

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001051

Submission Date: 06/18/2010

Organization Type: Educational Institution

Organization Name: Charleston Area Medical Center

First Name: Susan

Last Name: Poindexter

Job Title: Nutrition and Diabetes Educator

Key Topic: Alcoholic Beverages, Carbohydrates, Energy Balance/Physical Activity, Fats

Sub Topic: Glycemic index, Saturated fatty acids, Trans fatty acids, Weight loss, Whole grains

Attachment: N

Comment: Stronger advice warranted against use of alcohol.
Stronger advice to use carbohydrate containing food as close as possible to natural state - i.e. whole grains, un sugared fruits, vegetables.
Stronger advice to avoid trans fat.
Stronger encouragement of plant based diet.
Stronger recommendation to make all grains consumed whole grains.
Stronger message to eat less, move more.

Comment ID: 001315

Submission Date: 07/01/2010

Organization Type: Educational Institution

Organization Name: State University of New York at Geneseo

First Name: Wendy

Last Name: Pogozeleski

Job Title: Professor of Biochemistry

Key Topic: Carbohydrates, Evidence-based Review Process, Fats

Sub Topic: Low carbohydrate, Oils, Unsaturated fatty acids, Saturated fatty acids

Attachment: N

Comment: The guidelines are wrong in three respects: 1) They don't consider that total carbohydrate intake can drive obesity, regardless of whether those carbohydrates come from sugar or whole grains. 2) They treat all populations the same, when children and type 1 and type 2 diabetics have much different needs. 3) They don't reflect the latest research showing the benefits of good fats and the dangers of fat restriction in children. I fear that schools and states will use these new guidelines, with the result that they will continue to INCREASE obesity, behavior problems, and diabetes in the most vulnerable populations. I recommend adding a caveat that children need fat and that the 20 million diabetics in this country need to monitor carbs closely.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001953

Submission Date: 07/15/2010

Organization Type: Educational Institution

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Carbohydrates, Fats

Sub Topic: Cholesterol, Low carbohydrate

Attachment: Y

Comment: Ancel Keys's Seven Country Study, which has been used as the basis of our low fat diet, did NOT prove that fat, especially saturated fat, was associated with heart disease. Only one food was positively correlated with heart disease across all of the countries he studied, and that was SUGAR! All carbohydrates are metabolized like sugar. If we do not eat fat, we will die. If we do not eat protein, we will die. If we do not eat carbohydrates, we will live. Please ask any scientist to confirm this fact. Reducing fat is detrimental to our health.

I have lost 26 pounds on a high fat, low carb diet, and am off my blood pressure meds. I feel fine, and my total cholesterol measurement has gone down, not up. I eat NO fruit, NO root vegetables, NO grain. And I am 69 years old and very healthy now.

Archeologists will tell you that the onset of osteoporosis and tooth decay were not detected until after the domestication of grains. What we need to eliminate or reduce in our diets is grain, not fat.

The new dietary guidelines must follow science, not "groupthink," and properly address the damage that our low fat diets have done to our health over the past several decades.

Comment ID: 002074

Submission Date: 07/15/2010

Organization Type: Educational Institution

Organization Name: Harvard School of Public Health

First Name: Walter

Last Name: Willett, MD, DrPH

Job Title: Chair, Dept of Nutrition; Fredrick John Stare Professor of Epidemiology and Nutrition

Key Topic: Carbohydrates, Fats, Food Groups, Minerals, Other, Vitamins

Sub Topic: Added sugars, B Vitamins, Calcium, Folate, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vitamin D, Whole grains

Attachment: Y

Comment: The report has made positive changes but has some shortcomings (see attachment). Positive changes: stronger recommendation to reduce sugary beverages; greater emphasis

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Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

on sodium reduction; and much less emphasis on the percentage of energy from total fat, which is correctly described as not related to weight gain, obesity, or any other major health outcome. Shortcomings: (1) Total fat is still recommended to be less than 35% of calories, and there is no basis for setting an upper limit on total fat. (2) The recommendation for three servings of milk per day is not justified and is likely to cause harm to some people. Prospective studies and randomized trials have consistently shown no relation between milk intake and fracture risk, yet many studies have shown a relation between high milk intake and risk of fatal or metastatic prostate cancer. (3) The recommendation for high intake of lean meat is worrisome: There is substantial evidence that high heme iron intake may increase diabetes risk; red meat consumption has been associated with incidence of colorectal cancer; and there is some data that red meat consumption during adolescence and early adult life is associated with higher risks of premenopausal breast cancer in women. (4) The report seems relatively silent on vitamin D, even though there is strong evidence that blood levels are not optimal for 2/3 of Americans. Vitamin D supplementation is probably the safest way to increase levels, and it has been shown to reduce risk of fractures in randomized trials if the dose is 700 IU per day or more. (5) The report does not reinforce adequately the CDC recommendation that women of reproductive age who might possibly become pregnant should take a supplement of folic acid, which is most conveniently done as part a multiple vitamin. (6) The report still suggests that having half of grains as refined grains is healthy. Refined grains have adverse metabolic effects and provide many empty calories and minimal benefits.

Comment ID: 002076

Submission Date: 07/15/2010

Organization Type: Educational Institution

Organization Name: Harvard School of Public Health

First Name: Meir

Last Name: Stampfer, MD, DrPH

Job Title: Professor of Nutrition and Epidemiology

Key Topic: Carbohydrates, Fats, Food Groups, Minerals, Vitamins

Sub Topic: Added sugars, B Vitamins, Calcium, Folate, Grains, Whole grains, Iron, Meat, Beans, Eggs, Fish, and Nuts, Milk, Other, Sodium, Vitamin D, Whole grains

Attachment: Y

Comment: The report has made positive changes but has some shortcomings (see attachment). Positive changes: stronger recommendation to reduce sugary beverages; greater emphasis on sodium reduction; and much less emphasis on the percentage of energy from total fat, which is correctly described as not related to weight gain, obesity, or any other major health outcome. Shortcomings: (1) Total fat is still recommended to be less than 35% of calories, and there is no basis for setting an upper limit on total fat. (2) The recommendation for three servings of milk per day is not justified and is likely to cause harm to some people. Prospective studies and randomized trials have consistently shown no relation between milk intake and fracture risk, yet many studies have shown a relation between high milk intake and risk of fatal or metastatic prostate cancer. (3) The recommendation for high intake of lean meat is worrisome: There is substantial evidence that high heme iron intake may increase diabetes risk; red meat consumption has been associated with incidence of colorectal cancer; and there is some data that red meat consumption during adolescence and early adult life is associated with higher risks of premenopausal breast cancer in women. (4) The report seems relatively silent on vitamin D, even though there is strong evidence that blood levels are not optimal for 2/3 of Americans. Vitamin D supplementation is probably the safest way to increase levels, and it has been shown to reduce risk of fractures in randomized trials if the dose is 700 IU per day or more. (5) The report does not reinforce adequately the CDC recommendation that women of reproductive age who might possibly become pregnant should take a supplement of folic acid, which is most conveniently done as part a multiple vitamin. (6) The report still suggests that having half of grains as refined grains is healthy. Refined grains have adverse metabolic effects and provide many empty calories and minimal benefits.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 002101

Submission Date: 07/15/2010

Organization Type: Educational Institution

Organization Name: Cornell University Cooperative Extension

First Name: Sonya

Last Name: Islam

Job Title: Extension Associate

Key Topic: Energy Balance/Physical Activity, Fats, Fluid and Electrolytes, Nutrient Density/Discretionary Calc, Other

Sub Topic: Oils, Unsaturated fatty acids, Sodium, Trans fatty acids, Weight loss, Weight maintenance

Attachment: Y

Comment: The comments provided are with regards to the areas of creating healthy environments for children, breastfeeding, sodium recommendations, fatty acid recommendations, and the maximal intake of daily calories from added sugar.

Comment ID: 002033

Submission Date: 07/15/2010

Organization Type: Educational Institution

Organization Name: Wayne State University

First Name: Pramod

Last Name: Khosla

Job Title: Associate Professor

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: pls see attached

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001812

Submission Date: 07/13/2010

Organization Type: Educational Institution

Organization Name: Brandeis University

First Name: KC

Last Name: Hayes

Job Title: Prof Biology (Nutr)

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: The proposed USDA Dietary Guidelines carry the implicit notion that stearic acid (18:0) could be construed as "neutral" in terms of its impact on serum cholesterol, and thus could be considered a non-saturated fatty acid. Although evidence does exist that this may apply to 18:0 from most natural fats, where it resides in the sn 1,3 position, it does NOT apply to fats modified by interesterification (IE), where 18:0 is randomly inserted on the glycerol backbone with 1/3 resting in the sn2 position. Thus, an allowance for 18:0 as "neutral" based on its performance in NATURAL fats would be big mistake once it was incorporated into oils, because IE would be used to harden fats indiscriminately and soon could have the distribution and consumption levels reminiscent of trans fat, even more if used to replace other saturated fats. Sufficient evidence exists that high intakes of IE fats are not without serious consequence to lipid metabolism and immune function, at the very least increasing LDL and particularly decreasing HDL, a response similar to trans fatty acid consumption.

Thus, stearic acid should remain among the class of saturated fatty acids and caution should be exercised, and more research conducted on its safety when consumed as IE fats, before it becomes the major replacement fatty acid for trans fatty acids in the form of interesterified fats.

Comment ID: 001814

Submission Date: 07/13/2010

Organization Type: Educational Institution

Organization Name:

First Name: KC

Last Name: Hayes

Job Title: Prof Biology (Nutr)

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: The proposed USDA Dietary Guidelines carry the implicit notion that stearic acid (18:0) could be construed as "neutral" in terms of its impact on serum cholesterol, and thus could be considered a non-saturated fatty acid. Although evidence does exist that this may apply to 18:0 from most natural fats, where it resides in the sn 1,3 position, it does

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Key Topic: Fats

NOT apply to fats modified by interesterification (IE), where 18:0 is randomly inserted on the glycerol backbone with 1/3 resting in the sn2 position. Thus, an allowance for 18:0 as ?neutral? based on its performance in NATURAL fats would be big mistake once it was incorporated into oils, because IE would be used to harden fats indiscriminately and soon could have the distribution and consumption levels reminiscent of trans fat, even more if used to replace other saturated fats. Sufficient evidence exists that high intakes of IE fats are not without serious consequence to lipid metabolism and immune function, at the very least increasing LDL and particularly decreasing HDL, a response similar to trans fatty acid consumption.

Thus, stearic acid should remain among the class of saturated fatty acids and caution should be exercised, and more research conducted on its safety when consumed as IE fats, before it becomes the major replacement fatty acid for trans fatty acids in the form of interesterified fats.

The following Power Point slides support the prior written material.

Comment ID: 001857

Submission Date: 07/14/2010

Organization Type: Educational Institution

Organization Name: Wayne State University

First Name: Pramod

Last Name: Khosla

Job Title: Associate Professor

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: Part of this pas presented as oral testimony

Comment ID: 001376

Submission Date: 07/07/2010

Organization Type: Educational Institution

Organization Name: VU University Amsterdam, Dept of Health Sciences

First Name: Martijn

Last Name: Katan

Job Title: National Academy Professor

Key Topic: Fats

Sub Topic: Trans fatty acids

Attachment: Y

Comment: My comments refer to my specialty, trans fatty acids (TFA). The Executive Summary (p. A6) states: ?Beneficial changes also include avoiding trans fatty acids from industrial

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Key Topic: Fats

sources [..], leaving small amounts (<0.5% of calories) from trans fatty acids from natural (ruminant) sources?. The Guidelines thus recommend to leave intake of ruminant TFA from dairy and meat largely unchanged, because mean US intake is 1.2 g/d or 0.5% of calories. I suggest setting a lower target for ruminant TFA. Indeed, Part D, section 3, p 28 says: "The very limited data available provide insufficient evidence to suggest r[uminant]TFA and i[n]dustrialTFA be considered differently in their metabolic effects. Total trans fatty acid intake should be considered the target for dietary change."

New evidence suggests that the effects of ruminant TFA on blood lipids are largely the same as those of industrial TFA: they lower HDL and raise LDL (Brouwer IA et al. Effect of animal and industrial trans fatty acids on HDL and LDL cholesterol levels in humans--a quantitative review. PLoS One. 2010 <http://dx.plos.org/10.1371/journal.pone.0009434>). This supports the recommendation that total trans fatty acid intake should be the target for dietary change.

However, p. D3-28 objects: "Total elimination of rTFA would require elimination of red meat and dairy products from the diet?. In fact, ruminant TFA can largely be eliminated by switching to low-fat milk and lean meat, because the TFA are in the fat.. This also reduces saturated fat and calorie intake. Reduction of ruminant TFA favorably affects LDL and HDL, provides an added incentive to reduce fats from dairy and meat, and provides the nutrients from milk and meat in a more nutrient-dense form.

The present Summary implies that intake of ruminant trans fatty acids does not need to be reduced. I suggest instead to set a target for ruminant TFA of <0.3%. This is commensurate with their adverse effects on LDL and HDL, and with recommendations elsewhere in the report to reduce fat from milk and meat.

Comment ID: 001189

Submission Date: 06/24/2010

Organization Type: Educational Institution

Organization Name: WAPF

First Name: Rebecca

Last Name: Baker

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: "The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources," explains Fallon Morell.

"The revised Guidelines recommend even more stringent reductions in animal fats and cholesterol than previous versions," says Fallon Morell, "and are tantamount to rearranging the deck chairs on the Titanic. While the ship of state sinks under the weight of a crippling health care burden, the Committee members are giving us more of the same disastrous advice. These are unscientific and grossly deficient dietary recommendations."

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001211

Submission Date: 06/24/2010

Organization Type: Educational Institution

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: Where is your valid research that saturated fat and cholesterol intake leads to heart disease. Studes funded and "tweeked" by the soy and vegetable oil industry no doubt. Or perhaps the grain industries..or better yet pharmaceuticals!

We need saturated fat and cholesterol to be well.
There is enough research that demonstates this.
Why are you missing it? Someone from the above mentioned industries at your doors?

Look at other countries..Those who eat lots of saturated fats, no margerine...no vegetable oils..have no heart disease.

