals, who work with pregnant women, infants, and young children on the Advisory Committee Board, or some type of Committee capacity.

Because pregnant women and parents of infants and children tend to be risk averse populations, it's imperative that there be Committee members who intimately understand both the needs and fears of these populations, as well as how to effectively communicate with them.

And, finally, we would like to address suggestions for improving the review of science. And we request that whomever is brought in to craft the Dietary Guidelines Advisory Committee report, whether they sit on the Committee or serve as consultants, or third-party experts, be selected in a public way, preferably by
nomination. Not only will this help to insure that the scientific review process is transparent, it also helps to insure that the Committee is selecting from a variety of experts that are credible and well versed in the topic being explored. Additionally, we support the use of the Nutrition Evidence Library in the scientific review process to insure continued transparency.

Again, thank you for your time today and for all of the hard work that you do to help us help Americans live a healthier life.

MS. ROMERO: Thank you, Ms. Kleiner.

Mr. Kovich.

DR. KOVICH: Good afternoon. My name is Dan Kovich, and I'm providing comments on behalf of the National Pork Producers Council. NPPC advocates on behalf of its 43 affiliated state associations which represent an industry that supports over half a million mostly real jobs and is very proud of its role in providing lean, high quality protein to the American diet.
As you look towards review of the Dietary Guidelines development process, we do appreciate this opportunity to allow us to comment.

Let me begin by saying that we understand the enormous undertaking it must be for CNPP to review the Guidelines and supporting research every five years. We do very much appreciate the dedication of the staff and volunteers who contribute to this process, and hope that our comments will be viewed as opportunities to enhance these significant efforts.

First, NPPC feels that selection and composition of the DGAC must include pertinent experts and done in a transparent manner. Considering the food patterns approach that the DGAC took for the 2015 edition it is the opinion of NPPC that the Committee was missing experts that could be crucial in analyzing the new and emerging scientific evidence.

NPPC encourages the agencies to include representatives from groups that are
understanding of both the nutrition dietary research as well as its real world application. By way of example, the Committee would be well served by including registered dieticians or other health professionals that work with people with nutritional challenges on a daily basis and have practical experience with the challenges of interpreting and applying the Dietary Guidelines to the populations they serve. Also of value would be members that have a strong technical understanding of food production and distribution. Diversifying the Committee membership will help insure that its recommendations are practicable and achievable.

Additionally, there does need to be an emphasis on a transparent nomination and selection process. While the call for nominations is done publicly, it is difficult, if not impossible, to determine how the Committee members were actually chosen.

Second, the DGAC must apply the rigorous standards required by the Nutrition
Evidence Library to the evidence guiding its deliberations. The NEL maintained by the USDA was established specifically to insure consistent high-level scientific rigor, freedom from bias, and transparency in federal nutrition-related decision making.

We believe it is important to use this gold standard process versus making recommendations based on consideration of existing reports, reviews, and meta analyses from outside the NEL as we saw occur from the release 75 percent of the 2015 Advisory Committee report. Outside reviews are not subject to the same level of screening that the NEL applies and they're getting independent evidence. Movement away from the NEL has created the impression that science has cherry-picked to create the final recommendations. Use of the NEL would insure a consistent scientific basis is applied to all data, studies included, thereby increasing the transparency and improving public trust in the process.
Additionally, we would like to see more transparency around which studies are included in the NEL for consideration. Though there are criteria published for conclusions -- inclusion, it is not clear if studies submitted -- it is not clear if studies submitted that we believe meet the criteria are actually included for review.

Finally, the DGAC must stay within the scope boundaries set by law which informs its charter and limits the DGA's scope to diet and nutrition. While NPPC was encouraged to see that the agencies acknowledge a scope issue and disregard the recommendations made by the Advisory Committee regarding sustainability, we do want to emphasize our disappointment that it was so heavily discussed throughout the process taking time and resources away from other important nutrition issues.

We fully appreciate the importance of the subject. Sustainability is something that pork producers take very seriously, but this
Advisory Committee did not have the mandate nor the experience needed to adequately address this topic. In order to insure that the Dietary Guidelines Advisory Committee stays within scope, we recommend that the research questions be provided publicly in a transparent manner at the beginning of the process with adequate time for public comment before the Committee begins its work.

In conclusion, NPPC is very appreciative of this Listening Session and the willingness of the USDA to work with stakeholders to improve the Dietary Guideline process in 2020. We believe that modernization of the process will be an important step forward for everyone. Thank you.

MS. ROMERO: Thank you, Mr. Kovich.

Ms. Gentile.

MS. GENTILE: My name is Maggie Gentile and I'm representing the National Turkey Federation. NTF is pleased to submit the following comments to the U.S. Department of
Agriculture.

NTF represents nearly 100 percent of all turkey processors, growers, breeders, hatchery owners, and allied companies. It's the only National Trade Association representing the turkey industry exclusively.

NTF is supportive of the Dietary Guidelines and is encouraged by the Agency's interest in improving the process as we look towards the 2020 edition. This is particularly important given the process has not been evaluated since its original conception in the 1980s.

Reviewing the 35-year old process makes good sense given the Guidelines serve as the cornerstone for not only federal food policies, but have now begun to take on an even more critical role as states and local food policies, voluntary programs, and other standards look to them.

Transparency and scientific rigor throughout the development process assures the
recommendations are based on all available scientific evidence in order to be viewed as a credible basis for food and nutrition policies. To achieve this, NTF believes the Agency should focus its efforts on four key areas which include choosing diverse and qualified experts, clarifying the DGAC's scope, relying on the evidentiary standard, and increasing transparency throughout the process.

NTF appreciates the opportunity to put forward recommendations of experts to serve on the DGAC. Recognizing the charter seeks members who are familiar with current scientific knowledge in the field of human nutrition and chronic disease, we believe given the implications and the attention on the food supply the addition of a food scientist and someone with food production expertise should be considered for future editions. While all industries are different, some level of agriculture production or food industry expertise would be to the benefit of the Guidelines.
Much of this past year was spent making sure the Committee didn't veer beyond its charter's mandate to develop a publication that shall contain nutritional and dietary information and guidelines based on the preponderance of scientific and medical knowledge current at the time of publication.

Clarification of DGAC's roles and responsibilities at the beginning of the process, as well as ongoing efforts by the Agency to keep them on task throughout the process is needed. This would save time and resources that the Committee should use to focus its attention on accomplishing the task of developing science-based advice, while additionally saving time and resources of the public in responding to those recommendations. Should the Agency seek to expand its scope or hone in on particular issues, efforts to include qualified experts in these areas should be considered, and the public should be made aware.

