

Appendix E-5: Public Comments

As a government advisory panel, the Dietary Guidelines Advisory Committee (DGAC) is required by the Federal Advisory Committee Act (FACA) to conduct an open process in which the public may participate. The public does this through submitting written and oral comments to the Committee.

The first public comment was submitted to the public comments database on October 17, 2008. Thereafter, the Committee received written comments from the public continuously and at a steady pace throughout their deliberations. Comment submissions increased noticeably in response to each call for public comments. These calls were released through six Federal Register notices announcing upcoming public DGAC meetings.

Comment submissions were collected through a newly developed electronic database designed for this purpose and located at www.dietaryguidelines.gov. The motivation for developing this database was to help reduce the burden on the public for submitting comments, especially cumbersome paper submissions; to provide a central place for storing all comments; to allow continual public access to all comments; and to allow the DGAC to have full access to comments and accompanying reports, research, and other support material. This database is the most efficient, open, and transparent public comment collection system to date.

Each comment submitted to the database was categorized within one or more of 14 key topic areas. This allowed anyone interested in a particular topic to efficiently navigate to the selected topic area and view comments assigned to that section without having to spend time combing through all the comments. A query function on this “filing” system also allowed staff to generate topic-specific reports of public comments for various time periods. This report feature proved valuable for the DGAC members, who could easily access and review comments about a certain key topic area that pertained to their subcommittee’s work.

The 14 topic areas were: alcoholic beverages, carbohydrates, eating patterns, energy balance/physical activity, evidence-based review process, fats, fluids and electrolytes, food groups, food safety, minerals, nutrient density/discretionary calories, protein, vitamins, and “other.” Most of these key topic areas were further categorized into subtopics. For example, under carbohydrates, additional category selections included added sugars, fiber, whole grains, glycemic index, and low carbohydrates. This function allowed staff to generate reports on specific issues within topic areas.

Although comments could be submitted continually, each Federal Register notice announcing an upcoming DGAC public meeting included a final date for comment submissions. This ensured timely transmission of comments to the DGAC before the meeting. In general, the ending submission date was set at close of business 6 calendar days before each DGAC meeting date. This

allowed all comments to be posted and comment reports to be generated and sent to Committee members with sufficient time for comments to be reviewed before the meeting. Comments that were submitted later than the time specified in the Federal Register notice were considered by the Committee for the following public meeting date. Public comment reports by key topic area were made available to Committee members before each DGAC meeting and more frequently during the large time spans between the third and fourth DGAC meeting and the fourth and fifth DGAC meeting. Comment submission for the sixth meeting ended 13 days before the May 12, 2010 meeting because the Committee needed additional time to consider the comments before completing their chapters for their DGAC Report.

When organizations or individuals submitted comments to the electronic database, they were required to complete three fields—organization type, key topic, and summary comment. Comments could not exceed 2,000 characters. Other fields were optional. Submitters also were able to upload an attachment for comments that exceeded 2,000 characters or for other support material the submitter desired to share with the Committee. Disclaimers were posted in multiple places alerting the submitter to heed copyright laws.

A small team of staff reviewed each comment submission. Comments that were offensive in nature were not posted. Comments that were inappropriately categorized in a key topic area(s) were correctly categorized. Duplicate submissions that were obvious errors in the submission process also were not posted. Of the nearly 1,000 comments received over the 1½ year DGAC period, 774 comments were posted. Of these comments, large numbers addressed food groups and eating patterns, specifically plant-based diets and a focus on the total diet approach. Many comments suggested that the Dietary Guidelines emphasize physical activity and energy balance, and that they should focus on calorie density, weight, and the impact of obesity on health. Examples of other comments included those on sugar, sodium, potassium, fats, individual vitamins and minerals, and offered suggestions for best food safety practices, ways to communicate the guidelines, and how messages could affect policy. All public comments will continue to be available on the Dietary Guidelines website at www.dietaryguidelines.gov.

In addition to written comments, oral comments were solicited; 51 of the 58 organizations or individuals who registered to present oral testimony, delivered 3-minute presentations on the first day of the second DGAC meeting, which was held January 29-30, 2009. These comments are summarized in the January Public Meeting Minutes found at www.dietaryguidelines.gov.

All of the oral and written comments provided by the public were valuable in that they helped the Committee gather background information and understand consumer perceptions. They also highlighted and ensured consideration of topics deemed to be important by the submitters of comments from a variety of backgrounds and focus areas.