CAN YOU BREAK YOUR MOLD? YOU ARE KILLING US. OBVIOUSLY WHAT ADA AND FDA ARE DOING IS NOT WORKING. WE ARE A SICK POPULATION. SICKER THAN EVER...AND HAVING SICK BABIES AND CHILDREN. PLEASE STOP AND MOVE OUTSIDE OF THE ADA, AMA AND OTHER FOR PROFIT COMPANIES FOR YOUR INSIGHT

Comment ID: 001093

Submission Date: 06/23/2010

Organization Type: Educational Institution

Organization Name: Metabolic Education Center

First Name: Bruce

Last Name: Anderson

Job Title: CEO

Key Topic: Fats

Sub Topic: Cholesterol, Oils, Unsaturated fatty acids, Saturated fatty acids

Attachment: N

Comment: When will the USDA face facts. The biggest increase in fat consumption in last 70 years has been for polyunsaturated fats. This correlates with chronic disease rise now

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

epidemic. Humans evolved around saturated fats and we have demonized them with statistical observations, not with science. The human digestion and use of saturated fat is known by true scientists in the field. STOP THIS MINDLESS COUNSEL AGAINST SATURATED FATS BASED ON STATISTICAL CORRELATIONS AND IGNORE THE EDIBLE OIL LOBBY. GLAD TO GIVE YOU PROOF.

Comment ID: 001956

Submission Date: 07/15/2010

Organization Type: Educational Institution

Organization Name: Penn State University

First Name: Penny

Last Name: Kris-Etherton

Job Title: Distinguished Professor of Nutrition

Key Topic: Fats, Food Groups

Sub Topic: Milk, Saturated fatty acids

Attachment: Y

Comment: See my attached letter about the role of reduced-fat cheese in a healthy diet.

Comment ID: 000998

Submission Date: 06/16/2010

Organization Type: Federal Agency

Organization Name: U. S. Navy

First Name: Linda

Last Name: Hite

Job Title: Dietitian

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: N

Comment: The discussion re: omega 3 fats is a bit confusing. You suggest 2- 4 oz servings a week but then describe it in terms of 250mg/day of DHA and EPA.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001274

Submission Date: 06/28/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Eric

Last Name: Esterling

Job Title: Registered Dietitian

Key Topic: Carbohydrates, Eating Patterns, Fats

Sub Topic:

Attachment: N

Comment: Please search for "half of grains" and assure each instance correctly states "at least half of grains." For example, page E-1 correctly states: "at least half of all refined grains should be replaced ..." Unfortunately, page B2-8 wrongly states: "... to meet the recommendation that half of grains consumed be whole grains."

Shift the emphasis from dietary cholesterol as a CVD risk factor to refined carbohydrate. Page A-6 declares: "Intakes of dietary fatty acids and cholesterol are major determinants of CVD and T2D..." On page A-6, change "cholesterol" to the more appropriate "refined carbohydrates."

The literature is clear that cholesterol does not have the same level of effect as dietary fatty acids. The details on page D3-18, question 2, regarding "the Effect of Dietary Cholesterol" focus almost entirely on cholesterol from eggs. There is no discussion of cholesterol from shellfish. In their review, Kreisberg and Oberman said, "Sterols in shellfish and shrimp do not appreciably influence the serum cholesterol unless fried, cooked in butter, or consumed in large quantities." They also state that cholesterol is not as important as saturated fat. (Kreisberg RA, Oberman A. Medical Management of Hyperlipidemia/Dyslipidemia. The Journal of Clinical Endocrinology & Metabolism 88: 2445-2461.)

On the other hand, reasonably strong evidence suggests refined carbohydrates warrant the same attention as fat intake for CVD and T2D. (Among others: Jakobsen MU, Dethlefsen C, et al. Intake of carbohydrates compared with intake of saturated fatty acids and risk of myocardial infarction: importance of the glycemc index. Am J Clin Nutr. 2010 June;91(6):1764-1768).

Page A-4 makes the excellent recommendation to: "Increase environmentally sustainable production of vegetables, fruits, and fiber-rich whole grains." I hope this is followed through into moving subsidies from corn and soy to more local fruit and vegetable providers. Schools, home delivered meals, and farmers would benefit from more commodity availability of whole grains, fresh fruits, and vegetables. Unfortunately, I did not find any follow up to this recommendation.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 000985

Submission Date: 06/15/2010

Organization Type: Individual/Professional

Organization Name: KUB Consulting

First Name: Karl

Last Name: Bucus

Job Title: Consultant

Key Topic: Carbohydrates, Evidence-based Review Process, Fats

Sub Topic: Added sugars, Cholesterol, Low carbohydrate, Saturated fatty acids

Attachment: N

Comment: Reading the preliminary recommendations one is left wondering if any of the participants were even aware of the January 2010 meta-analysis study in The American Journal of Clinical Nutrition regarding heart disease and saturated fat. These findings may contravene conventional wisdom, but they certainly should be acknowledged, and low-carb alternatives should be entertained in a more serious way.

Also, fat intake is implicated in the preliminary recommendations in regards to T2D. There is no literature at all implicating fat with T2D.

I am in the best shape of my life, at 38, vis a vis fitness, weight, blood pressure, the whole magilla. I did it by pretty much doing the opposite of these recommendations. While this is merely anecdotal, I do not think I am some sort of genetic freak. Furthermore, the scientific literature on an almost monthly basis provides evidence suggesting my diet-- high in protein and plants, low on starches and sugars-- is potentially optimal for the human physiology.

Given this it is, frankly, shocking these new recommendations will potentially be functionally identical to the old ones. Given the continued problems presented by CHD and T2D one imagines a different approach would be in order.

Comment ID: 000973

Submission Date: 06/15/2010

Organization Type: Individual/Professional

Organization Name:

First Name: David

Last Name: Getoff

Job Title: Board Certified Clinical Nutritionist and Educator

Key Topic: Carbohydrates, Fats

Sub Topic: Added sugars, Cholesterol, Low carbohydrate, Saturated fatty acids

Attachment: N

Comment: Once again both science and clinical evidence is ignored in preference to industry?s desires. A failed set of recommendations gets continued as the population gets sicker and

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Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

fatter. Every individual (and physician and researcher) who has utilized the very low starch, very low sugar diet, has seen its health benefits. This is equally true for those who have used and/or put patients on a diet high in healthy natural fats, including saturated fats, such as butter, coconut oil, whole eggs, nuts avocados, beef, chicken with its skin, etc. The FACT that these diets REDUCE heart disease, obesity, diabetes, cancer, and emotional problems in children, continues to be ignored in favor of concepts which DO NOT WORK but make gobs of money for industry. It is extremely sad that we continue to have a government which cow tows to pressure from the wealthy minority of big business rather than to the good of the people. I hope I live long enough (200 maybe) To be here when all of this nonsense tumbles in favor of facts and the welfare of our citizens. David Getoff, CCN, CTN, FAAIM

Comment ID: 001031

Submission Date: 06/17/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Barrie

Last Name: Platt

Job Title:

Key Topic: Carbohydrates, Fats

Sub Topic: Low carbohydrate, Saturated fatty acids

Attachment: N

Comment: It appears that your recommendations are not much different from those issued thirty years ago. This model - which promotes a low fat diet high in complex carbohydrates - has led to a substantial decline in the percentage of energy intake from total and saturated fats in the United States. At the same time, it has spurred an increase in the consumption of refined carbohydrates and added sugars? a dietary shift that is clearly responsible for the current epidemics of obesity and diabetes.

Carbohydrates are traditionally classified as simple or complex, with complex a healthier alternative. However, many complex carbohydrates produce even higher glycemic responses than do simple sugars. Therefore, the term "complex carbohydrates" is not useful in characterizing the quality of carbohydrates. More useful indicators of carbohydrate quality are fiber content and the type and the extent of processing. Highly refined carbs are the enemy.

Clearly, we must shift the focus of our dietary guidelines from encouraging restricted fat intake and toward encouraging restricted consumption of carbohydrates, especially refined carbs.

You state, "The macronutrient distribution of a person's diet is not the driving force behind the current obesity epidemic." This conclusion is not based on sound principles of science and nutrition. It is based on dietary myths that have been perpetrated over the last 30 years.

The long-time position of "grains" at the base of the pyramid is due largely to food industry influence. The base of the pyramid should be "fruits and vegetables", followed by protein sources, then fats, with the smallest portion being real whole grains and very minimal sugars.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001062

Submission Date: 06/21/2010

Organization Type: Individual/Professional

Organization Name:

First Name: C

Last Name: Tobin

Job Title: RN

Key Topic: Carbohydrates, Fats

Sub Topic: Added sugars, Cholesterol, Low carbohydrate, Trans fatty acids

Attachment: N

Comment: In light of the increasing evidence that carbohydrates, especially refined carbohydrates like added sugars, white flour, white rice, and most processed foods are harmful, and have helped contribute to the increase in heart disease, diabetes, cancer, Alzheimer's and other diseases, it is surprising that the USDA continues to recommend a high-carbohydrate diet.

6-11 servings of carbohydrate/day is enough to require diabetics to be on insulin and medications. It is enough to cause several pounds a year of weight gain. It increases triglycerides, lowers good HDL cholesterol, raises blood sugar and causes inflammation. On the other hand, more and more evidence is being uncovered that fats, including saturated fats, are benign and even healthy, particularly in the absence of carbohydrate.

Advocating a low carbohydrate diet - that is a diet based primarily on healthy fruits, vegetables, and safely raised meats, would do much more to enhance the health of our population. Dramatically reducing the average person's consumption of carbohydrates (which could easily be accomplished if we were to lose our superstitious fear of fat) would lead to vast improvements in health, and a dramatic reduction in the demands on our already strained healthcare system.

Comment ID: 001080

Submission Date: 06/22/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Gale

Last Name: Erdmann

Job Title: retired physical therapist

Key Topic: Carbohydrates, Fats

Sub Topic:

Attachment: N

Comment: We have been under guidelines for thirty years that stress low fat but say nothing about low carbohydrate. And we are fatter than we have even been! In truth, a moderately-high fat diet is healthy, in stark contrast to a diet with sugars in any form and white foods such as flour, breads, potatoes, white rice, etc. Please read the reams of compelling research

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on low-carbohydrate versus low fat diets and encourage the American people to drop the sugars/starches (no matter what the wheat and sugar farmers say, or how much they donate) and go for protein and vegetables, fats and SOME fruit. Then look in another 30 years at the people who have followed your guidelines and see how healthy they are. And slim. It is hard to admit you've been wrong, but it is a sign of strength.

Comment ID: 001330

Submission Date: 07/01/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Markell

Last Name: Lewis

Job Title: Public Health Nutrition Student

Key Topic: Carbohydrates, Fats

Sub Topic: Added sugars, Saturated fatty acids

Attachment: N

Comment: I commend the Dietary Guidelines Advisory Committee for including recommendations to "Avoid Sugar Sweetened Beverages" and strongly encourage you to include these recommendations in the final version of the Dietary Guidelines. Dietary Guidelines should state recommendations in terms of foods, not nutrients. Dietary Guidelines should specifically name foods high in saturated fat and/or trans fats that should be limited in consumption.

Comment ID: 001375

Submission Date: 07/07/2010

Organization Type: Individual/Professional

Organization Name: Carbohydrates Can Kill

First Name: Robert

Last Name: Su

Job Title: Physician/Author/Podcast Host: Carbohydrates Can Kill

Key Topic: Carbohydrates, Fats

Sub Topic: Added sugars, Fiber, Glycemic index, Low carbohydrate, Oils, Unsaturated fatty acids, Saturated fatty acids, Whole grains

Attachment: Y

Comment: Despite the previously publicized Dietary Guidelines and Food Pyramids, the prevalence of obesity, the average daily calorie intake, and the percentage of kcals from carbohydrate in the US increased during 1971-2000, while the percentage of kcals from total fat ?ironically decreased? and the percentage of kcals from saturated fat also ?notably decreased.?

The US health care spending has continued to rise, e.g. from \$143 per capita in 1960 to \$7,018 in 2006, or an inflation of 49.08 times. Last year, the total health care cost was \$2.4 trillion. Apparently, the dietary guidelines have failed to improve the health of Americans.

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Carbohydrates except those high in indigestible fibers afford less satiety than fats and proteins, and are the source of postprandial hyperglycemia, which causes diseases. Using more fats and proteins is the way to improve satiety that affords individuals the dietary control to reduce calorie intake, and facilitate weight loss.

Proposing an important public policy such as the Dietary Guidelines for Americans 2010 must first "Do No Harm" to all Americans. With the due respect to the members of the Dietary Guidelines Advisory Committee and the staff members of both the USDA and HHS, questions must ultimately be raised as to (1) the individual's health and fitness of the DGAC and staff, and (2) the individual's experience of the DGAC and staff in adhering to the Dietary Guidelines.

(1) Each of the DGAC and staff should conduct self-experiments to find out how their series of blood glucose levels (<http://www.carbohydratescankill.com/87/series-of-blood-glucose-tests>) behave before and continued for two hours at every 15 minutes between tests after consuming carbohydrates including whole grains and fruits, vegetables, which they recommend in the Dietary Guidelines. (2) They should try restricting carbohydrates for one week with series of postprandial blood tests as the aforementioned.

The first-hand experience from each of the DGAC and staff will help them sensibly overhaul these Dietary Guidelines 2010 for restoring and maintaining the health of Americans, and, at the same time, for reducing the health care cost.