Another issue NTF encountered this
year was confusion around the evidentiary standards. With ever increasing scrutiny on the role of science on policies, it's imperative that there is complete transparency in the process, tools, and information used to evaluate that science. It's our understanding that the Nutrition Evidence Library was designed to create a rigorous protocol-driven methodology designed to minimize bias, maximize transparency, and insure relevant, timely, and high quality systematic reviews, inform federal nutrition-related policies, programs, and recommendations. However, it seemed as though modeling and reliance on previous literature reviews were more heavily utilized in the last edition. A more clear understanding of the level of reliance on USDA's very own gold standard, the NEL, should be explained at the beginning of the process. Given we fully support the systematic evidence-based analysis approach that the NEL provides, it and the DGAC process could be enhanced by providing stakeholders with
information in an ongoing basis in real time. For example, providing research questions and literature lists, and identifying how the literature is used to answer the research question selected would better inform the public throughout the process.

Thank you for the opportunity to comment. NTF looks forward to participation throughout the USDA and IOM review process.

MS. ROMERO: Thank you, Ms. Gentile.

Ms. Booren.

DR. BOOREN: I'm Dr. Betsy Booren, Vice President of Scientific Affairs for the North American Meat Institute. I commend you for affording stakeholders the opportunity to provide insights and perspectives on the Dietary Guidelines development process.

Improvements to this process can be used to develop attainable and achievable nutritional policy to improve the health of Americans. We believe that the American public is best served with dietary guidance that helps
consumers achieve a healthy diet within their lifestyle which allows flexibility for cultural preferences, convenience, and affordability when they're making their food choices.

The Guidelines must measurably improve the health of Americans. It's a common axiom that you manage what you measure, and yet there is no publicly available measurable evaluation of whether the Guidelines improve America's health. The Guidelines are developed every five years without any internal or external metrics to determine what has been effective and what is not, and we, both the government and the industry, are developing initiatives and programs around the Guidelines that have never been evaluated for their efficacy. This missing information begs the obvious question. If there's no publicly shared evaluation during the last 35 years, should we forge ahead on the same path without such information?

Metrics are critically important, metrics would identify specific areas that need
improvement and help focus resources, areas of research and provide data that would identify if certain sub-populations have specific needs. For instance, developing metrics would tell us whether developing the Guidelines every five years is effective, or whether the process should occur more or less frequently.

We recognize that such a change would be a fundamental shift in the Dietary Guidelines process, but it is a necessary and we believe a critical step to improve the effectiveness of the Guidelines and achieve what is needed, a measurable improvement of American health.

The scientific evidence as evaluated through the Nutritional Evidence Library should be the foundation of all nutritional policy. It is incumbent on USDA and HHS to develop nutritional policy based on recommendations derived by the NEL process to screen out low quality reports and reduce bias by the assistance of impartial NEL librarians, which is one of our concurs with the 2015 Dietary Guidelines Advisory
Committee.

Using the NEL provides significant transparency in developing the Guidelines, and not utilizing the NEL calls into question the credibilities and the decisions, and suggests the process could be biased. Moving the NEL into a non-policy research-orientated agency of HHS or USDA should be considered.

In addition, the NEL should be made publicly available throughout the entire process of developing the Guidelines. Without access at the very beginning the public may not be able to provide timely and meaningful comments like submitting research that may have been overlooked, or raising concerns with what was available, or what has been evaluated in the NEL. Allowing the public to view the current list of questions with the NEL may greatly improve the transparency of the process, as well as assist the Committee in finding data gaps.

The Departments must insure that the Advisory Committee does not exceed the scope of
its expertise and its charter. Active management by the Departments of the Advisory Committee would prevent extraneous recommendations from being included, thus guaranteeing that the Advisory Committee is focused on its mission, and more importantly respecting their time and energy that was volunteered.

We believe that food scientists and consumer behaviorists should be on the Advisory Committee. These disciplines play important roles in contextualizing the availability of food in American diet, and are critical in making nutritional policy recommendations. They offer practical applied perspectives that would insure the final Advisory Committee recommendations are more robust and achievable.

We believe that the Advisory Committee's deliberations should be more readily accessible to all Americans. The format of the meetings and the transparency of the Guideline process we believe needs improvement. They should -- USDA and HHS should expand the meeting format
to include both the webinars and make those also in-person meetings. The webinar format ignores a simple fact that the deliberations may trigger a legitimate comment on site and further thought process.

Finally, we believe that the Department should publicly summarize the comments to the Advisory Committee report and provide stakeholders the rationale on why the comments were considered or disregarded in the final policy department. We recognize that this is a timely and laborious process, but responding to public comment is something the Departments regularly do and would provide the transparency that the comments were at least read and considered.

I thank you for your time and consideration. We hope that you continue to see the Meat Institute as a collaborator in improving American health.

MS. ROMERO: Thank you, Ms. Booren.

Mr. Walsh.
MR. WALSH: Good afternoon. I'm David Walsh from the Snack Food Association, and would like to thank the Center for Nutrition, Policy, and Promotion for providing my organization with the opportunity to express our thoughts on the process for developing future editions of the Dietary Guidelines for Americans.

Snack Food Association, or SFA, is the International Trade Association of the Snack Food industry representing snack manufacturers and suppliers. Founded in 1937, SFA represents over 400 companies which produce a wide variety of snacks ranging from chips, to meat snacks, to crackers, pretzels, popcorn, cheese snacks, cookies, snack cakes, granola bars, as well as dried fruits, vegetables, and nut mixtures.

I'd like to begin by commenting on how the Dietary Guidelines Advisory Committee is selected. While we appreciate the opportunity to submit names for consideration, SFA believes it would be valuable for the Institute of Medicine to explore the ways in which the DGAC selection
process can be made more transparent.

One of these ways may be to understand how the Agency makes its determinations on who will participate. We would also consider to be especially valuable for the Committee to include individuals with deep experience in the fields of food science and food production, an area that has lacked in previous editions of the Dietary Guidelines. To avoid politicizing the DGAC, measures must be established and implemented to minimize bias of conflicts of interest.

Regarding the research questions, we believe this is another area where transparency could be improved. SFA understands that the Committee along with the Agency identifies and drafts the research questions. SFA would like the Institute of Medicine to consider a recommendation which incorporates public participation in this process, including allowance of questions for consideration to be submitted. Once these research questions are drafted and decided upon it would help our
industry if they were made available sooner in order to give our industry adequate time to share information and research in the areas of question. Additionally, the questions should be available to other subject matter experts to gather input on the questions being considered.

SFA hopes the Institute of Medicine can clarify the DGAC's required reliance on the Nutrition Evidence Library. In previous editions, it was our understanding that in some cases rather than conduct a systematic review using NEL, the Committee adopted conclusions from other published reports. Given the highlighted scrutiny we deem use of the NEL essential in order to have a science-based Dietary Guidelines report.

The current statutory mandate for the DGAC calls for the establishment of dietary advice based on the preponderance of evidence. The term "preponderance" can be a little misleading as it suggests a higher value placed on quantity of evidence over quality.

Additionally, SFA strongly believes
clarifying the Committee's statutory mandated duties at the beginning and throughout the process should be recommended by the Institute of Medicine. This would help avoid concerns and comments from the public that the Committee has ventured outside nutrition recommendations and insure appropriate qualified Committee members are chosen.

Again, I thank you for the opportunity provided to my organization to submit comments, and look forward to working with USDA and HHS to insure an efficient and transparent process for 2020.

MS. ROMERO: Thank you, Mr. Walsh.

Ms. Gaine.

DR. GAINE: I'm Courtney Gaine with the Sugar Association. The Sugar Association thanks you for the opportunity to provide comment for the Institute of Medicine as they embark on their evaluation of the Dietary Guidelines process.

The Sugar Association represents U.S. sugar beet and sugar cane growers and processors,
and has been actively engaged in public comment throughout the history of the DGA's process, and we appreciate the opportunity to continue to do so.

It is our hope that this comprehensive evaluation by the IOM is performed with the same rigorous methodology that has helped to build their global reputation. We also hope that the Secretaries seriously consider the IOM's findings, and that Congress appropriates adequate funds to insure meaningful reforms are a reality. We believe that reform is essential given the magnitude of impact the DGAs have not only on government programs, but also on almost every aspect of our food supply, including agriculture.

From its original mandate in 1990 to present day, the scope and the application of the DGAs has expanded beyond its original intent; yet, there are legitimate concerns that the Guidelines today are based on weaker science than they were intended to be.

We feel that there needs to be more
checks and balances built into the process so that for any guideline cycle no group, person, or ideal can have more influence over the outcomes than what a quality transparent evaluation of the science.

First we need to define the DGAs in a new century. Moving forward it is important to specifically define the audience, purposes, and the scope of the DGAs. The DGAs should be reformed to be practical and contain measurable goals, and we need to start measuring them. We need to insure continuity with each successive iteration of the DGAs. Each DGA cycle has led to the identification of a large number of important research needs. Addressing these are critical to advancing our knowledge of diet and health, yet they seem to get lost amidst the Guidelines themselves. Worse yet, many research needs reappear year after year. It would be beneficial if these needs were formally submitted to research funding agencies at the end of the process with resources allocated and calls for
proposals issued to address these gaps. The next
DGAC should start with these research needs and
determine if there are now data to address them.

The focus should also shift to the
quality of questions answered and not the
quantity. Topics to be addressed by each DGAC
should be prioritized based on public health
importance, but more importantly they should be
based on those topics where new science would
alter a previous DGA recommendation. Questions to
be addressed should not be based on circumstances
where members of the DGAC's opinions differ from
those of the past DGAC.

When the breadth is as expansive as
it's become, the quality of recommendations
suffer and so does the trust of Americans.
Research questions should not be developed in-
house by the DGAC, but instead the questions
should be developed by actual experts in the
field of interest and reviewed by evidence-based
methodologists. Questions should be released for
public comment and input considered. The question
is critical to the conclusion and moving forward, more care needs to be taken to insure the right question is being asked.

The Guidelines should be based on the DRIs. We recognize the problem with doing this currently is that there is no formal plan for regularly updating the DRIs and, therefore, no funding. Congress should mandate and allocate funds for DRI updates for each nutrient every 10 years. The Guidelines should also occur only every 10 years and incorporate these new DRIs. This will significantly lessen the burden of numerous evidence reviews for each version of the DGAs and, thus, will transfer energy and expertise to translating DRI reports into guidance that's founded on expert review of the highest quality literature.

Recognizing that this coordination may not happen immediately there are ways by which the current process can be enhanced. The NEL process should be strengthened. This process is well designed to lead to high quality evidence-
based conclusions; however, a few issues have prevented its effectiveness.

First, the NEL has to actually be utilized in order to work. The NEL should be employed for all questions except for when a NIH or IOM report has been published since the last Guidelines. More checks and balances need to be put into the NEL process to minimize individual DGAC member bias, as well as group think. The data should speak for itself.

One important and necessary change to the process is the engagement of true evidence-based methodologic experts who would take on the responsibility of both searching and grading the evidence independent of DGAC input, but with the assistance of a topical expert. This process is a science in itself and it's naive to think that volunteers with brief training have the expertise to carry this out in a manner that is required for reviews of this magnitude.

Lastly, USDA food pattern modeling has too much power. The influence that the food
pattern modeling now has over the DGAs is far too
great given these patterns have never been tested
for health benefit. Until trials are conducted to
test these patterns versus other patterns of
similar calories, et cetera, food modeling needs
to be vastly de-emphasized. It's misleading to
base prescriptive recommendations on an untested
modeling exercise. Thank you.

MS. ROMERO: Thank you, Ms. Gaine.

Mr. Green.

MR. GREEN: Well, thank you very much.

My name is Randy Green, and it's an honor to be
here on behalf of United Egg Producers.

UEP believes that the study the IOM is
going to do can be useful and helpful. Having
said that, I would also say UEP does not proceed
from a belief that the current DGA process is
sort of fundamentally or fatally flawed, nor
frankly do we have any violent criticisms of the
2015 Advisory Committee. No doubt some things
could have been done better, but I think our hope
is that the IOM study will be an opportunity to
maybe think through some ongoing issues that have
been around for some time and are not necessarily
peculiar to 2015. People don't follow the Dietary
Guidelines, the process for developing them is
not well understood, and the public has a feeling
that dietary guidance has been inconsistent over
time. So let's take each of the three topic areas
you mention.

Topic one, the DGAs should be timely
and current because nutrition science does evolve
and change. We think every five years is about
the right interval. I think our concern with a
longer period like 10 years is that we'd be
running the risk of perpetuating outdated advice
even when the government knew that it was no
longer valid. I'm going to mention cholesterol in
a moment, but it won't surprise you that I think
that's a good example. We have a number of other
incisive points in this area. I don't have time
to say them now, but I'll leave my paper with
you.

The only other thing I'd add is, UEP
would hope that going forward that the DGA can
try to bring some additional clarity to the
longstanding arguments over fats and
carbohydrates because if you think about it, this
is probably the single biggest area of
controversy in dietary guidance. You know, the
advice to consume fruits and vegetables, dairy,
other nutrient-dense foods is longstanding. It's
certainly not fully successful, but it's not
particularly controversial, and it's been pretty
consistent. When people say the government tells
me to eat one thing today and another thing
tomorrow, the fat carb arguments are usually what
they have in mind, and sometimes they don't even
mean dietary guidance. What they mean is the fad
diet I'm on now is different from the fad diet I
was on last year, and it's got to be the
government's fault. But it's also true that
advice about lipids has changed over time. There
is no longer much emphasis on total fat, for
instance, there would have been 10, 20 years ago.
And, obviously, the limit on cholesterol has
dropped this year quite rightly in our view given the science and consistent with the American Heart Association and other guidelines. But going forward our hope is the DGA can grapple with these controversies, including some of the newer evidence about saturated fat, and also maybe even focus on whether some of the older 50-60 year old studies in some cases were actually valid to begin with.