Comment ID: 001988

Submission Date: 07/15/2010

Organization Type: Individual/Professional

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Carbohydrates, Fats

Sub Topic: Added sugars, Low carbohydrate, Saturated fatty acids, Whole grains

Attachment: N

Comment: I am a 25-year diabetic who formerly ate the diet recommended by the ADA, which is in agreement with the proposed guidelines. It made me sicker. Only by eating a very low carbohydrate diet which avoids grains, sugar, fruit, HFCS and starchy vegetables have I gotten control of my disease. I eat plenty of natural animal fats (no trans fats). I am now off insulin and Byetta and take only metformin. My A1c is typically 5.5. If you are too heavy then you have too much insulin in your bloodstream too much of the time. Insulin is THE hormone that promotes fat storage. If you eat carbohydrates, insulin levels go up. Eat fewer carbs and insulin goes down. This is not rocket science and there are many studies supporting a low carb diet for weight and blood sugar control. There are many studies showing no relationship between saturated fat and heart disease including a recent one from the Harvard Medical School.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001942

Submission Date: 07/14/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Judy Barnes

Last Name: Baker

Job Title: Author: Carb Wars; Sugar is the New Fat

Key Topic: Carbohydrates, Fats

Sub Topic: Added sugars, Low carbohydrate, Saturated fatty acids

Attachment: N

Comment: For the past 30 years we have been told to eat less fat because of the supposed link between heart disease and fat intake. But heart disease is still a leading killer and diabetes and obesity have reached epidemic proportions. Diabetes is a condition in which the body's ability to metabolize sugar and starch is impaired, yet the USDA advises everyone, even those with diabetes, to consume most of their calories as carbohydrates. New research is showing that advice to be, not just counter-intuitive, but part of the problem. It is time to return to the good, natural fats that have been blamed for the mess created by the heavily-promoted, "heart-healthy," low-fat foods that replaced them in the American diet.

Eating a diet high in natural fat is a health risk only when the diet contains too much carbohydrate, which provokes the release of insulin, the fat-storage hormone. Insulin inhibits fat burning and leads to obesity and diabetes and all the other diseases that have gotten worse since the government first issued its misguided advice. Fats and proteins are essential to life. Dietary carbohydrates are not.*

Harvard professor, Mier Stampfer, who worked on the last food pyramid, said that this year's committee "knows perfectly well what the evidence says, but they don't want to shake the status quo or risk confusing the public by changing the message." (www.slate.com/id/2248754) What they fail to realize is that their refusal to change their advice to match emerging research is already undermining their credibility. The public would be far more likely to support them if they would acknowledge the existing science. There is no disgrace in changing your mind when the evidence changes. Refusing to alter your position when you know it is wrong is indefensible.

*The lower limit of dietary carbohydrate compatible with life is apparently zero.? (The Dietary Reference Intakes, the document on which the government supposedly bases its guidelines, Ch. 6, 275)

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 002087

Submission Date: 07/15/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Kerstin

Last Name: DeRolf

Job Title:

Key Topic: Carbohydrates, Fats

Sub Topic: Added sugars, Fiber, Fish oil, Omega 3 fatty acids, Whole grains

Attachment: N

Comment: I have only been researching this for the past 1-1/2 years, but... Looking at the history of what people have consumed and, to go with it, both the reason for that particular consumption (location, socio-economic) and their health, it generally tends towards people eating grass-fed animals, non-farmed fish, and fruits and vegetables. It also includes minimally processed fats and fewer grains; those grains that are included are processed differently than today's grains. In general this tends towards more expensive food, but also more nutritious food. No High Fructose Corn Syrup (or the many variations of sugar that are in processed foods), more equal ratios of Omega 3:6 fats, and more fiber and nutrition in general. And what happens? The body feels better, weight does not come and stay (leading to overweight and obese populations), and diseases (or, as I have seen it written, dis-eases) are reduced. I am so far discovering this in my own system.

However, the current guidelines lead towards ever cheaper, more mass-produced foods that "attempt" to satisfy the dietary guidelines...and because they are so cheap, people purchase more of them and in exchange become more overweight and diseased.

Fat is not the evil it is made out to be, grains are not the beneficiary they are made out to be, and oceans are not meant to provide mankind with the majority of their protein. And by eating differently than the dietary guidelines recommend, I and my family are losing weight and becoming healthier...without being on major numbers of medications.

Comment ID: 001250

Submission Date: 06/26/2010

Organization Type: Individual/Professional

Organization Name: Abington Nutrition Services LLC

First Name: Richard

Last Name: Perlmutter

Job Title: owner

Key Topic: Carbohydrates, Fats, Protein

Sub Topic: Added sugars, Saturated fatty acids

Attachment: Y

Comment: Please see the attached letter.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001344

Submission Date: 07/02/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Cathy

Last Name: Cohen

Job Title: Nutritionist

Key Topic: Eating Patterns, Energy Balance/Physical Activity, Fats, Food Groups, Nutrient Density/Discretionary Calc, Other

Sub Topic: Fruits, Meat, Beans, Eggs, Fish, and Nuts, Oils, Unsaturated fatty acids, Vegetables, Weight loss, Weight maintenance

Attachment: N

Comment: Research is emerging that a Mediterranean eating style may be the most healthful and protective from disease. Guidelines should emphasize the importance of whole foods, plant foods, and consumption of healthy fats and oils (olive oil, canola oil, nuts and seeds, avocados, fatty fish), de-emphasizing the erroneous notion that fat is unhealthy and is to be avoided. Fat intake at even 40% of caloric intake may be very healthful for those who are able to maintain a healthy weight by keeping total calorie intake within age and weight-appropriate target range. At the same time, guidelines should emphasize the potential detrimental health effects of refined grain products which should be included in the discussion of added sugars. Guidelines for daily consumption of vegetables and fruits should be increased so as to replace other foods that are less nutrient-dense and more calorie-dense to aid in weight management. Physical activity guidelines should include simple ways to accumulate shorter bouts of activity during the day as an alternative to (or in addition to) one 30 or 60-minute session, since the idea is get people moving more frequently overall, outside of scheduled formal exercise. Lastly, ways to actually get people to read the Dietary Guidelines and adhere to them should be explored - which of course may entail changes on the industry and policy levels.

Comment ID: 001003

Submission Date: 06/16/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Joy

Last Name: Rohde

Job Title:

Key Topic: Eating Patterns, Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: I am happy to see that there is a call to eat more vegetables, fruits and whole grains, however, am I quite disappointed that there is no recommendation to reduce some of the other food groups that may be less healthy. Nowhere is it explicitly stated that the saturated fats that should be reduced come exclusively from meat and dairy products, and that these calorie dense foods are connected to the obesity crisis.

The study talks about reducing fast food intake, solid fat foods, and saturated fats and oils, but does not name the culprit behind the negative health implications - calories from

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

animal products.

While eating animal products in moderation can provide significant nutritional benefit, the portion size and frequency of the consumption of these products has greatly skewed upwards over the last 50 years, and is certainly not paralleled in most other countries.

I don't understand how a recommendation for increased grains, fruit, and vegetable consumption within a balanced diet, based on health studies showing positive effects wouldn't also talk about the foods that were replaced by those healthy foods. While the report damns sugars and oils, all the meat research is wishy washy and inconclusive, even though its a well known fact that increased meat consumption is tied to obesity, heart disease, cholesterol, impaired renal function and other problems.

Comment ID: 001668

Submission Date: 07/12/2010

Organization Type: Individual/Professional

Organization Name:

First Name: jan

Last Name: nunes

Job Title: retired

Key Topic: Eating Patterns, Fats, Other

Sub Topic:

Attachment: N

Comment: I am disappointed that the 2010 report does not properly emphasize the important health information which has been proved by Dr. Dean Ornish, Neal Barnard and John McDougall about the role that animal products play in the vast majority of chronic diseases that afflict Americans today. Both sides of this issues should be adequately presented so that the consumer can make up their own mind about this very important matter instead of stating that consumers should "increase intake of fat-free and low-fat milk and milk products and consume only moderate amounts of lean meats, poultry and eggs" which is to continue eating the animal foods that have caused our current health crisis. Thank you for your consideration of this very important preventive measure which would improve the health of the citizens of this country. The truth about what we eat is more important than ever. Sincerely, Jan Nunes

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001151

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Scott

Last Name: Cohen

Job Title:

Key Topic: Energy Balance/Physical Activity, Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: It's frustrating to see the committee double down on a failed strategy of attempting to reduce saturated fat intake. The country keeps getting fatter as we continue to suggest reductions in saturated fat intake. I have read both useful reviews (Good Calories, Bad Calories) and original research from Walter Willet and I have yet to see any convincing evidence for avoiding saturated fat. The most consistent finding is that HDL increases as saturated fat intake increases. By all means, let's increase vegetable intake but let's eat it with high-quality grass-fed beef.

Scott Cohen
MSPH UNC Chapel Hill
MS Exercise Science UMASS

Comment ID: 001158

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: D. Marie

Last Name:

Job Title: RN, BSN

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: As a concerned fertility health care professional, I've seen many suffer as a result of your low fat diet guidelines. The majority of infertility has an underlying insulin resistance/metabolic syndrome, a precursor to diabetes and heart disease. Women experience hormonal imbalances and irregular and absent menstrual cycles when following your low-fat, low cholesterol /high carb recommendations. When fat soluble nutrients and butter are added into the diet, the metabolism corrects. I have seen many women correct hormonal imbalances, some struggling > than 10 years. The 2007 Harvard Fertility Diet study, over 18,000 women, shows the lowest fertility group consumed 1-2 servings daily of low fat dairy. Highest fertility groups consumed 1-2 servings of full fat dairy daily and ate ice cream twice weekly. Regarding insulin resistance, which is underlying heart disease, diabetes, infertility and so on, hmm, it would seem that what corrects the metabolic syndrome for infertility should also correct the same metabolic

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

syndrome for heart disease, diabetes, etc. Dietary cholesterol is not the problem, all the carbs you recommend are, along with your low cholesterol, low-fat, low fat soluble nutrient diet mantra. Studies are now confirming this(a few noted below) Cholesterol is an important precursor to several hormones and is vital to health. The low-fat approach to eating as a nation hasn't helped us control weight or become healthier. You seem to be catering to the food companies, who have re-engineered thousands of foods to be lower in fat or fat free.

1)Beresford SA, Johnson KC, Ritenbaugh C, et al. JAMA. 2006; 295:643-54. CONCLUSION: In this study, a low-fat dietary pattern intervention did not reduce the risk of colorectal cancer.

2)Howard BV, Manson JE, Stefanick ML, et al. JAMA. 2006; 295:39-49. CONCLUSION: A low-fat eating pattern does not result in weight gain.

3) Howard BV, Van Horn L, Hsia J, et al. JAMA. 2006; 295:655-66. CONCLUSIONS: Over a mean of 8.1 years, a dietary intervention that reduced total fat intake and increased intakes of vegetables, fruits, and grains did not significantly reduce the risk of CHD, stroke, or CVD.

Comment ID: 001159

Submission Date: 06/24/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Karol

Last Name: Christie

Job Title:

Key Topic: Fats

Sub Topic: Saturated fatty acids, Trans fatty acids

Attachment: N

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines regarding saturated fats such as egg yolks, butter, whole milk and cheese. The current obesity epidemic came about as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats.

Basic biochemistry shows that the human body has a very high requirement for saturated fats in all cell membranes. My son is a prime example of this need for saturated fats. As a baby, he was often sick and had a host of health issues as a result of following the 'food pyramid' guidelines. Today, however, at age 16 and after 9 years of providing him with a diet high in healthy SATURATED fats and minimal to no trans fats, he is regaining his health and now misses few days of school. He is happier and, though he consumes a much higher amount of saturated fats than the Guidelines recommend, he is not overweight (5'8" and 120 pounds) and has normal cholesterol.

A major problem is the Guidelines lump trans fats (found in most processed foods) together with saturated fats-calling them Solid Fats. This hides the difference between unhealthy industrial trans fats and healthy traditional saturated fats.

The proposed Guidelines are not based on science but are designed to promote the products of commodity agriculture and, thus, encourage the consumption of processed foods.

Also, the proposed Guidelines completely avoid mentioning blood sugar problems caused by a diet high in carbohydrates and low in fat; the diet is particularly dangerous for those suffering from diabetes or hypoglycemia, since fats help regulate blood sugar levels. I suffered from hypoglycemia, often with difficulty concentrating, until I switched to a diet high in saturated fats and no trans fats.

In conclusion, the Guidelines should be scrapped and the committee members should be replaced with individuals who have no ties to the food processing industry or to

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

universities that accept funding from the food processing industry.

Respectfully submitted,

Karol Christie

Comment ID: 001164

Submission Date: 06/24/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Terry

Last Name: Colegate

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: "The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources," explains Fallon Morell.

"The revised Guidelines recommend even more stringent reductions in animal fats and cholesterol than previous versions," says Fallon Morell, "and are tantamount to rearranging the deck chairs on the Titanic. While the ship of state sinks under the weight of a crippling health care burden, the Committee members are giving us more of the same disastrous advice. These are unscientific and grossly deficient dietary recommendations."

The Weston A. Price Foundation is a non-profit nutrition education foundation with no ties to the government or food processing industries. Named for Dr. Weston A. Price, whose pioneering research discovered the vital importance of animal fats in human diets, the Foundation has warned against the dangers of lowfat and plant-based diets.

"Basic biochemistry shows that the human body has a very high requirement for saturated fats in all cell membranes; if we do not eat saturated fats, the body will simply make them from carbohydrates, but excess carbohydrate increases blood levels of triglyceride and small, dense LDL, and compromises blood vessel function," says Fallon Morell. "Moreover, high-carbohydrate diets do not satisfy the appetite as well as diets rich in traditional fats, leading to higher caloric intakes and often to bingeing and splurging on empty foods, resulting in rapid weight gain and chronic disease."

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001167

Submission Date: 06/24/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Linda

Last Name: Collins

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources. Basic biochemistry shows that the human body has a very high requirement for saturated fats in all cell membranes; if we do not eat saturated fats, the body will simply make them from carbohydrates. But excess carbohydrate increases blood levels of triglyceride and small, dense LDL, and compromises blood vessel function. Moreover, high-carbohydrate diets do not satisfy the appetite as well as diets rich in traditional fats, leading to higher caloric intakes and often to bingeing and splurging on empty foods, resulting in rapid weight gain and chronic disease.

The Guidelines should be scrapped and the committee members should be replaced with individuals who have no ties to the food processing industry or to universities that accept funding from the food processing industry.