Topic two, I would just ask do all the members really have to be college professors? And immediately add, as Jerry Seinfeld would if he were here, not that there's anything with that, but UEP thinks that USDA and HHS ought to consider appointing, for example, retired experts in nutrition science from the private sector and from government, as long as they don't have any current conflict of interest, and that would really bring some valuable perspective and diversity to the discussion. Identify the topics to be covered up front, as several other people have said. If a
topic is legitimate, get one or more experts on the Committee who knows something about that. Now the obvious example from 2015 is sustainability. From our standpoint, it's not unreasonable to think about sustainable nutrition in this context, but if there are going to be recommendations they need an evidence-base rather than an emotion-base. And we would add that right now as best we can tell the integration of several different scientific fields that would be necessary to make recommendations in this area just is not there yet.

Topic three, I won't say much here because I'd be dittoing what other people have said, but up front transparency I think is a good mantra. You can't over-explain the steps to the public. Err on the side of being more transparent about it.

And again, a couple of other points that will be in my written statement, but I'd end by saying that there really needs to be better integration of the DGA process with the
development and updating of the Dietary Reference Intakes. And a couple of other people have mentioned this, as well. We need to look for ways to get the DRIs updated on a schedule that will be maximally useful to the DGAC and to USDA and HHS as they write the actual guidelines. Unfortunately, this probably is going to require some money from somewhere but we need to have that conversation. So thank you very much again for the opportunity to appear.

MS. ROMERO: Thank you, Mr. Green.

Ms. DiSogra.

DR. DiSOGRA: Thank you. Good afternoon, everybody. I'm Lorelei DiSogra. I'm the Vice President for Nutrition at United Fresh Produce Association, and thanks very much for the opportunity to be here and to comment.

I'm really glad that my colleague sitting next to me said we don't have any -- didn't have any problems. I'm going to ditto that part. We don't have any problems either with the 2015-2020 Guidelines. Maybe those of us are
all at this end of the table because we start with the end of the alphabet here.

So, anyway, I have a long history with the Dietary Guidelines. It seems like my whole career. And, you know, specifically around how do we translate the Dietary Guidelines around fruits and vegetables into something that's actionable for the public and into easy to understand recommendations. And, you know, worked really hard when I was a fed in the summer of 2004 and creating the earlier version of MyPlate and kind of the distribution of everything, and the half a plate being fruits and vegetables. That's not a surprise to most of you.

Okay. So we really believe that the Dietary Guidelines are really important, and maintaining the integrity of the Dietary Guidelines is really important. And I really find as a public health nutritionist this fight that everybody is having over everything nutrition, when many of us want the Dietary Guidelines to instantly improve public health, so do I. But
look at the environment that everything is happening in, and what role we all play or don't play in trying to improve that environment.

The Dietary Guidelines matter, and they matter almost more now in the last 10 years, 8 years than they've ever mattered before, at least for me. They matter because now they're the foundation of policy, and lots of federal nutrition policies have changed. They've been aligned with the Dietary Guidelines and that makes them very, very important. They are still national nutrition programs that need to change, need to be aligned with the Guidelines, and so they're going to stay important. But clearly, they're very, very important and have many ramifications.

United Fresh believes the 2015-2012 Dietary Guidelines accurately reflects the decades of science on fruits and vegetables, including the role that fruits and vegetables play in promoting good health, and how a diet low in fruits and vegetables contributes to increased
risk of chronic disease and poor health.

We have watched over many cycles of
the Dietary Guidelines. Yes, in fact, they've
always said eat more fruits and vegetables, but
we've gone from eat more fruits and vegetables to
eat five servings of fruits and vegetables a day,
to eat five to nine, to now half a plate. So the
science behind that and the specificity and the
clarity of the recommendations have changed.

And we believe that the conclusions
that were made by the Dietary Guidelines Advisory
Committee regarding fruits and vegetables were
the right conclusions. There's one line in the
Committee's report that we particularly like,
that when they say a diet that's high in fruits
and vegetables are the only dietary
characteristics consistently associated with
positive health outcomes. And again, we believe
that's based on decades of research from all
types of research, U.S., international, et
cetera.

It's a serious problem in the U.S.
People eat a very low intake of fruits and vegetables, so this is a really serious problem. And, you know, we believe that reinforcing this message and making it as clear as possible is important.

As we all know, the Dietary Guidelines can only improve public health if they're adopted. I wish I had a magic wand. I wish that every time the publication came out every five years we could wave that magic wand and instantly we would improve public health, but that's a really big task, and that involves individual change, policy, environmental change, change in norms in society. And there hasn't really been a lot of attention on many of those avenues of really improving diet -- you know, using the Dietary Guidelines to improve public health.

As I've mentioned, the last 8 to 10 years we've seen real action in putting the Guidelines into place for federal nutrition programs. We believe that bold action and policy changes are really important, and that's probably
across the board, but our area is fruits and 
vegetables.

We urge policy makers to align all 
federal programs with the Dietary Guidelines, the 
2015 Guidelines to accomplish this goal, and to 
think about the broad range of policy changes and 
environmental strategies that are necessary. We 
are big proponents, obviously, of make half my 
plate, make half your plate fruits and 
vegetables, a really positive message. And if 
we're thinking about positive graphics and 
positive messages, if all Americans did that we 
wouldn't have to worry so much about them over-
consuming perhaps other things. Thank you.

MS. ROMERO: Thank you.

Ms. Kinnaird.

MS. KINNAIRD: Our comments for the 
Wheat Foods Council were incorporated in the 
comments made by Ms. Sanders for the American 
Bakers Association and the Grain Chain.

MS. ROMERO: Thank you very much. Okay, 
on behalf of USDA, I want to thank you for
participating in this session, and thank you for respecting the five-minute timeline. Please remember that your written comments, especially those of you that didn't get through all of your comments, you can leave them with Susan as you're leaving. We must exit the room immediately after this, so please, if you have discussions with each other, please take those outside.

Following today's session, USDA is going to provide the unedited transcript to IOM prior to their initiation of that comprehensive study of the Dietary Guidelines development process, and USDA encourages you to stay in contact with the IOM once it begins the study. So as you exit this room, please stop by the security desk and return your visitor badge, and Susan will escort you out now. Thank you.

(Whereupon, the proceedings went off the record at 2:23 p.m. and resumed at 3:30 p.m.)

MS. ROMERO: Okay, great. We'll go ahead and get started.

On behalf of USDA, I want to thank you
for participating in this Listening Session. USDA appreciates your insights as a leading organization interested in the Dietary Guidelines for Americans.