Comment ID: 001170

Submission Date: 06/24/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Elizabeth

Last Name: Grange

Job Title: Real Food Nutrition Educator

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: When I was eating a diet "low in fat" I developed digestive problems and could not digest foods, specifically dairy foods. When I read that proteins in foods need their saturated fats that are naturally a part of that food, I switched to whole fat dairy products and the digestive disorder went away.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

I'm a Health Educator and previously worked for a State Health Department, I learned all the USDA guidelines in my schooling and it was what I was teaching others. I continued learning food science and quickly learned that fats are essential for absorbing and metabolizing nutrients in the body. Fats are not the cause of modern disease, but the source of fats make the difference. Animal fats are nutrient dense and absorbable by the human body. The source of these fats needs to be humanely raised animals- NOT from feed lots. It's feed lot and confinement raised animals (given hormones, antibiotics and pesticide covered unnatural to the animals diet food) that is causing majority of these disease. Lets get people eating nutrient dense animal fats from well- raised grass-fed animals, these fats are beneficial to others.

Trans fats and saturated fats should be in separate groups! They are different from source to what they do to the human body. Its very sad for the American population that you aren't grouping these separately as saturated fats from coconut and grass fed dairy and meats are nourishing sources of fat soluble vitamins- especially for growing babies and children!

Please separate these fats into their own groups and acknowledge that saturated fats from grass-fed animals and unprocessed coconut is nutrient dense.

Thanks.

Comment ID: 001179

Submission Date: 06/24/2010

Organization Type: Individual/Professional

Organization Name:

First Name: debbie

Last Name: thompson

Job Title:

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources

Basic biochemistry shows that the human body has a very high requirement for saturated fats in all cell membranes; if we do not eat saturated fats, the body will simply make them from carbohydrates. But excess carbohydrate increases blood levels of triglyceride and small, dense LDL, and compromises blood vessel function. Moreover, high-carbohydrate diets do not satisfy the appetite as well as diets rich in traditional fats, leading to higher caloric intakes and often to bingeing and splurging on empty available to Americans are egg yolks and full-fat cheese

The Guidelines lump trans fats together with saturated fats-calling them Solid Fats-thereby hiding the difference between unhealthy industrial trans fats and healthy

The Guidelines are not based on science but are designed to promote the products of commodity agriculture and-through the back door-encourage the consumption of processed foods

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

The Guidelines completely avoid mentioning blood sugar problems caused by a diet high in carbohydrates and low in fat; the diet is particularly dangerous for those suffering from diabetes or hypoglycemia, since fats help regulate blood sugar levels. Many people have difficulty concentrating or can even suffer from seizures on a diet too low in fat

The Guidelines urge salt restriction, which will lead to an increased use of artificial flavors like MSG in processed foods

The Guidelines should be scrapped and the committee members should be replaced with individuals who have no ties to the food processing industry or to universities that accept funding from the food processing industry

Comment ID: 001181

Submission Date: 06/24/2010

Organization Type: Individual/Professional

Organization Name:

First Name: MEERA

Last Name: SINROJA

Job Title: STUDENT

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: Many Americans have a tendency of laying of fat. The new trend of fat free foods is fast catching on. But they do not realize that fats are important for body functioning like absorption of fat soluble vitamins and minerals as well as providing cushioning for delicate organs. The government recommends 65 gms of fat for daily intake. 30 gms would be sustainable too.

Another issue is cholestrol. I don not mean to take people on being vegetarian, but fish and meat and dairy products have too much cholestrol in them. Having meat twice in a week is what I suggest. The other days beans, legumes, pulses and other green vegetables, dairy products and milk should be consumed to avoid health problems like cardiac arrest.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001099

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Dawn

Last Name: Gifford

Job Title: nutritionist

Key Topic: Fats

Sub Topic: Cholesterol, Saturated fatty acids, Trans fatty acids

Attachment: N

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources.

When healthy foods like cheese and eggs are singled out as foods to be avoided, there must be something wrong with the premises on which the guidelines are based. The main sources of vitamin K2 and choline available to Americans are egg yolks and full-fat cheese.

The National Academy of Sciences recommends 375 mg of choline per day for children nine through thirteen years of age, 450 mg for pregnant women and 550 mg for lactating women and men aged fourteen and older. These amounts are provided by four or five egg yolks per day-but that would entail consuming 800-1000 mg cholesterol, a crime by USDA standards. The committee referred to this as the "choline problem." Pregnant women and growing children especially need to eat as many egg yolks as possible-yet the Guidelines demonize this nutrient-dense food.

The Guidelines are not based on science but are designed to promote the products of commodity agriculture and-through the back door-encourage the consumption of processed foods.

The Guidelines should be scrapped and the committee members should be replaced with individuals who have no ties to the food processing industry or to universities that accept funding from the food processing industry.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001100

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name:

Last Name:

Job Title: Registered Nurse

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources. Basic biochemistry shows that the human body has a very high requirement for saturated fats in all cell membranes; if we do not eat saturated fats, the body will simply make them from carbohydrates, but excess carbohydrate increases blood levels of triglyceride and small, dense LDL, and compromises blood vessel function. Moreover, high-carbohydrate diets do not satisfy the appetite as well as diets rich in traditional fats, leading to higher caloric intakes and often to bingeing and splurging on empty foods, resulting in rapid weight gain and chronic disease.

The proposed guidelines will perpetuate existing nutrient deficiencies present in all American population groups, including deficiencies in vitamins A and D found in animal fats, vitamins B12 and B6 found in animal foods, as well as minerals like calcium and phosphorus, which require vitamins A and D for assimilation. Moreover, low intakes of vitamin K2, are associated with increased risk of heart disease and cancer. The main sources of vitamin K2 available to Americans are egg yolks and full-fat cheese. (Information taken from The Weston A. Price Foundation website <http://www.westonaprice.org/action-alerts/2010-alerts/1949-action-alert-usda-dietary-guidelines-for-2010.html>)

Comment ID: 001101

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Woman 68 years old

Last Name:

Job Title:

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: I followed the USDA for years and was diagnosed with Fibromyalgia 5 years ago. After much research, I began to eat saturated fats (butter, cream, red meat) and cut out processed carbohydrates. I no longer have "Fibromyalgia". Please give us whole foods not synthetics and processed foods in the guidelines.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001106

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Mercedes

Last Name: Brugh

Job Title: craft artist

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: Your guidelines are terrible. My cardiovascular function and Lpa are good, now that I quit listening to such bad advice. You fail to make the distinction between trans-fats and saturated fats. I get plenty of animal fats, including cheese, butter, and eggs, plus olive oil and cocunut oil. Basically I eat the way people ate before heart disease became an epidemic. My Lpa is under 4. I take no drugs.

Comment ID: 001109

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Charlotte

Last Name: Smith

Job Title:

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: These new guidelines continue to demonize saturated fats such as egg yolks, whole milk, fatty meats and other nutrient dense foods. Animal fats provide many nutrients that are difficult to obtain from other sources. These proposed guidelines will continue contributing to the obesity problem, infertility, neurological disorders, and myriad other issues faced by many Americans.

Up until 5 yrs. ago my children & I ate according to the government proposed guidelines. My children suffered from severe eczema, we all had allergies, and had 8-10 colds each year that resulted in 2-3 ear infections each. We were not much different than other families.

5 yrs. ago we switched to a traditional diet - 50% of our calories are from saturated fat from whole, raw milk, grass fed beef, pastured chickens & eggs, soaked grains, and butter, yogurt & cheese made from our whole, raw milk. My children's eczema cleared up completely within a couple months, never to return. We have not had ear infections in 5 yrs. I haven't taken allergy or other cold meds in this time. We are all of normal weight and extremely great health. Even our doctor comments that he never sees us anymore because

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

we are so healthy!

The Guidelines are not based on science but are designed to promote the products of commodity agriculture and-through the back door-encourage the consumption of processed foods.

The Guidelines should be scrapped and the committee members should be replaced with individuals who have no ties to the food processing industry or to universities that accept funding from the food processing industry.

It's time for American families to do their own research & learn the truth & improve our family's health along the way.

Comment ID: 001111

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Jennifer

Last Name: Steinbachs

Job Title: Naturopathic student

Key Topic: Fats

Sub Topic:

Attachment: Y

Comment: The new proposed Guidelines are deeply flawed. High-carbohydrate diets contribute to metabolic syndrome. Brain health and reproductive health require animal fats.

Comment ID: 001116

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Louisa

Last Name: Enright

Job Title:

Key Topic: Fats

Sub Topic: Cholesterol, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids

Attachment: N

Comment: Shame on you! The low-fat, high carbohydrate diet you perpetuate here is based on junk science and has been for the past 40 years. It has made and is making people sick. There is no science showing saturated fats are bad. There is no science showing high cholesterol is related to heart disease. There is a lot of science showing highly processed vegetable oils and trans fats are killers. Fruits and vegetables are not nutrient dense. Meat from healthy animals, milk, eggs, and cheese are nutrient dense. You must act to

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

protect people before industry. You have sold out the American citizens you should be protecting--particularly the children. It's time to get real science back into any USDA proposed diet. If you cannot do that, get out of the diet recommendation role.

Comment ID: 001030

Submission Date: 06/17/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Ana

Last Name: Mahoney

Job Title: Nutritionist

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: Children and adults need to incorporate healthy fats into their diet and the continued promotion of low fat diets result in deficient metabolic processes, compromised immune systems and deficient brain and central nervous system function. Please revise dietary guidelines and become informed as to the benefits of traditional healthy saturated fats, traditional mono and poly unsaturated fats and natural trans fats. The public must be made aware of the dangers of man made trans fats and of processed/refined vegetable oils.

Comment ID: 001037

Submission Date: 06/17/2010

Organization Type: Individual/Professional

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: N

Comment: It would be helpful to list omega-3 options for vegans and others who do not consume fish/meat/eggs. Specific amounts of alternative foods/substances would be greatly appreciated.

Thank you for your consideration, and thank you for taking the time to work for the health of the nation.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001001

Submission Date: 06/16/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Danielle

Last Name: Huff

Job Title: Student

Key Topic: Fats

Sub Topic: Cholesterol

Attachment: N

Comment: While I applaud most of the recommendations, I wonder why the DGAs, like far too many health and nutrition organizations, continues on perpetuating the myth that dietary cholesterol intake has anything to do with blood cholesterol levels or CVD risk. As my Nutritional Biochemistry class pointed out, the literature and science clearly tells us that dietary cholesterol intake does not raise blood cholesterol levels. The body actually MAKES cholesterol (on the order of 1000 mg or so) each day on top of the cholesterol we consume, so if you eat 500 mg of cholesterol instead of the currently recommended 200 or 300 mg, all that happens is that your body makes a bit less. There are so many other nutrients people should be focusing on, things that actually have important direct health consequences. I look forward to this day when organizations start admitting this and stop scaring everyone away from eggs and other high-cholesterol items that may be quite good for you otherwise.

Comment ID: 001094

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Margaret

Last Name: Thacker

Job Title: teacher

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: Having read over the new guidelines I was unhappy to see that the guidelines lump saturated and trans fats together, hiding the benefits we get from healthy traditional saturated fats. These saturated fats fight inflammation, support the immune system, support hormone production and protect against heart disease and cancer. Biochemistry has proven that the body requires saturated fats in cell membranes and by limiting these the body will make them from carbohydrates which will lead to a multitude of other health problems. These guidelines aren't science based but promote commodity-agriculture products and encourage the consumption of highly processed foods. Please scrape the new guidelines and replace the committee members with people who aren't tied to the food processing industry and universities that get their funding from the same. Sincerely, Margaret Thacker

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001358

Submission Date: 07/05/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Paul

Last Name: Roberts

Job Title: R.Ph., M.S., C.G.P.

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: As a Pharmacist with a Masters Degree in Human Nutrition I'm really confused why would we further limit saturated fats, and not eliminate trans fats from our diets?

The human body has enzyme systems to easily create and to metabolize saturated fat. It's what our body uses for storage. Yes, we need to account for the caloric intake from ALL fats as part of a healthy diet. DO NOT RECOMMEND RESTRICTING SATURATED FAT INTAKE! RECOMMEND EASING RESTRICTIONS ON SATURATED FAT INTAKE!

Yet the enzymes I've studied are NOT able to breakdown TRANS FATS, as they are not naturally found in the human diet to any significant level. BAN TRANS FATS IN FOOD IN AMERICA!

These two things will go a long way to improving health in the United States.

Comment ID: 001280

Submission Date: 06/28/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Ron

Last Name: Elterman

Job Title:

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: N

Comment: The report notes a "need for efficient and ecologically friendly strategies to allow for greater consumption of seafood n-3 fatty acids, unless plant-derived sources of EPA or DHA can be developed."

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Ecologically friendly, algae-derived vegan sources already exist, as in the V-Pure and Pure One supplements, which contain both EPA and DHA.

Comment ID: 001291

Submission Date: 06/29/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Melanie

Last Name: Spaulding

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: We need fat! Healthy fats from animals allow us to properly digest healthy vegetables and contain important nutrients. Without enough fat, we eat more processed carbs that actually cause weight gain. This proposal is not a healthy option for Americans. We need to get back to real food! Food in its natural form is better for our bodies.

Comment ID: 001321

Submission Date: 07/01/2010

Organization Type: Individual/Professional

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Fats

Sub Topic: Cholesterol, Saturated fatty acids

Attachment: N

Comment: Continuing to demonize saturated fat is causing a health epidemic in this country. My health has improved significantly since I now eat 4 organic eggs from pastured chickens and several Tablespoons a day of organic butter, also coconut oil, plenty of celtic sea salt, cod liver oil, and raw milk. I was vegetarian for 30 years, almost lost my teeth and had a huge fibroid tumor.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001406

Submission Date: 07/07/2010

Organization Type: Individual/Professional

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Fats

Sub Topic: Oils, Unsaturated fatty acids

Attachment: N

Comment: We need to better emphasize the healthy fats that are available and I don't mean just olive oil, but also nuts, avocados, olives (except for the black olives that most Americans eat) and hummus.

Comment ID: 001413

Submission Date: 07/08/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Marybeth

Last Name: Stish

Job Title: Nutritionist

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: The proposed 2010 Dietary Guidelines need to be changed to encourage intake of saturated fats and animal foods rich in saturated fatty acids. These foods must be encouraged for vibrant health as well as recovery of health.

It's time to stop perpetuating junk science about saturated fats being unhealthy. It is saturated fats that healed my PTSD after the sudden death of my husband. I have seen the same recovery using saturated fats with the military veterans I work with returning from war with PTSD.

The current obesity epidemic as well as cardiac illnesses and cancer emerged as vegetable oils and refined carbohydrates replaced healthy, nutrient-dense traditional animal fats.

Animal fats supply many essential nutrients that are difficult to obtain from other sources...Vitamins A, D, E and K. Couples planning to conceive and pregnant woman must increase their intake of these vitamins.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

The Guidelines need to be based on non-biased science that is not tampered with by self serving corporate nutrition.

When the guidelines ignorantly restrict healthy animal fats in school lunches and diets for pregnant women, growing children and the elderly, we perpetuate the tragic epidemic of learning, behavior and brain disorders.

Isn't it obvious that we now have an epidemic of brain function decline with Alzheimers? These brains are starving for saturated fats.

It is time for the Guidelines to stop lumping trans fats together with saturated fats-calling them Solid Fats-thereby hiding the difference between unhealthy industrial waste trans fats and healthy traditional saturated fats.

Trans fats contribute to inflammation, depress the immune system, interfere with hormone production, and set up pathological conditions leading to cancer and heart disease.

Saturated fats are healing: they must be encouraged in the diet to fight inflammation, support the immune system, support hormone production and protect against cancer and heart disease.

Comment ID: 001605

Submission Date: 07/11/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Luke

Last Name: Woodward

Job Title: student

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources.

Guidelines are not based on science but are designed to promote the products of commodity agriculture and?through the back door?encourage the consumption of processed foods.

The Guidelines should be scrapped and the committee members should be replaced with individuals who have no ties to the food processing industry or to universities that accept funding from the food processing industry.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001209

Submission Date: 06/24/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Kari

Last Name: Alfaro

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: Y

Comment: This post is concerning the new dietary guidelines. Once again saturated fat is made out to be the "bad guy", despite growing evidence to the contrary. In the recent June 2010 Townsend Letter there is a literature review by Alan Gaby MD that states, "...no significant association was found between intake of saturated fat and risk of coronary heart disease, stroke, or cardiovascular disease." The healthiest diet one can consume is that which is closest to what ones ancestors ate. Unprocessed, whole, properly prepared, high fat, low natural sugar, often fermented real food. If the emphasis on fat reduction was on trans fat, something that is not found in nature, I would understand the concern. However, no distinction is being made from saturated fat which is the optimal fuel for the body and trans fat which the body has no idea how to cope with. The only ones who profit from this incorrect advice being put out by the FDA in its food pyramid recommendations, are the large medical corporations who thrive on people who are sick and die very slowly.

Comment ID: 001260

Submission Date: 06/27/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Rob

Last Name: Malcomnson

Job Title: Urban Agriculture Technician

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: The usda dietary guidelines are wrong because:
By restricting healthy animal fats in school lunches and diets for pregnant women and growing children, the Guidelines will perpetuate the tragic epidemic of learning and behavior disorders.
The nutrients found most abundantly in animal fats and organ meats-

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

including choline, cholesterol and arachidonic acid-are critical for the development of the brain and the function of receptors that modulate thinking and behavior. Studies show that choline helps the brain make critical connections and protects against neurotoxins; animal studies suggest that if choline is abundant during developmental years, the individual is protected for life from developmental decline.

The National Academy of Sciences recommends 375 mg of choline per day for children nine through thirteen years of age, 450 mg for pregnant women and 550 mg for lactating women and men aged fourteen and older. These amounts are provided by four or five egg yolks per day-but that would entail consuming 800-1000 mg cholesterol, a crime by USDA standards. The committee referred to this as the "choline problem." Pregnant women and growing children especially need to eat as many egg yolks as possible-yet the Guidelines demonize this nutrient-dense food.

The Guidelines lump trans fats together with saturated fats-calling them Solid Fats-thereby hiding the difference between unhealthy industrial trans fats and healthy natural solid fats.

Comment ID: 001213

Submission Date: 06/24/2010

Organization Type: Individual/Professional

Organization Name:

First Name:

Last Name:

Job Title: DIETITIAN WITH THE AMERICAN DIETETIC ASSN

Key Topic: Fats

Sub Topic: Cholesterol

Attachment: Y

Comment: I WORK AS A CONSULTANT IN NURSING HOMES FOR MANY YEARS. I FIND THE HISTORY OF ONES DIETARY INTAKE HAS A LOT TO DO WITH THEIR CURRENT HEALTH. THOSE EATING FROM THE FARM BEFORE ADMISSION TO THE HOME (FAT BACK PORK, RAW MILK) ARE HEALTHY WITHOUT DIABETES OR OTHER DISEASE PROCESS. THEY ARE MERELY OLD. THOSE WHO HAVE EATEN FROM THE GUIDELINES OF THE AMERICAN DIETETIC ASSN (LOW FAT AND CHOLESTEROL) ARE ILL WITH MUCH DISEASE PROCESS.

WE ALSO FIND THAT A DIET WITH GOOD SATURATED FAT IN THE HOME HELPS SKIN CONDITION, BLOOD SUGARS, ETC.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

PLEASE DON;T MAKE A CURRENT DIET, WHICH CAUSES DISEASE WORSE THAN IT ALREADY IS...

WAKE UP.

Comment ID: 001214

Submission Date: 06/24/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Greg

Last Name: Hoskins

Job Title:

Key Topic: Fats

Sub Topic: Saturated fatty acids, Trans fatty acids

Attachment: N

Comment: Why is it that you people just don't get it. I and millions of others, now understand the difference between Natural Saturated Fats, and the Manmade Sticky, goopy, artery clogging Trans Fats. If you really think that, Saturated fats are equally as bad for you as Trans Fats, then you need to do a fact check. If you don't want to bother finding the facts, then I can only come to one conclusion, that being, your deliberately pushing people into sickness with this manmade garbage, that is without a doubt, our worst enemy in the American diet, next to artificial sweeteners. Don't just take my word for it, take the word of thousands of scientific studies, that prove what your saying is exactly the opposite of the truth. These findings and facts are real. You have it wrong and thank god for the internet, that allows people on a very broad scale, keep the enemy of the American People in check. That enemy being the FDA, the USDA, the Big Pharms and alike. In case you haven't noticed, people are noticing, that everytime you make a recommendation, it's always the opposite of what people need for good health. We're watching.. Watch your step!

Comment ID: 001228

Submission Date: 06/25/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Linda

Last Name: Ronchetti

Job Title: RN

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: YOur 2010 guidelines for fats of any kind are absurd. who pays your salary? to lump all fats, cheese etc together makes no sense. try looking at the affects from your previous guidelines and then take a look at the health of folks who eat traditional diets, meaning diets with fats in their unadulterated, unprocessed states.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001245

Submission Date: 06/26/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Kathryn

Last Name: Blackburn

Job Title:

Key Topic: Fats

Sub Topic: Cholesterol, Saturated fatty acids

Attachment: N

Comment: I am quite concerned that the new dietary guidelines are even more strict concerning animal fats. Many important nutrients are difficult to obtain from other sources. My husband and I have been eating an animal fat rich diet of naturally grown and raised foods for several years. In that time his Irritable Bowel Syndrome symptoms have disappeared. He is lean, healthy, and active at age 71. I am recovering from years of chronic disease. This natural diet has been part of the recovery. It is so sad that people who have not had the advantage of the dietary information I have will continue to attempt to follow your guidelines, putting their health in jeopardy. It is terrifying to think that any attempt would be made to put these incorrect guidelines into law!

Comment ID: 001089

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: You are unbelievable. You release a food pyramid that very closely resembles a "how to guide" for fattening cattle. Then when the nation gets fat, you wrongly assume that people must not be following your guidelines. WAKE UP... Your guideline are wrong; and your new stringent guidelines are even more wrong. You can start by separating the distinction between trans fats and saturated fats. Basic biochemistry shows that the human body has a very high requirement for saturated fats in all cell membranes.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001130

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources. Basic biochemistry shows that the human body has a very high requirement for saturated fats in all cell membranes; if we do not eat saturated fats, the body will simply make them from carbohydrates. But excess carbohydrate increases blood levels of triglyceride and small, dense LDL, and compromises blood vessel function. Moreover, high-carbohydrate diets do not satisfy the appetite as well as diets rich in traditional fats, leading to higher caloric intakes and often to bingeing and splurging on empty foods, resulting in rapid weight gain and chronic disease. The Guidelines should be scrapped and the committee members should be replaced with individuals who have no ties to the food processing industry or to universities that accept funding from the food processing industry.

Comment ID: 001143

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Eric

Last Name: Houze

Job Title: Research Fellow

Key Topic: Fats

Sub Topic: Oils, Unsaturated fatty acids

Attachment: N

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

USDA should be recommending dramatically lower intake of n-6 unsaturated fatty acids in the American diet, which are pro-inflammatory and responsible for many of the negative health trends in the US population. because the n-6 to n-3 ratio in the US diet is now much too high.

The proposed guidelines will perpetuate existing nutrient deficiencies present in all American population groups, including deficiencies in vitamins A and D found in animal fats, vitamins B12 and B6 found in animal foods, as well as minerals like calcium and phosphorus.

By restricting animal fats in school lunches and diets for pregnant women and growing children, the Guidelines will perpetuate the tragic epidemic of learning and behavior disorders. The nutrients found most abundantly in animal fats and organ meats-including choline, cholesterol and arachidonic acid-are critical for the development of the brain.

Trans fats are lumped together with saturated fats-calling them Solid Fats-thereby hiding the difference between unhealthy industrial trans fats and healthy traditional saturated fats.

The vitamins and fatty acids carried uniquely in saturated animal fats are critical to reproduction. The 2010 guidelines will likely augment the unacceptably high rates of infertility experienced by US couples.

Guidelines appear to be designed to promote the products of commodity agriculture .

The Guidelines neglect to mention blood sugar problems caused by a diet high in carbohydrates and low in fat. This is unconscionable.

The Guidelines should be scrapped and the committee members should be replaced with individuals who have no ties to the food processing industry.

Comment ID: 001147

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Kim

Last Name:

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: Y

Comment: I am against your proposed plan and request they be scrapped.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001149

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name: Believer in the Weston Price Foundation

First Name: Molly

Last Name: Hauck

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: 1. The proposed 2010 Dietary Guidelines demonize saturated fats and animal foods rich in saturated fatty acids.

2. The human body has a high need for saturated fats in all cell membranes.

3. The proposed guidelines will perpetuate existing nutrient deficiencies in vitamins A and D, B12 and B6 found in animal foods, and vitamin K2 found in egg yolks and full-fat cheese.

4. By restricting healthy animal fats in school lunches and diets for pregnant women and growing children, the Guidelines will perpetuate learning and behavior disorders.

5. The guidelines do not meet the National Academy of Sciences recommendations for choline for children and pregnant women.

6. The Guidelines lump trans fats together with saturated fats. Trans fats are bad, saturated fats good.

7. The vitamins and fatty acids carried uniquely in saturated animal fats are critical to reproduction and reduce infertility.

8. The Guidelines are designed to promote the products of commodity agriculture and encourage the consumption of processed foods.

9. The Guidelines do not mention blood sugar problems caused by a diet high in carbohydrates and low in fat and is particularly dangerous for those suffering from diabetes or hypoglycemia, since fats help regulate blood sugar levels.

10. The Guidelines should be scrapped and the committee members should be replaced with individuals who have no ties to the food processing industry or to universities that accept funding from the food processing industry.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001831

Submission Date: 07/13/2010

Organization Type: Individual/Professional

Organization Name: eduardo dubinsky&associates Consulting on Fats&Oils for food

First Name: Eduardo

Last Name: Dubinsky

Job Title:

Key Topic: Fats

Sub Topic: Cholesterol, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids

Attachment: Y

Comment: Pls see attached letter "Comments on Fatty Acids and Cholesterol"

Comment ID: 001840

Submission Date: 07/13/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Scott

Last Name: Vander Wall

Job Title: Doctor

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: I am a doctor specializing in functional medicine. I heard about the new dietary guidelines and am extremely disappointed that you all have chosen to focus on the myth of cholesterol toxicity and the witch hunt against saturated fats. By eliminating nutrient rich foods like cheese, egg yolks and butter one effectively eliminates the sources of highly available choline, B vitamins etc. But essentially this diet is dangerous to children, pregnant females and diabetics.

Promoting a low fat high carbohydrate diet is nothing new and will only yield more of the same predilection for obesity, diabetes and learning disabilities. Failing to stop trans fats in food is indefensible.

Obviously these guidelines are written to promote consumption of the same cheap and unhealthy food we have been forced into since the flood of cheap vegetable oils started all this. Obviously there is deep conflict of interest in you organization.

Sincerely,

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Dr. Vander Wall

Comment ID: 001928

Submission Date: 07/14/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Geoffrey C.

Last Name: Morell

Job Title:

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: To be healthy, we should eat the foods of our ancestors--fish, meat, traditional animal fats like butter, and vegetables.

Comment ID: 002050

Submission Date: 07/15/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Sarah

Last Name: Eisenhower

Job Title: Dietitian

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: N

Comment: Dear USDA and HHS,

Thank you for the opportunity to comment on the DGAC's report -- an impressive body of literature, no doubt.

The benefits of omega-3 fatty acids are not in question. However, the Report's recommendation of increased fish is near sighted.

Non-fish sources should be encouraged, as they provide additional nutritional benefits. Good sources of alpha-linolenic acid (ALA) include ground flaxseed, flaxseed oil, canola oil, soy products, hemp products, and walnuts.

Thank you for the opportunity to comment. I wish the USDA and HHS the best of luck in crafting a policy document from this enormous body of work.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Sarah Ann Eisenhower, MS, RD, LD

Comment ID: 001091

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Phyllis

Last Name: Hasbrouck

Job Title:

Key Topic: Fats, Food Groups

Sub Topic:

Attachment: N

Comment: I am writing to urge that you scrap the draft Dietary Guidelines that you have issued, and start over with a committee of individuals who have no ties to the food processing industry or to universities that accept funding from the food processing industry.

These guidelines once again demonize healthy foods like animal fats and proteins, and drive people to a high carbohydrate, low-fat diet which has killed and injured so many people.

I was a vegetarian for years, which resulted in acid reflux, inflammations, and peripheral neuropathy. By switching to a diet of nutrient-dense foods, including lots of animal fats and meats (all organic) these problems have improved greatly.