My name is Kathy Romero, and I'm your facilitator, and our host is USDA's Center for Nutrition, Policy, and Promotion. And listening in we have the CNPP Director, Angela Tagtow, and we have the Deputy Director, Jackie Haven.

The purpose of the session is to get comments from leading member-based organizations like yours to get greatest diversity of perspectives on the process for developing future editions of the Dietary Guidelines. And in addition to considering a member-base, USDA also considered other factors, including representation across health and nutrition sciences, having folks that had a level of engagement during the 2015 to 2020 Dietary Guidelines development process, and representation of the diversity across food and beverage categories.
There are three Listening Sessions being held and they include representation from the professional health organizations, consumer advocacy groups, trade organizations, and other federal agencies.

Your remarks are going to be recorded and shared verbatim with the Institute of Medicine Food and Nutrition Board prior to their initiation of a comprehensive study of the development process for the Dietary Guidelines. This was a directive that was outlined in the FY 2016 Consolidated Appropriations Act.

Today your remarks may address how the Dietary Guidelines can prevent chronic disease, insure nutritional sufficiency for all Americans, and accommodate a range of individual factors, including age, sex, and metabolic health. Your remarks may address processes for selecting the Advisory Committee, methods used to review scientific evidence, and processes for developing the Dietary Guidelines across a life span. And this is actually per the 2014 Agriculture Act.
which states that "The 2020 edition of the Dietary Guidelines will expand to include nutrition guidance for infants and toddlers, birth to 24 months, and women who are pregnant."

We have a couple of housekeeping items. The first thing is I want to talk about this beautiful table that you're sitting at. It's 36 by 12. It's mahogany and leather, and it was built specifically in this room for the Summit of Industrial Nations. And that was held here in the Williamsburg Room in 1983, May of '83, and it was hosted by President Ronald Reagan. And that's why they don't allow food and beverages in here is because they want to protect this national treasure.

You're going to have the opportunity to provide up to five minutes of oral remarks at this Listening Session, and as I said before, all the remarks will be recorded. That's what these items are in the middle of the table, to record. At the beginning of your remarks, please clearly state your name and organization,
and make sure your green light is on your speaker. There are timekeepers available. The two ladies right here are timekeepers and they will hold up signs at the one-minute mark, the 30-second mark, and when you have no time remaining. I'll be very firm on the no time remaining, and just let you know that it's time to move on. Please respect the five-minute time limit to insure that everyone has their full time for remarks.

One of the things we can say is that you have the opportunity to provide your written remarks. If you shouldn't get through everything, you can provide those written remarks as you're leaving today. You can provide them to Susan and they will be included in the transcripts, et cetera.

So to reiterate, this is a Listening Session. It's an opportunity for USDA to hear your perspective on the Dietary Guidelines development process. We're going to go in alphabetical order by name of the organization
with one exception. We do have someone who has to
leave early so we'll let that person go first.

And then following today's session,
USDA is going to provide an unedited transcript
to IOM. This preliminary assessment is not meant
to override IOM's plan to gather its own insights
from stakeholders, which USDA anticipates they're
going to do as part of their independent study.

I'm going to apologize in advance for
any mispronunciation of anyone's name. So let's
go ahead and get started with Ms. Ritchie. Thank
you. Turn your mic on.

DR. RITCHIE: On behalf of the
University of California's Nutrition Policy
Institute, I would like to offer support first
for the Dietary Guidelines Advisory Committee's
evidence analysis process. And secondly, for the
expansion of the Dietary Guidelines to include
pregnant women, infants, and toddlers.

I'm the Director of the Nutrition
Policy Institute and a Cooperative Extension
Specialist. I have a doctorate in nutrition and
am a registered dietician, and I've conducted
nutrition research for over two decades.

The Nutrition Policy Institute and its
predecessor, the Center for Weight and Health,
are known for conducting rigorous research and
evaluation to inform and strengthen nutrition
policy with an emphasis on the federal nutrition
system's programs, young children and families.

Through research, our aim is to
improve public health and prevent obesity and
chronic disease, diabetes, and other illnesses.
While I have not served on the Dietary Guidelines
Advisory Committee in 2005, I was among the first
evidence analysts trained in the Academy of
Nutrition and Dietetics, Evidence Analysis
Process, after which much of the DGAC Committee's
work is closely modeled.

In 2006, I was the lead author of the
first Academy paper to use the systematic review
process, and also co-authored a subsequent paper
using the process in 2013.

Collectively at NPI we have reviewed
hundreds of scientific publications involving a spectrum of research designs. We also have reviewed evidence tabulated by other analysts to answer questions and drive recommendations, the same process used by the DGAC Committee.

I have carefully examined the methods chapter of the 2015 report and can attest that the Committee did an outstanding job of following the systematic review protocol, the highest bar for evidence analysis. In addition to the Academy of Nutrition and Dietetics, the Committee's state-of-the-art methodology is informed by the Agency for Health Care Research and Quality, the Cochrane Collaboration, and the IOM.

There are five reasons why I believe the DGA Committee's evidence analysis process is to be commended and to be continued. First, it is systematic. Strictly prescribed procedures were followed for each and every step of the process. Second, it is thorough because studies are identified by skilled librarians searching multiple databases. The studies were then
screened to meet pre-identified inclusion criteria and articles were hand searched for additional studies not identified through the electronic searches. Third, the process is inclusive. Not only were randomized controlled trials included, which as you know are the gold standard for causal inference, but also other controlled trials, observational studies, reviews, and meta analyses. Fourth, it is transparent in that all materials utilized in the process are maintained on line and public comment and public hearings are held throughout. Lastly, the process is designed specifically to minimize bias. All studies were abstracted and quality rated by trained analysts so that the evidence could then be appropriately weighed by the Committee to answer questions and drive their recommendations. In this way, all relevant studies were considered in relation to their strengths and their limitations.

This rigorous approach is warranted given the national importance of the Dietary
Guidelines. The Guidelines are the evidence-based foundation for recommendations for health of the population as a whole. They are the basis for the Federal Nutrition Assistance Programs, determine the WIC food package, WIC education, the school meal requirements, the meal patterns of the child and adult care food programs, SNAP benefits, and SNAP education. Health care practitioners and nutrition professionals can also use the Guidelines as the starting point for counseling individuals, adapting them to accommodate a range of factors such as age, sex, and metabolic health in order to provide individualized recommendations.

In addition, public health professionals, researchers, advocates, and the like rely on the Guidelines to design and evaluate nutrition education interventions and improve environments to support healthy eating. And because nutrition environments do matter from the very beginning of life, I applaud the USDA and Health and Human Services for their plans to
include pregnant women and young children from birth to 24 months of age in the next Guidelines.