When I was a vegetarian I got sick about 5 or six times in year. In the 5 years since I went to the Weston A. Price diet, I have been sick a total of 4 times. In Nov. 2009 I gave up glutinous grains. I lost 32 pounds and am now at my ideal weight. I eat meat, butter, eggs, whole raw milk every day, and my cholesterol is only at 140.

The Guidelines lump trans fats together with saturated fats-calling them Solid Fats-thereby hiding the difference between unhealthy industrial trans fats and healthy traditional saturated fats. Trans fats contribute to inflammation, depress the immune system, interfere with hormone production, and set up pathological conditions leading to cancer and heart disease, whereas saturated fats fight inflammation, support the immune system, support hormone production and protect against cancer and heart disease.

Please wake up to the fact that ever since the government started promoting this low-fat, high-carb diet, our nation's health has gone downhill, though the profits of food processing corporations have gone up.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001095

Submission Date: 06/23/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Kathleen

Last Name: O'Donnell

Job Title: pharmacist

Key Topic: Fats, Food Groups

Sub Topic:

Attachment: N

Comment:

1. The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources.
2. When a healthy food like cheese is singled out as a food to be avoided, there must be something wrong with the premises on which the guidelines are based.
3. Basic biochemistry shows that the human body has a very high requirement for saturated fats in all cell membranes; if we do not eat saturated fats, the body will simply make them from carbohydrates. But excess carbohydrate increases blood levels of triglyceride and small, dense LDL, and compromises blood vessel function. Moreover, high-carbohydrate diets do not satisfy the appetite as well as diets rich in traditional fats, leading to higher caloric intakes and often to bingeing and splurging on empty foods, resulting in rapid weight gain and chronic disease.
4. The proposed guidelines will perpetuate existing nutrient deficiencies present in all American population groups, including deficiencies in vitamins A and D found in animal fats, vitamins B12 and B6 found in animal foods, as well as minerals like calcium and phosphorus, which require vitamins A and D for assimilation. Moreover, low intakes of vitamin K2, are associated with increased risk of heart disease and cancer. The main sources of vitamin K2 available to Americans are egg yolks and full-fat cheese.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 002048

Submission Date: 07/15/2010

Organization Type: Industry Association

Organization Name: Grocery Manufacturers Association

First Name: Jeffrey

Last Name: Barach

Job Title: Vice President, Science Policy, New Technologies

Key Topic: Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Evidence-based Review Process, Fats, Fluid and Electrolytes, Nutrient Density/Discretionary Calc

Sub Topic: Added sugars, Saturated fatty acids

Attachment: Y

Comment: The Grocery Manufacturers Association (GMA) represents the world's leading food, beverage and consumer products companies. The Association promotes sound public policy, champions initiatives that increase productivity and growth and helps ensure the safety and security of consumer packaged goods through scientific excellence. The GMA board of directors is comprised of chief executive officers from the Association's member companies. The \$2.1 trillion food, beverage and consumer packaged goods industry employs 14 million workers, and contributes over \$1 trillion in added value to the nation's economy.

GMA congratulates the 2010 Dietary Guidelines Advisory Committee (DGAC) on their achievement. We thank the staff of Office of Disease Prevention and Health Promotion and Center for Nutrition Policy and Promotion for this opportunity to provide comments on how we believe the 2010 DGAC report should be used to build a strong and effective 2010 Dietary Guidelines for Americans.

Comment ID: 002113

Submission Date: 07/15/2010

Organization Type: Industry Association

Organization Name: National Confectioners Association

First Name: Alison

Last Name: Bodor

Job Title: Senior Vice President, Public Policy

Key Topic: Carbohydrates, Energy Balance/Physical Activity, Fats

Sub Topic: Saturated fatty acids, Weight loss, Weight maintenance

Attachment: Y

Comment:

- I. There is a need for clear communication to consumers about the impact of stearic acid on blood lipids.
- II. Modest dark chocolate and cocoa consumption in the context of a balanced diet may have a role in reducing cardiovascular disease risk.
- III. Chewing gum can be part of a strategy to promote dental health and weight management.
- IV. NCA recommends a correction of the definition of "Sugars" in Table D5.1.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

V. There is a place for "little pleasures," such as candy, in an overall lifestyle that supports health, wellness and happiness.

Comment ID: 002106

Submission Date: 07/15/2010

Organization Type: Industry Association

Organization Name: Soyfoods Association of North America

First Name: Nancy

Last Name: Chapman

Job Title: Executive Director

Key Topic: Eating Patterns, Evidence-based Review Process, Fats, Food Groups, Minerals, Nutrient Density/Discretionary Calc, Protein, Vitamins

Sub Topic:

Attachment: Y

Comment: The Soyfoods Association of North America suggests that in translating the Scientific Report from the Dietary Guidelines Advisory Committee into policy and consumer documents, that DHHS and USDA consider the following suggestions:

1. Distinguish soy products/soyfoods separately from "cooked dry beans and peas and seeds/nuts."
2. Recognize that soy protein is comparable to animal protein in protein quality, based on the widely recognized methodology, Protein Digestibility Corrected Amino Acid Score (PDCAAS).
3. Highlight the nutritional adequacy and high-quality protein value of soyfoods.
4. Support further research on the health benefits of plant-based diets and soyfoods in relation to heart disease, weight management and diabetes prevention.
5. Create a consumer brochure that balances simple text with menu tables, graphics and other visuals which captivates, motivates and displays to consumers how to incorporate more plant-based foods into their daily diets.

Comment ID: 002128

Submission Date: 07/15/2010

Organization Type: Industry Association

Organization Name: National Association of Margarine Manufacturers (NAMM)

First Name: Sarah

Last Name: Wally

Job Title: Manager, Nutrition Communications

Key Topic: Fats

Sub Topic: Trans fatty acids

Attachment: Y

Comment: On behalf of the National Association of Margarine Manufacturers (NAMM), please find our comments attached.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 002182

Submission Date: 07/21/2010

Organization Type: Industry Association

Organization Name: Qualisoy

First Name: John

Last Name: Becherer

Job Title: CEO

Key Topic: Fats

Sub Topic: Other, Trans fatty acids

Attachment: Y

Comment: See attachment. This comment was received via mail on 7/15 prior to 5 pm EDT and was manually entered into the system today by CNPP Staff.

Comment ID: 002010

Submission Date: 07/15/2010

Organization Type: Industry Association

Organization Name: National Sunflower Association

First Name: Larry

Last Name: Kleingartner

Job Title: Executive Director

Key Topic: Fats

Sub Topic: Oils, Unsaturated fatty acids

Attachment: N

Comment: An area of responsibility for the National Sunflower Association is to provide the food industry and consumers with vegetable oils that have health attributes and functionality for the food industry. Thus, the Dietary Guidelines are a blueprint for long term planning. It takes hybrid seed companies 10 years to change the fatty acids of a seed that has the agronomic characteristics that farmers require. Thus, the statements and recommendations in the Dietary Guidelines on fats and oils have broad implications on long term research programs.

When Trans fats became a health suspect in the early 1990s, the sunflower industry began an aggressive program to redesign the fatty acid structure of sunflower oil to include more oleic acid. Today sunflower produced in the US is high in oleic acid. PUFA sunflower oil is no longer produced in the US. (It is important to recognize the error in the 2010 proposed Guidelines where sunflower oil is mentioned in the PUFA section of the Background of Fats and Cholesterol. Sunflower oil produced and consumed in the US is 65-85 percent oleic acid and therefore should correctly be mentioned in the MUFA section of the proposed Guidelines.)

It is of interest that stearic acid is identified in the proposed Guidelines as not appearing to raise LDL and stearic acid should not be categorized as cholesterol raising. This statement is significant. Research programs to create stearic based oils are under way and the statement in the proposed Guidelines provides further incentive. A high stearic/high oleic sunflower oil will be introduced in the US this year. However, consumers are most likely to continue to be wary of stearic acid especially when the nutrition panel combines stearic with the other saturated fatty acids. Stearic acid should be differentiated on the nutrition panel from other saturates that increase LDL cholesterol.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001818

Submission Date: 07/13/2010

Organization Type: Industry Association

Organization Name: U.S. Canola Association

First Name: Doug

Last Name: Scoville

Job Title: President

Key Topic: Fats

Sub Topic: Cholesterol, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids

Attachment: Y

Comment: Given the need to reduce non-nutritive calories in the American diet, the U.S. Canola Association (USCA) supports the Dietary Guidelines Advisory Committee's (DGAC's) recommendations for all Americans to: 1) reduce solid fats and foods containing them in consumer food choices, restaurants and food products; 2) gradually reduce intake of saturated fatty acids (SFA) from 10 to 7 percent of total daily calories, replacing those calories with unsaturated fatty acids; 3) limit cholesterol-raising fats (SFA exclusive of stearic acid and trans fatty acids) to less than 5 to 7 percent of energy; 4) consume less than 300 mg of cholesterol per day and 5) avoid artificial (industrial) trans fatty acids. While the DGAC recommends total fat consumption in the range of 20 to 35 percent of total calories, the USCA suggests the DGAC consider reducing this range to 20 to 30 percent due to DGAC's own conclusion that "consuming the recommended intake of saturated fat is more likely achievable when total fat intake is less than 30 percent of total calories." This reduction should not come at the expense of increased intake from simple carbohydrates.

Comment ID: 001874

Submission Date: 07/14/2010

Organization Type: Industry Association

Organization Name: Global Organization for EPA and DHA Omega-3S

First Name: Harry

Last Name: Rice

Job Title: Director, Regulatory & Scientific Affairs

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: see attachment

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001883

Submission Date: 07/14/2010

Organization Type: Industry Association

Organization Name: California Walnut Commission California Walnut Board

First Name: Dennis A.

Last Name: Balint

Job Title: CEO

Key Topic: Fats

Sub Topic: Oils, Unsaturated fatty acids

Attachment: Y

Comment: Walnuts, alpha linolenic acid

Comment ID: 001445

Submission Date: 07/09/2010

Organization Type: Industry Association

Organization Name: Martek Biosciences

First Name: Connye

Last Name: Kuratko

Job Title: Senior Manager, Medical Affairs

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: Please see attached document for comment.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 002102

Submission Date: 07/15/2010

Organization Type: Industry Association

Organization Name: National Fisheries Institute

First Name: Jennifer

Last Name: McGuire, MS, RD

Job Title: Manager, Nutrition Communication

Key Topic: Fats, Food Safety

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: At the National Fisheries Institute, we experience daily how seafood advice is interpreted or, more often, misinterpreted by consumers, healthcare professionals, companies, and the media.

As a result, Americans are thoroughly confused about eating seafood. A Johns Hopkins University study published in the March 2010 issue of Public Health Nutrition looked at 310 news stories on fish and health and found ?messages pertaining to the risks associated with eating fish outweighed benefit messages about eating fish four to one.? Researchers conclude ?the implication of the domination of risk messages in the news is significant. Risk-only messaging results in negative perceptions of seafood and reduced intention to consume fish, and even balanced information that presents both risks and benefits may still worsen the overall perception of seafood consumption.?

The 2010 Dietary Guidelines can best help clear up confusion and get Americans eating fish-rich diets for better health by keeping a couple thoughts in mind:

1. It should be specified that there are just four uncommon fish ? shark, swordfish, tilefish, and king mackerel ? the targeted population of women who are or may become pregnant, breastfeeding moms, and young children should not eat during this time in their lives.
2. USDA and HHS should frame the findings of the Advisory Committee Report as the specific benefits of eating seafood, as well as the specific risks of avoiding seafood, per the recommendation of the ?Joint FAO/WHO Expert Consultation on the Risks and Benefits of Fish Consumption: Executive Summary,? released in May 2010.

Thank you again for this chance to both praise the scientific work of the Advisory Committee, and identify areas where more specific and complete communication is called for.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 002009

Submission Date: 07/15/2010

Organization Type: International Organization

Organization Name: Malaysian Palm Oil Board

First Name: Kalanithi

Last Name: Nesaretnam

Job Title: Director

Key Topic: Fats

Sub Topic: Oils, Unsaturated fatty acids, Saturated fatty acids

Attachment: Y

Comment: The purpose of these comments is to request DGAC to consider excluding palmitic acid from dietary recommendations for saturated fatty acids based on the scientific evidence that the source of palmitic acid in foods (vegetable or animal source) has been shown to have different effects on blood lipids and lipoproteins. Please refer to the attached documents.

Comment ID: 002093

Submission Date: 07/15/2010

Organization Type: Nonprofit/Voluntary

Organization Name: Center for Science in the Public Interest

First Name: Margo

Last Name: Wootan

Job Title: Director, Nutrition Policy

Key Topic: Alcoholic Beverages, Carbohydrates, Eating Patterns, Fats, Food Groups, Food Safety, Nutrient Density/Discretionary Calc, Other

Sub Topic: Added sugars, Cholesterol, Fish oil, Omega 3 fatty acids, Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids, Vegetables, Whole grains

Attachment: Y

Comment: The Center for Science in the Public Interest applauds the Dietary Guidelines Advisory Committee (DGAC) for its careful review of the science and generally wise conclusions. Overall, we support the report and urge HHS and USDA to translate the scientific recommendations into 1) policy and environmental changes and 2) a revised understandable and actionable Dietary Guidelines for Americans (DGA) to help people eat more healthfully. In our comments, we focus primarily on maximizing the usefulness of the DGA, and we highlight several concerns about the advisory committee's conclusions.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 002041

Submission Date: 07/15/2010

Organization Type: Nonprofit/Voluntary

Organization Name: American Heart Association

First Name:

Last Name:

Job Title:

Key Topic: Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Fats, Fluid and Electrolytes, Nutrient Density/Discretionary Calc, Protein

Sub Topic: Added sugars, Cholesterol, Fiber, Fish oil, Omega 3 fatty acids, Oils, Unsaturated fatty acids, Saturated fatty acids, Sodium, Trans fatty acids, Whole grains

Attachment: Y

Comment: Please see attached document

Comment ID: 001600

Submission Date: 07/10/2010

Organization Type: Nonprofit/Voluntary

Organization Name: Committee for a Healthy Nation

First Name:

Last Name:

Job Title:

Key Topic: Carbohydrates, Fats

Sub Topic: Glycemic index, Low carbohydrate, Saturated fatty acids

Attachment: Y

Comment: In its Macronutrient Report (2005), the Institute of Medicine concluded that "Compared to higher fat diets, low fat, high carbohydrate diets may modify the metabolic profile in ways that are considered to be unfavorable with respect to chronic diseases such as coronary heart disease (CHD) and diabetes." Despite claiming to base the 2005 Dietary Guidelines on this report, the USDA continued to recommend a diet low in fat and high in carbohydrates. The recommendations are perpetuated in the current proposal. In Section 1, the DGAC considered the relationship between macronutrient proportion and body weight in adults. DGAC concludes that "diets with less than 45% of calories as carbohydrates are not more successful for long-term weight loss (12 months). There is also some evidence that they may be less safe." Our evaluation of the same science does not support this conclusion. The studies that the DGAC reviewed demonstrate that low-carbohydrate diets improve weight loss, as well as coronary disease risk factors. In addition, the Committee does not hold low-fat, high-carbohydrate diets to the same standard of evidence as low-carbohydrate diets; they fail to question the safety and efficacy of low-fat diets. Recent studies that show that low-fat diets fail to demonstrate results and high-fat diets fail to demonstrate risk were not evaluated. In Section 5, the DGAC addresses the relationship between glycemic index/load and body weight, cancer, type 2 diabetes, and heart disease. They looked at studies that compared the effects of high-glycemic index/load foods to low-glycemic index/load foods. Because total carbohydrates have a more significant effect on glucose and insulin levels, the DGAC chose to frame the carbohydrate question in terms that would ensure they found weak or no associations. The inclusion of relevant science would demonstrate the benefit of carbohydrate reduction on diabetes and other chronic diseases.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 002150

Submission Date: 07/15/2010

Organization Type: Nonprofit/Voluntary

Organization Name: EarthSave Miami

First Name: Jeffrey

Last Name: Tucker

Job Title: Chair

Key Topic: Eating Patterns, Evidence-based Review Process, Fats, Food Safety, Nutrient Density/Discretionary Calc

Sub Topic:

Attachment: N

Comment: Please give a consistent message:

On animal foods and disease

On dietary fat and obesity

On dairy products and health

On saturated and trans fats

Please include information which was omitted:

Lactose Intolerance Ignored

Damage from Animal Protein Ignored

Major Sources of Infections Ignored

Please correct these FACTUAL ERRORS:

Plants Are Incomplete Proteins

Plant-Based Diets Are Nutritionally Inadequate

Dairy Products and the Risk of Malnutrition

Eggs Are Safe for the General Public

Fish Is Health Food, Especially during Pregnancy

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001419

Submission Date: 07/08/2010

Organization Type: Nonprofit/Voluntary

Organization Name: Oldways

First Name: Sara

Last Name: Baer-Sinnott

Job Title: President

Key Topic: Eating Patterns, Fats

Sub Topic:

Attachment: Y

Comment: See attachment for comments

Comment ID: 001098

Submission Date: 06/23/2010

Organization Type: Nonprofit/Voluntary

Organization Name:

First Name: Shawn

Last Name: Dady

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: The food pyramid is just awful! Please read the following:

1. The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources.
2. When a healthy food like cheese is singled out as a food to be avoided, there must be something wrong with the premises on which the guidelines are based.
3. Basic biochemistry shows that the human body has a very high requirement for saturated fats in all cell membranes; if we do not eat saturated fats, the body will simply make them from carbohydrates. But excess carbohydrate increases blood levels of triglyceride and small, dense LDL, and compromises blood vessel function. Moreover, high-carbohydrate diets do not satisfy the appetite as well as diets rich in traditional fats, leading to higher caloric intakes and often to bingeing and splurging on empty foods, resulting in rapid weight gain and chronic disease.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

4. The proposed guidelines will perpetuate existing nutrient deficiencies present in all American population groups, including deficiencies in vitamins A and D found in animal fats, vitamins B12 and B6 found in animal foods, as well as minerals like calcium and phosphorus, which require vitamins A and D for assimilation. Moreover, low intakes of vitamin K2, are associated with increased risk of heart disease and cancer. The main sources of vitamin K2 available to Americans are egg yolks and full-fat cheese.

Comment ID: 001188

Submission Date: 06/24/2010

Organization Type: Nonprofit/Voluntary

Organization Name: WAPF

First Name: Rebecca

Last Name: Baker

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources.

2. When a healthy food like cheese is singled out as a food to be avoided, there must be something wrong with the premises on which the guidelines are based.

3. Basic biochemistry shows that the human body has a very high requirement for saturated fats in all cell membranes; if we do not eat saturated fats, the body will simply make them from carbohydrates. But excess carbohydrate increases blood levels of triglyceride and small, dense LDL, and compromises blood vessel function. Moreover, high-carbohydrate diets do not satisfy the appetite as well as diets rich in traditional fats, leading to higher caloric intakes and often to bingeing and splurging on empty foods, resulting in rapid weight gain and chronic disease.

4. The proposed guidelines will perpetuate existing nutrient deficiencies present in all American population groups, including deficiencies in vitamins A and D found in animal fats, vitamins B12 and B6 found in animal foods, as well as minerals like calcium and phosphorus, which require vitamins A and D for assimilation. Moreover, low intakes of vitamin K2, are associated with increased risk of heart disease and cancer. The main sources of vitamin K2 available to Americans are egg yolks and full-fat cheese.

5. By restricting healthy animal fats in school lunches and diets for pregnant women and growing children, the Guidelines perpetuate the tragic epidemic of learning and behavior disorders. The pyramid is a travesty engineered by the food processors!

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001835

Submission Date: 07/13/2010

Organization Type: Nonprofit/Voluntary

Organization Name: The Weston A. Price Foundation

First Name: Sally

Last Name: Fallon Morell

Job Title: President

Key Topic: Fats

Sub Topic: Cholesterol, Saturated fatty acids, Trans fatty acids

Attachment: Y

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources.

Comment ID: 002091

Submission Date: 07/15/2010

Organization Type: Nonprofit/Voluntary

Organization Name: International Food Information Council Foundation

First Name: Marianne

Last Name: Smith Edge

Job Title: Senior Vice President, Food Safety & Nutrition

Key Topic: Fats, Protein

Sub Topic: Fish oil, Omega 3 fatty acids, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids

Attachment: Y

Comment: Please see attached comments submitted by International Food Information Council Foundation.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001638

Submission Date: 07/12/2010

Organization Type: Other

Organization Name: General Mills Inc.

First Name: Kathryn

Last Name: Wiemer

Job Title: Fellow/Director, General Mills Bell Institute of Health & Nutrition

Key Topic: Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Evidence-based Review Process, Fats, Fluid and Electrolytes, Food Groups, Nutrient Density/Discretionary Calc

Sub Topic: Added sugars, Fiber, Fish oil, Omega 3 fatty acids, Grains, Whole grains, Saturated fatty acids, Sodium, Trans fatty acids, Whole grains

Attachment: Y

Comment: Please see attached letter outlining General Mills' comments on the 2010 Dietary Guidelines Advisory Committee's Technical Report. We appreciate the work of the DGAC Committee during the development process. Please contact me with any questions regarding our comments. Kathy Wiemer

Comment ID: 001045

Submission Date: 06/18/2010

Organization Type: Other

Organization Name: Individual citizen with T2 Diabetes

First Name: Barrie

Last Name: Platt

Job Title:

Key Topic: Carbohydrates, Fats

Sub Topic: Low carbohydrate

Attachment: Y

Comment: I am afraid that an individual's comment will not receive the weight it deserves faced with all the input from agribusiness and other food industry interest groups with their resources. Please keep in mind that these guidelines affect the individual US citizen far more than the food industry per se and that it is the citizen for whom they are intended.

It appears that your recommendations are not much different from those issued thirty years ago. This model - which promotes a low fat diet high in complex carbohydrates - has led to a substantial decline in the percentage of energy intake from total and saturated fats in the United States. At the same time, it has spurred an increase in the consumption of refined carbohydrates and added sugars? a dietary shift that is clearly responsible for the current epidemics of obesity and diabetes.

Carbohydrates are traditionally classified as simple or complex, with complex a healthier alternative. However, many complex carbohydrates produce even higher glycemic responses than do simple sugars. Therefore, the term "complex carbohydrates" is not useful in characterizing the quality of carbohydrates. More useful indicators of carbohydrate quality are fiber content and the type and the extent of processing. Highly refined carbs are the enemy.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

The advisory committee does encourage more whole grains and I applaud you for that. Unfortunately, this will not be sufficient to reduce obesity and metabolic disorders nor to improve Americans' health overall. You state, "The macronutrient distribution of a person's diet is not the driving force behind the current obesity epidemic." This conclusion is not based on sound principles of science and nutrition. It is based on dietary myths that have been perpetrated over the last 30 years. We must shift the focus of our dietary guidelines from encouraging restricted fat intake and toward encouraging restricted consumption of carbohydrates, especially refined carbs.

Comment ID: 002116

Submission Date: 07/15/2010

Organization Type: Other

Organization Name: American Council of Fitness and Nutrition

First Name: Alison

Last Name: Kretser

Job Title: Executive Director

Key Topic: Eating Patterns, Energy Balance/Physical Activity, Fats, Fluid and Electrolytes, Food Groups

Sub Topic: Potassium

Attachment: Y

Comment: We welcome the suggestion by the committee to develop a strategic plan to help Americans implement the 2010 Dietary Guidelines for Americans. This would include a standard of education that emphasizes nutrition education and physical activity teaching children energy balance.

Comment ID: 001678

Submission Date: 07/12/2010

Organization Type: Other

Organization Name: EatingWell Media Group

First Name: Nicci

Last Name: Micco

Job Title: Deputy Editor, Features and Nutrition

Key Topic: Eating Patterns, Energy Balance/Physical Activity, Fats, Fluid and Electrolytes, Food Safety

Sub Topic: Fish oil, Omega 3 fatty acids, Other, Saturated fatty acids, Water

Attachment: Y

Comment: On June 21, EatingWell Magazine posted a blog (on EatingWell.com, Shine.yahoo.com and the Yahoo.com homepage) about the dietary guidelines proposed by the Dietary Guidelines Advisory Committee. At the end of the blog, readers were encouraged to respond with comments they wanted to submit to the USDA. The comments ranged greatly and covered topics including eating patterns, energy balance, fats, fluids and food safety. We've summarized the commenters' concerns below. (We've also attached a document that includes all comments relevant to the dietary guidelines.) Please note that these -unedited- comments do not necessarily represent the position of EatingWell Magazine or its editors.

*Several readers emphasized the need for more consistency and clarity on portion sizes. They complained that the word "moderate" seemed too vague. One reader suggested

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

that the guidelines should provide more information on how to calculate caloric needs and intake.

*An overwhelming number of people suggested that the guidelines should encourage whole, natural foods over artificial ones. Many comments also addressed the idea that healthy foods (e.g., fruits and vegetables) are considerably more expensive than processed foods. Several readers requested that the guidelines mention that grass-fed cattle produce meat and dairy products that are lower in saturated fat and higher in omega-3s than corn-fed cattle.

*There were a few suggestions related to fluid intake. One suggestion was to include a water recommendation in the guidelines because drinking water may help maintain good health and can assist in controlling hunger. Some readers mentioned that sugar-laden beverages should be discouraged because they lead to weight gain.

*Food safety was a popular theme. Some issues readers wanted the guidelines to address: contaminated seafood (and the sustainability of fishing practices), chemical additives in foods, growth hormones, MSG, high-fructose corn syrup, pesticides and artificial sugars.

Comment ID: 002097

Submission Date: 07/15/2010

Organization Type: Other

Organization Name: Monsanto Co. and Solae LLC

First Name: Shawna

Last Name: Lemke, Ph.D.

Job Title: Global Human Nutritionist

Key Topic: Eating Patterns, Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: Dear Secretaries Vilsack and Sebelius:

We acknowledge the effort put forth by the Dietary Guidelines Advisory Committee (DGAC) in evaluating the current science to prepare this report that will be utilized by the USDA and HHS to develop 2010 Dietary Guidelines for Americans. We appreciate the opportunity to submit comments on dietary fats, in particular importance of omega-3 fatty acids.

The DGAC Report on fatty acids and cholesterol concludes there is moderate evidence that consumption of seafood omega-3 fatty acids, specifically the long-chain polyunsaturated fatty acids (LCPUFA), EPA and DHA, have a positive impact on heart health. The DGAC, however, notes there is only limited evidence that intake of the plant-based omega-3 fatty acid, ALA, has a benefit on the risk of cardiovascular disease. Furthermore, the DGAC states that there is an increased need for consumption of seafood omega-3 fatty acids, "unless plant-derived sources of EPA or DHA can be developed".

The US populations' dietary intake of LCPUFAs continues to be far below what would be considered adequate for optimal health. The key to increasing LCPUFA intake may be to encourage intake of a wider range of foods providing omega-3 fatty acids that convert efficiently to LCPUFAs and suit their usual dietary habits and fit within their budgets.

In addition to EPA and DHA, stearidonic acid (SDA) may be beneficial in increasing intakes of omega-3 fatty acids. Emerging evidence suggests SDA enriched soybean oil is more efficiently converted to EPA than ALA. The biological effects of SDA have been assessed; a growing number of studies indicate that SDA compares favorably with the effects of dietary EPA.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

We encourage review of current dietary patterns as well as potential alternative sources of omega-3 fatty acids, such as SDA soybean oil, to provide Americans guidance that enables them to reach target intakes.

Respectfully,

Shawna Lemke, Ph.D.
Global Human Nutritionist
Monsanto Co

Comment ID: 001092

Submission Date: 06/23/2010

Organization Type: Other

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Eating Patterns, Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: The Guidelines are not based on science but are designed to promote the products of commodity agriculture and-through the back door-encourage the consumption of processed foods. By demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking, the current obesity epidemic will only get worse. Vegetable oils and refined carbohydrates are to blame for the problems you pin on these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001190

Submission Date: 06/24/2010

Organization Type: Other

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: I find it interesting that traditional societies ate saturated animal fats as the main part of their diets for 40,000 years...we are the same genetically as they were...why all of a sudden are animal fats bad? Ever since we have been told to avoid them we are sicker and fatter than our ancestors...even our grand parents did not suffer from the diseases that our children are suffering from...they ate real food including butter, redmeat and whole milk...I think this is all a nod and a wink to the big food corporations telling the masses to keep eating their highly processed ,nutrient deficient, chemicalized foods...where is the research? University of Maryland checked the studies used to make these claims and it was vegetable fats that were associated with high rates of cancers, animal fat was not....whoever came up with these guidelines should know that they are making our population sick.