When I first my research career, the scope of the obesity epidemic and our understanding of the causes were such that obesity was thought to be a concern only for older children and adults, not infants and toddlers, but we now know that we can't wait until children are teens because nearly one in four adolescents have diabetes or pre-diabetes. We now know that we can't wait until children are school aged because one in five are overweight or obese by the time they start kindergarten. And we now know that nutrition early in life is critical for setting the stage both biology and behaviors for a lifetime of health.

In conclusion, nutrition is continuously evolving science and it's critical that we continue the Dietary Guidelines. Thank you.

MS. ROMERO: Thank you.

Okay, Ms. Maslow.
DR. MASLOW: Thank you. Good afternoon, and thank you for the opportunity to comment on the process for developing future editions of the Dietary Guidelines. I'm Dr. Lindsey Haynes-Maslow, Food Systems and Health Analyst with the Union of Concerned Scientists. Union of Concerned Scientists puts rigorous independent science to work to solve our planet's most pressing problems. Working with citizens and scientists across the country we combine technical analysis and advocacy to create practical solutions for a healthy environment.

Today, I will be focusing on six points regarding the purpose and process for the Dietary Guidelines. First, we need to determine and clearly communicate the purpose of the Dietary Guidelines. Should the Guidelines serve as scientific dietary advice for the American public, or are they a public policy statement for various stakeholders, including but not limited to federal food programs, schools, health care institutions, and the food industry?
Now, the National Nutrition Monitoring and Related Research Act states that the Dietary Guidelines shall contain nutritional information for the general public. However, as demonstrated by the process surrounding the 2015 Dietary Guidelines report, Congress and industry lobby groups actively worked to reshape the Guidelines as a statement of policy, rather than a statement of science.

Second, we commend the 2015 Committee that developed the Guidelines in a two-year process. This was scientifically rigorous, open, and transparent. We advise the USDA to educate all stakeholders, including Congressional leaders about the robustness of this process early on and consistently throughout to limit the corporate and political interference to which the 2015 Guidelines were subject to.

The Committee did a critically important work to bring together various aspects of evidence-based dietary recommendations, and as scientists with food and agricultural expertise
we concur with the recommendations and the overall assessment that a healthy diet is one that includes higher fruits and vegetables, whole grains, lower red meat, and sugar sweetened beverages, and we included the environmental sustainability considerations.

Third, to assure impartiality and respect for the scientific process there is a need for greater transparency once the Dietary Guidelines leave the Committee and go to the USDA's administrators for review. Analysis of 29,000 public comments on the 2015 Committee's report found that 75 percent of the comments submitted were supporting recommendations tying nutrition with sustainability. However, the much weaker recommendations actually seen in the Dietary Guidelines report clearly show that in the current framework there is a scientific phase of the process followed by a political phase, and that in that latter phase industry interests displace rigorous science, as well as the interest of the public and other stakeholders.
Fourth, in the implementation phase of the 2015 Dietary Guidelines, as well as in the development of the next Guidelines, the public agencies involved should prioritize responsibility to the public at large. They should focus on highlighting the differential impacts of diet-related chronic disease on vulnerable populations, especially children, people of color, and low income individuals. We should also consider ways that the Dietary Guidelines can be disseminated and implemented to benefit those that are most vulnerable.

Fifth, for the 2020 Dietary Guidelines, the USDA should include experts to advise on the dietary needs of infants ages zero to 24 months, a crucial period for child development.

Lastly, there is an urgent need for the USDA to adopt a scientific integrity policy that will protect the Advisory Committee and agency scientists from political interference. The Committee plays such an important role in our
democracy by providing critical expertise to
policy makers and the American public. To fulfill
this responsibility, they must be able to
communicate clearly and freely with the media,
the public, and their peers. Last year, the Union
of Concerned Scientists evaluated 17 federal
agencies' media policies and practices, and we
concluded that the USDA's policies were some of
the weakest among all of the 17 agencies.
Therefore, we would encourage the USDA to create
a scientific integrity policy that will offer
agency scientists and the Advisory Committee
clear guidance and protections against any type
of political interference.

Thank you again for the opportunity to
comment today, and for the Dietary Guidelines
Advisory Committee's excellent scientific work.

MS. ROMERO: Thank you, Ms. Maslow.

Ms. Heimowitz.

MS. HEIMOWITZ: Good afternoon. My name
is Colette Heimowitz. I am Vice President of
Nutrition and Education in Atkins Nutritionals. I
have been with the company for 18 years. Before
joining Atkins, I was a practitioner for 10 years
directing patients' diet and exercise routine to
address their overweight conditions. It was
during that time that I gained a strong
understanding and an appreciation of the positive
clinical outcomes of a lower carbohydrate diet,
especially for people who are insulin-resistant,
pre-diabetic, or diabetic.

Today more than half of the American
population is either diabetic or pre-diabetic
according to the Journal of the American Medical
Association, yet the current U.S. Dietary
Guidelines is not meeting the needs of this
segment of the population. According to the CDC,
one in three Americans are obese, almost 70
percent are overweight, and this is precisely the
target population that a lower carbohydrate diet
can be effective for.

The cost of diabetes to the United
States economy is estimated to be $245 billion a
year in health care costs and lost wages, an
amount that is expected to double by the year 2020. We need to start the conversation on the impact of a high carbohydrate eating pattern to avoid the onset of the disease.

To insure that the Guidelines provide recommendations to all Americans, we need a greater diversity in the science advisory panel, inclusion in the emerging science surrounding low carbohydrate diets, and transparency in the Advisory Committee selection process. By mandating this diversity and inclusion of the most recent research it will insure that all of the science is considered and would enable a diverse group of experts to participate in the development of the recommendations. A lower carbohydrate recommendation is consistently omitted from the Guidelines even though during its 40 years with a low fat, high carbohydrate recommendation we've seen a strong increase in obesity and diabetes; yet, the science supporting low carbohydrate eating is overwhelmingly strong in the last two decades and support the safety
and efficacy, especially for people with metabolic syndrome and pre-diabetes.

None of the peer reviewed studies on low carbohydrate can be found in the National Education Library despite the fact that many of them were funded by the NIH, and met the inclusion criteria. There are 55 independent peer reviewed clinical trials that I know of in my brief look in the library reporting results of low carbohydrates that are missing, some comparing them to low fat, demonstrating that it's as good as, if slightly better than in some cases than low fat and should be a viable option in the consideration set before making recommendations in the future.

In addition, all of this research consistently demonstrated that individuals with metabolic syndrome, insulin-resistance, and Type 2 diabetes, all diseases from carbohydrates are likely to see symptomatic as well as objective improvements in biomarkers of disease risk. And for clarification, the low carbohydrate diet I am
referring to include carbohydrates in the form of nutrient-dense vegetables, low glycemic fruits, nuts, controlled portions of whole grains, legumes, and offer a wide range of beneficial nutrients giving them a healthy place in a lower carbohydrate diet. It also recommends a moderate level of protein, dietary protein of both animal and vegetable origin that preserves lean tissue and aids in satiety. Additionally, natural fats are a critical part for energy, essential body functions, and for satiety, as well.