Comment ID: 001150

Submission Date: 06/23/2010

Organization Type: Other

Organization Name:

First Name: Jim

Last Name: Coyle

Job Title:

Key Topic: Fats

Sub Topic: Cholesterol, Saturated fatty acids

Attachment: N

Comment: Generation upon generation of our ancestors before us ate foods that contained saturated fats and cholesterol. Butter, Coconut Oil, Lard, Eggs, and Cheese have been consumed by healthy people all over the world for thousands of years. Continued studies funded by the processed food industry are obviously bias against these foods. The true science shows that modern foods loaded with processed vegetable oils, sugar, and salt are directly responsible for the poor health inflicting people today. Government agencies are nothing more that front groups for the multi-billion dollar agricultuaral and food industry that puts control and profits over our health.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001251

Submission Date: 06/26/2010

Organization Type: Other

Organization Name:

First Name: Frances

Last Name: Pane

Job Title:

Key Topic: Fats

Sub Topic: Cholesterol

Attachment: N

Comment: There are many studies that show "low fat" dairy items are unhealthful, especially for pregnant women. Condemning meat and dairy fats (also palm and coconut oil) as "solid fats" and therefore bad is outrageous and WRONG! For millions of years of ancestors ate those "solid fats"! As for banning foods high in cholesterol, it is a fact that foods high in cholesterol do not raise your cholesterol level. Who is doing the research for this? The food manufacturing industry that want to sell us "low fat" junk! With recommendations like this, 100% of Americans will be overweight or obese!

Comment ID: 001430

Submission Date: 07/08/2010

Organization Type: Other

Organization Name: Martek Biosciences Corporation

First Name: Rodney

Last Name: Gray

Job Title: Vice President, Regulatory Affairs

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: We thank you for the opportunity to provide input to the final 2010 Dietary Guidelines for Americans. We ask that consideration in the final DG document be given to: 1. a list of sources beyond various fish that serve as meaningful contributors to DHA or DHA+EPA intake to allow consumers a broader array of choices and possibly increase compliance with DG recommendations; 2. use of the term "fish and shellfish, particularly fatty fish" in place of "seafood" to highlight the variety of fish available and emphasize those fish with the highest DHA+EPA contents and 3. direct translation of the DGAC's 250 mg/d DHA+EPA recommendation along with their fish and shellfish recommendation so that consumers can recognize these important nutrients rather than just a source of them and gauge the contribution of other foods and dietary supplements to their needed intake of these important fatty acids.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001357

Submission Date: 07/05/2010

Organization Type: Other

Organization Name: Healthy Transitions

First Name: Misty

Last Name: Humphrey

Job Title: Holistic Nutrition Educator

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: Saturated fatty acids are beneficial for the building and maintenance of hormones. Never have we had such an infertility issue as we have now. I am disgusted by the lack of lipid research this agency actually does. Has no one ever read the writings of Dr. Mary Enig? There is study after study implicating saturated fats as health optimizing and the polyunsaturates as inflammatory, cancer causing agents. Look back in time where there was little to no cancer, heart disease, diabetes, obesity and infertility. What did we consume then? lard, tallow, and animal proteins. The advent of crisco et al is the beginning of health demise. Sodium is delivered in the form of processed foods but until our FDA pulls their heads out of big pharma and big food, these dietary guidelines will only continue to make the general public more ill and consequently more obese completely bankrupting this country. With butter as my witness, these guidelines only make us sicker.

Comment ID: 001088

Submission Date: 06/23/2010

Organization Type: Other

Organization Name:

First Name: Bret

Last Name: Shulman

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001117

Submission Date: 06/23/2010

Organization Type: Other

Organization Name:

First Name: Kathleen

Last Name: Reilly

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: The guidelines are not properly researched -- they lump trans fats with the very healthful and beneficial saturated fats (from healthful sources). They promote too much grain (with no emphasis on proper prep of the grain) and do not promote reduction of sugar enough. Villainizing a healthy food like real cheese is a mistake in the guidelines. These well meaning guidelines do nothing more than The Guidelines are not based on science but are designed to promote the products of commodity agriculture and-through the back door-encourage the consumption of processed foods. Please consult legitimate, science based organizations like the Weston Price Foundation. Your guidelines would make me become unhealthy.

Comment ID: 001119

Submission Date: 06/23/2010

Organization Type: Other

Organization Name:

First Name: Carolyn

Last Name: Bjornson

Job Title:

Key Topic: Fats

Sub Topic: Cholesterol

Attachment: Y

Comment: See attached

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001122

Submission Date: 06/23/2010

Organization Type: Other

Organization Name:

First Name: Rosanne

Last Name: Lindsay

Job Title: Writer

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: Please do not support the new 2010 Dietary Guidelines which will only take a growing health crisis and make it worse!

From beginning to end, these guidelines will do more harm than any good. There is no evidence, for instance, that saturated fats (coconut oil, cod liver oil, grass-fed butter) harm anyone, so why put harmful "trans fats" in the same "saturated fats" grouping? In fact, any connection between saturated fats and heart disease has already been disproven by science. In addition....

1) The vitamins and fatty acids carried uniquely in saturated animal fats are critical to reproduction. The 2010 Guidelines will increase infertility in this country, already at tragically high rates.

2). The Guidelines are not based on science but are designed to promote the products of commodity agriculture and-through the back door-encourage the consumption of processed foods.

3). The Guidelines promote the consumption of whole grains, which can contribute to digestive disorders unless properly prepared. Note the growing prevalence of gluten sensitivity and Celiac's Disease in all age groups.

4). The Guidelines completely avoid mentioning blood sugar problems caused by a diet high in carbohydrates and low in fat; the diet is particularly dangerous for those suffering from diabetes or hypoglycemia, since fats help regulate blood sugar levels. Many people have difficulty concentrating or can even suffer from seizures on a diet too low in fat.

5). The Guidelines urge salt restriction, which will lead to an increased use of artificial flavors like MSG in processed foods.

6). The Guidelines should be scrapped and the committee members should be replaced with individuals who have no ties to the food processing industry or to universities that accept funding from the food processing industry. This oversight is a significant conflict of interest.

Due to these and other reasons, the USDA must throw out this paradigm and go back to the drawing board. Just look around! The current epidemic of chronic disease is a testament to the current guidelines and food pyramid. Why continue down the same disease producing path?

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 001103

Submission Date: 06/23/2010

Organization Type: Other

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources.

There is also no mention of trans fats which need to be taken out of our food -- even with the loophole that allows .5% to = 0.

Comment ID: 001104

Submission Date: 06/23/2010

Organization Type: Other

Organization Name:

First Name: Catherine

Last Name: Mockus

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: Please scrap the plans for the horrific dietary guidelines. I received a degree in nutrition in 1987 but thankfully was open enough to keep reading and studying after that and realized that most everything I was taught was scientifically incorrect and dangerous. The same is true with the proposed 2010 Dietary Guidelines which perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources. When a healthy food like cheese is singled out as a food to be avoided, there must be something wrong with the premises on which the guidelines are based. Basic biochemistry shows that the human body has a very high requirement for saturated fats in all cell membranes; if these are not eaten, the body will simply make them from carbohydrates. But excess carbohydrate increases blood levels of triglyceride and LDL, and compromises blood vessel function. Also, high carb diets do not satisfy the appetite as do diets rich in traditional

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

fats, leading to higher caloric intakes, bingeing and splurging on empty foods, resulting in rapid weight gain and chronic disease. The proposed guidelines will perpetuate existing nutrient deficiencies present in all American population groups, including deficiencies in vitamins A and D, vitamins B12 and B6, as well as minerals like calcium and phosphorus, which require vitamins A and D for assimilation. Low intakes of vitamin K2 are associated with increased risk of heart disease and cancer. The main sources of vitamin K2 available to Americans are egg yolks and full-fat cheese. I could go on and on but there isn't enough room here. Makes me wonder if the government is intentionally trying to kill us as the science DOES NOT support these health defying guidelines.

Comment ID: 002023

Submission Date: 07/15/2010

Organization Type: Other

Organization Name: The Hershey Company

First Name: Daniel

Last Name: Azzara

Job Title: Vice President Global Research & Development

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: Please refer to attachment for comments

Comment ID: 001732

Submission Date: 07/12/2010

Organization Type: Other

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Fats

Sub Topic: Other

Attachment: N

Comment: I am so far quite dismayed to read your conclusions about dietary guidelines. On the one hand you recognize the increasing problem of obesity, diabetes, heart disease, and cancer. But on the other hand, you fail to take seriously the role of nutrition in these diseases. If your purpose is simply to give a green light to the food industry to continue the current trends, then I don't know why you are bothering to "not address" a problem that needs addressing.

Saturated fats and trans fats have a reputation for causing serious illness, including atherosclerosis and cancer, and the safety of stearic acid and rTFA is unproven. At the very least they contribute to obesity. The reason for dedicating so much space to defending these two cow-derived fats can only be interpreted as a special concession from the

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

committee to the cattle industries.

Comment ID: 001913

Submission Date: 07/14/2010

Organization Type: Other

Organization Name: Program for Infarct Prevention in Argentina

First Name: Julio Marcelo

Last Name: Tavella

Job Title: General Director

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: We applaud the recommendations of the DGAC regarding a new classification of fatty acids concerning more on the cholesterol effect (raising or non raising) than in the traditional chemical classification. This will allow consumers to differentiate in a very easy way the stearic acid from the other saturates and will broaden the spectrum of appealing foods providing that stearic acid is the only one that yields solid ?fats? that are needed in many food applications.

Comment ID: 001922

Submission Date: 07/14/2010

Organization Type: Other

Organization Name: Lodders Croklaan NA

First Name: Gerald

Last Name: McNeill

Job Title: VP of Research and Development

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: Committee conclusions on the effects of stearic acid compared to other saturates rely heavily on 2 studies by thijssen et al. which can be shown to be seriously flawed. Have the reviewers screened other studies for these problems. Consideration to adopt any stearic acid recommendations from the committee must be treated with great caution.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 002109

Submission Date: 07/15/2010

Organization Type: Other

Organization Name:

First Name: Karen

Last Name:

Job Title:

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: I am appalled and disappointed that such intelligent people all in one room can't come up with a better solution to obesity and rampant disease than the one they have been presenting for years--that same one which is at the root cause of this epidemic! For centuries there was no heart disease, obesity was not common place and people died of natural causes--not cancer. What did they eat? Fat, fat and more fat! Sugar was something of a treat that was rarely indulged in! Why not stop trying to reinvent the wheel and get back to eating real meat, eggs, fat and whole raw milk the way God intended. Oh yes that would mean big business for local farmers and not so much for factories producing meat and "vegetables". Maybe that is the concern. Or maybe the fact that if people started eating good fats and less rancid grain and sugary, packaged foods, the drug industry would go down the drains! We must start looking at the what has worked in the past and get back to basics instead of continuing this vicious cycle. This recommendation fits right in with the definition of insanity, according to Einstein: "The definition of insanity is doing the same thing over and over again and expecting different results".

Comment ID: 002139

Submission Date: 07/15/2010

Organization Type: Other

Organization Name: Loders Croklaan NA

First Name: Gerald

Last Name: McNeill

Job Title: VP R&D

Key Topic: Fats

Sub Topic:

Attachment: Y

Comment: otocols in dietary studies lead to wrong conclusions about the role fo saturated fats and stearic acid in risk of CVD

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 002105

Submission Date: 07/15/2010

Organization Type: Professional Association

Organization Name: American Dietetic Association

First Name:

Last Name:

Job Title:

Key Topic: Alcoholic Beverages, Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Evidence-based Review Process, Fats, Fluid and Electrolytes, Food Groups, Food Safety, Other, Protein, Vitamins

Sub Topic:

Attachment: Y

Comment: The American Dietetic Association is pleased to provide the attached comments on the translation of the Dietary Guidelines Advisory Committee report into the 2010 Dietary Guidelines for Americans.

Comment ID: 002011

Submission Date: 07/15/2010

Organization Type: Professional Association

Organization Name: American Public Health Association

First Name: Donald

Last Name: Hoppert

Job Title: Director, Government Relations

Key Topic: Alcoholic Beverages, Eating Patterns, Energy Balance/Physical Activity, Fats

Sub Topic:

Attachment: Y

Comment: Please find attached the American Public Health Association's comments regarding the final Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans, 2010.

Comments Summary Report

Submission Date Between 06/15/2010 and 07/30/2010

Key Topic: Fats

Comment ID: 002121

Submission Date: 07/15/2010

Organization Type: State/Local Government Agency

Organization Name: Boston Public Health Commission

First Name: Lisa

Last Name: Conley

Job Title: Director of Intergovernmental Relations

Key Topic: Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Fats, Nutrient Density/Discretionary Calc, Other

Sub Topic: Added sugars, Other, Saturated fatty acids, Weight loss

Attachment: Y

Comment: The Boston Public Health Commission commends the work of the DGAC in attempting to distill a large and often contradictory body of scientific evidence into a comprehensive set of guidelines that for the first time move beyond individual behavior to policy and environmental systems change. We appreciate the Committee's recognition of the severe health threat posed by the increasing rates of obesity and overweight in American communities, and especially the racial inequities in the factors contributing to obesity and related chronic disease; the disparities in rates of obesity and overweight by race and ethnicity are also increasing. As the recipient of Communities Putting Prevention to Work funding from the CDC, BPHC is strongly committed to working in partnership with our local communities and the federal government to utilize the best science to create healthier environments for nutrition and physical activity for all neighborhoods in Boston. BPHC agrees with the Dietary Guidelines Advisory Committee that reducing obesity and chronic disease requires a "coordinated system-wide, multi-sectoral approach" that engages "those in education, government, healthcare, agriculture, business, advocacy and the community" with a fundamental emphasis on primary prevention. We urge the committee to move quickly from advice to an action plan with funding and local government and community partnership.