We applaud the Guidelines that are focused on improving public health and wellness through better nutrition. However, the process for the development needs to be revised to insure that the mandate is clear. It should address the growing needs of the overweight pre-diabetic population and include a greater diversity of science in the NEL, in the science advisory panel. Again, thank you to allow me to provide some of my insights, and I look forward to continuing to be part of the ongoing dialogue.
MS. ROMERO: Thank you, Ms. Heimowitz.

Ms. Koch.

DR. KOCH: Hi, I'm Pamela Koch from the Laurie M. Tisch Center for Food, Education and Policy, Program and Nutrition, Teachers College Columbia University. I am honored for the opportunity to provide comments to help inform the 2020 to 2025 Dietary Guidelines for Americans. Thank you for the invitation.

Sometimes looking ahead means first looking back. In the foreword of the 1977 Report for the Dietary Goals for the United States, the late Senator George McGovern said, "The purpose of this report is to point out that the eating patterns of this century represent a critical public health concern as any now before us. We must acknowledge and recognize that the public is confused about what to eat to maximize health. If we as the government want to reduce health costs and maximize quality of life for all Americans, we have an obligation to provide practical guides to the individual consumer, as well as a set of
national dietary goals for the country as a whole. Such an effort is long overdue."

We have been making this effort through the Dietary Guidelines for Americans every five years since 1980, yet as the message from the Secretaries in the 2015 to 2020 Dietary Guidelines states we still have 117 million Americans that have one or more preventable chronic diseases, many of which are related to poor quality eating patterns and physical inactivity. We still have a critical public health concern, and sadly a lot of the public is still confused about what to eat to maximize health.

The science that needs to be reviewed for the 2020 to 2025 Guidelines needs to be broad. Since the first vitamins were discovered just a century ago, nutritional science has grown tremendously. This science is important to continue to review, especially to make recommendations for pregnant women, babies, and toddlers. We need to understand what dietary
patterns maximize brain development and minimize
risk for chronic disease; yet, we need to review
more important science.

As described in Guideline One of the
2015 Dietary Guidelines, we want people to
consume a nutritious diet that includes a variety
of vegetables, fruit, whole grains, some low fat
dairy and fat-free dairy, and some protein foods
including meat, poultry, seafood, legumes, nuts,
and seeds. We also want people to limit foods
that are high in certain nutrients, saturated
fats, trans fats, added sugar and sodium. This
includes processed snack foods, sweetened
beverages, and fast food. This basic message of
what to eat more of, and what to eat less of has
been consistent since the 1980 Dietary
Guidelines, and yet Americans are still far from
eating this -- far from this eating pattern.

The Healthy Eating Index, HEI,
measures how Americans are doing. In the 1999 to
2000 National Health and Nutrition Examination
Survey, NHANES, Americans were averaging 49.1 on
100 points HEI scale. By 2010 -- 2009 to 2010, NHANES data had moved up to 57.8. This is in the right direction but not far enough.

As discussed in the 2015 Dietary Guidelines Advisory Committee report, we need to review the science on social, economic, and cultural contexts in which people eat. This area is an area where research and evidence has expanded tremendously. To heed Senator McGovern's mandate to produce practical guides for consumers, understanding these determinants of behavior are essential to create dietary guidance that is communicated in simple to understand, practical, relevant, and motivational ways.

Third, in order for all Americans to be able to achieve healthy patterns promoted by the Dietary Guidelines we need to understand the disparities in food access across different communities, and how household food insecurity hinders ability to consume a nutritious diet. There is emerging scientific evidence about the serious and long-term consequences of food
insecurity, especially for children. There is also emerging scientific evidence on the effectiveness of multi-component programs to help all Americans be more food secure. Reviewing and using this scientific evidence will help all Americans be able to eat the right amount and right kinds of food.

And fourth, and this is the issue that caused a lot of controversy from the 2015 Dietary Guidelines Advisory Committee report, is sustainability of the food system. Stop for a minute and think, the babies born in 2020 will be 50-years old in 2070. We want them still to be able to eat well. There is scientific evidence that our planet will continue to warm over the decades and weather patterns will become more erratic. It is essential for our dietary guidance to consider how food production will change due to climate change, and what kind of dietary patterns to recommend so that people are eating in ways that will allow us to keep producing adequate nutritious food in the changing world.
MS. ROMERO: Thank you very much, Ms. Koch.

Ms. Kucinich.

MS. KUCINICH: Thank you. It's a pleasure to be here today. My name is Elizabeth Kucinich, and I offer these comments on behalf of the Plant-Based Foods Association, a new trade association representing the nation's leading plant-based food companies. A similar group of companies submitted comments regarding the 2015 Dietary Guidelines for Americans Committee report.

In looking forward, we wish to reaffirm many of the scientifically sound recommendations from that report, some of which unfortunately did not make it into the final version of the 2015 Dietary Guidelines. For example, we support the Advisory Committee's conclusion that the DGA should include a recommendation to limit red and processed meats. According to the World Cancer Research Fund, and most recently the World Health Organization, red
meats and processed meats increase the risk of
certain cancers. That's why the American Cancer
Society, among other health organizations,
recommends limiting consumption of red and
processed meats. The failure to include a clear
recommendation in the DGA to reduce red meat does
a serious disservice to the American people and
their health. We are hopeful that the 2020
version of the DGA will accurately reflect the
science to include this recommendation.

The DGA should also make stronger
recommendations regarding consuming healthier
plant-based protein sources, such as legumes, soy
foods, seeds, and nuts, especially in place of
red and processed meats. Major health
organizations are already supporting
recommendations for plant proteins. For example,
the American Cancer Society emphasizes a diet
based on plant foods.

Moreover, plant-based diets can help
solve the nation's nutrient deficiencies.
America's population is overfed and under-
nourished; 85 percent of Americans do not get
sufficient vitamins and minerals required for
healthy functioning minds and bodies. The
majority of nutrients of concern for under-
consumption are found primarily in plant foods.
And increasing vegetables, fruits, legumes, whole
grains, nuts, and seeds will help to solve this
problem.

Plant-based foods also tend to be high
in fiber, vitamins, and minerals, and low in
saturated fat and cholesterol in contrast to
animal-based products which tend to be high in
saturated fat and cholesterol, and low in fiber.

Finally, we wholeheartedly endorse the
2015 Committee's recognition of sustainability as
an essential component of federal dietary
guidance. Simply put, how food production impacts
our limited natural resources is critical to the
nation's health and food security.

In sum, we were disappointed that the
DGA did not include the Advisory Committee's
quite specific and clear conclusion that a diet
high in plant-based foods such as vegetables, fruits, whole grains, legumes, nuts, and seeds and low in calories and animal-based foods is more health promoting and is associated with less environmental impacts than is the current U.S. diet. This is the type of science-based guidance that the American public needs from the DGA. You also asked about the process for Committee selection. It's vitally important that members are free of conflicts of interest, and in the past we have seen how members with ties to certain sectors of the food industry can bias the review process. Ironically, despite the controversy over the recent Advisory report, the 2015 Committee was relatively free of such conflicts. The problem in process of the 2015 were not with the Committee members, nor with members of scientific review, but with politics. Concerns over science was used as a smoke screen by some who have vested interest in the outcome. We hope that going forward for 2020 and beyond
the science that clearly demonstrates the need to shift away from eating animal food such as red meat and towards more plant-based foods trumps the politics we saw in 2015.

Thank you for the opportunity to comment on this important matter, and we look forward to working together on the common goal of improving America's health. Thank you.

MS. ROMERO: Thank you, Ms. Kucinich.

Ms. Teicholz.

MS. TEICHOLZ: My name is Nina Teicholz. I'm here -- I'm a scientist journalists and a member of the Nutrition Coalition, and I thank you very much for the opportunity to speak today. I'm speaking on behalf of the Nutrition Coalition, a fledgling group of doctors, Ph.D.s and others not backed by any industry who want to be sure that nutrition policy is based on a rigorous and comprehensive review of the science in the interest of the public health. We don't endorse any particular diet.

The problem that we might agree upon
today is that the Guidelines have been unable
over the past 35 years to effectively combat
obesity, diabetes, and other nutrition-related
diseases. Several explanations are usually given
for this conundrum. One is that Americans don't
adequately follow the DGAs; yet, this explanation
is contradicted by USDA data showing that the
public has on the whole been compliant.

A second explanation for why the
Guidelines have failed is that Americans simply
eat too much, calorie consumption has risen. This
is a possible explanation; yet, the evidence is
unclear. A large body of evidence now shows that
the human body does not respond to all types of
calories equally, and that the over-consumption
of carbohydrates because they stimulate insulin
production might be uniquely fattening, as well
as contribute to diabetes.

In the U.S. because the increase in
per capita calorie consumption in recent decades
has come almost entirely from carbohydrates, it
is impossible to disentangle whether it's the
increased calories or the increased carbohydrates that might have been responsible for growing obesity.

A third explanation for obesity and diabetes rates today is that junk food alone is to blame; yet, in the last 15 years Americans have cut their consumption of sugar and refined carbohydrates which are the best available proxies for junk food consumption, while the rates of obesity and diabetes have not abated.

An alternative explanation for the problem of nutrition-related diseases is that the Guidelines recommendations themselves are somehow flawed, or that the advice only works in a minority of the population. There's only time to touch on a few issues today, but an important one is the use of the Nutrition Evidence Library, or NEL, which undergirds all the Guidelines.

It is problematic that the NEL is not consistently used by the Committee on several peer reviews in 2015, including the one on saturated fats that NEL was not consulted. A
larger problem, however, is that the NEL is incomplete. In fact, I think it's safe to say that does not include a majority of the scientific literature on nutrition and disease. Remember that the National Heart, Lung, and Blood Institute and its predecessor agency have since 1948 been virtually obsessed with the hypothesis that a fat of some kind of amount causes heart disease and has spent billions of dollars trying to get an answer. What has happened to that research? Unsaturated fats, for instance, there have been huge clinical trials, several funded by the NIH, conducted on all together 75,655 men and women in experiments lasting one to 12 years. None of these are in the NEL. The major epidemiological trials on saturated fats from the 1960s and '70s on tens of thousands of people are also missing.

Moreover, in the last five years there's been a seat change in the thinking on saturated fats with at least 13 major meta analyses and systematic reviews, several of which
received NIH funding, and most of those are also missing from the NEL. The low fat diet is another recommendation that has been studied extensively in a half dozen NIH-funded multi-center clinical trials on all together more than 57,000 men and women in experiments lasting one to eight years. From those studies, 13 publications reported the major results, only one of which is in the NEL.

Possibly because those trials did not show any benefit of a low fat diet for health, Guidelines Advisory Committees since 2010 have backed off from any low fat language. We've been advised to eat a low fat diet for decades now, and if that is no longer the recommendation, then I believe funds should be spent to re-educate the public.

Furthermore, in a brief search we found that there are more than 58 papers on the low carbohydrate diets that are not in the NEL. It seems worth questioning, therefore, if there should be an NEL, why should reviews not take place simply by searching the major electronic
databases such as PubMed directly which is the
standard method for scientific reviews. The
process of admitting studies into the NEL
introduces the possibility of bias, and clearly
has led to major deficiencies.

There's an additional problem in the
2015 Committee's report in that it made
recommendations based on weak or inconclusive
evidence. The vegetarian diet is one such
recommendation, and although the Committee
recommended eating lean meat and reducing red and
processed meats, it did not do any comprehensive
review of the science on those topics. The
Committee looked at data in which the category of
meat was mixed together with eggs and dairy.

The over-reliance of the Guidelines on
epidemiological data which can only show
association but not causation is a crucial issue
and a problem with the Guidelines. The case for
using epidemiology has been made in instances
where clinical trial data are lacking, but as
described above in this instance there are
numerous clinical trials that have been conducted. They've simply been ignored or forgotten. These studies clearly need to be entered into the record and properly prioritized as more rigorous kind of evidence.

The lack of nutritional sufficiency is also an urgent problem for the Guidelines. Preliminary modeling has shown that this problem can be eliminated by listing the caps on saturated fat since many of the borderline nutrients are found in animal foods. I'm sorry.

MS. ROMERO: Thank you.

MS. TEICHOLZ: Thank you very much for having the opportunity to comment.

MS. ROMERO: Thank you. On behalf of USDA thank you for participating in this Listening Session. Following today's session, USDA is going to provide an unedited transcript to the IOM prior to their initiation of the comprehensive study of the Dietary Guidelines development process. USDA encourages you to stay in contact with the IOM once it begins the study.
We must leave the room immediately after this meeting, and as you exit the Williamsburg Room, please drop off your written comments to Susan so that in case anything was missed, we actually have that as part of the transcript. And please stop at the security desk to return your badge, visitor badge. Thank you very much.

(Whereupon, the above-entitled matter was concluded at 4:05 p.m.)
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CERTIFICATE

This is to certify that the foregoing transcript

In the matter of: Dietary Guidelines for Americans Listening Sessions

Before: USDA

Date: 02-19-16

Place: Washington, DC

was duly recorded and accurately transcribed under my direction; further, that said transcript is a true and accurate record of the proceedings.

[Signature]

Court Reporter