and appropriate weight management, is key to a healthy lifestyle and is essential to cardiovascular – and overall – health.

AHA offers the following comments for consideration by the Dietary Guidelines Advisory Committee as it prepares its recommendations. AHA's comments are largely based on the Association's scientific statement Diet and Lifestyle Recommendations: Revisions 2006 (See Attachment A).

Carbohydrates

Added Sugars
The Dietary Guidelines should set a limit on intake of added sugars. Added sugars are a significant source of empty calories and may be associated with greater overall calorie intake, higher body weights, and lower intakes of essential nutrients. Excess sugar consumption has also been linked to several metabolic abnormalities and adverse health conditions.

No more than one-half of discretionary calories should come from added sugars. The limit for most women would be no more than 100 calories per day and no more than 150 calories for men.

Fiber
The Dietary Guidelines should emphasize food-based sources of fiber. Consumption of high fiber foods such as legumes, whole-grain products, and fruits and vegetables will help individuals meet the Guidelines in their entirety. Dietary fiber may also promote satiety, leading to an overall decrease in calorie intake.

Whole Grains
The Committee should make a point to recommend a decrease in consumption of refined grains such as white bread and white rice and continue with previous advice to keep at least half of all grains whole. The Guidelines should encourage individuals to replace refined carbohydrates with whole grains with specific examples of foods to consume.

The Dietary Guidelines Advisory Committee should also recommend in its report to the federal agencies that they develop a single definition for whole grains that is easily understood by consumers and can be adopted for use by the food industry.

Protein
The current Dietary Guidelines address the consumption of meat, poultry, and fish as a combined food group. AHA strongly urges the Advisory Committee to place an increased emphasis on the consumption of fish; fish should be featured as a major source of protein. AHA recommends the consumption of fish, especially oily fish, at least twice a week. Oily fish is rich in long-chain omega-3 polyunsaturated fatty acids and the consumption of two servings per week has been associated with a reduced risk of both sudden death and death from coronary artery disease.

The recommendations should also emphasize non-animal-based sources of protein such as legumes and beans. Consumption of plant-based sources of protein may facilitate the displacement of other foods from the diet such as fatty meats.

In addition, the Advisory Committee should be explicit in its recommendations and any guidance pertaining to "lean" meats should be clarified so that it's clear whether the term "lean" refers to the regulatory definition of lean (less than 10g total fat, 4.5g or less saturated fat, and less than 95mg of cholesterol) or simply the leanest cut of meat available.

The Advisory Committee should recommend the consumption of "extra lean" meats. Extra lean should be defined using the regulatory definition of seafood or game meat products that contain less than 5g total fat, less than 2g saturated fat, and less than 95mg cholesterol per RACC.

It is important that the policy document which follows the DGAC report translates recommendations to eat "lean" or "extra lean" servings of meat in a useful manner for consumers. For example, it is not clear that the discretionary calorie allowance is calculated based on the assumption that an individual is consuming "lean" meats or the most nutrient-dense forms of foods throughout the day. The recommendations should address the health and caloric benefits of eating "lean" or "extra lean" meats rather than full fat versions.

Fats

Saturated Fatty Acids

The current Guidelines recommend that individuals should consume less than 10% of calories from saturated fatty acids. Based on scientific evidence, 10% is too high for heart health. AHA urges the Committee to consider revising the current recommendation to less than 7% of energy from saturated fats.

Trans Fatty Acids

The current Guidelines recommend that *trans* fatty acid consumption be kept "as low as possible". While AHA supports keeping *trans* fat consumption as low as possible, we are concerned that this recommendation is too vague. In order to help consumers incorporate this recommendation into their diet, we suggest revising the language to include a specific amount of *trans* fats that should not be exceeded. AHA recommends that *trans* fat consumption be as low as possible, but no more than 1% of energy; this equates to a maximum of 3 grams per day based on a 2,000 calorie diet.

Omega-3 Fatty Acids

As described above, scientific evidence supports recommending two servings per week of fish high in eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA). Intake of these omega-3 fatty acids has been associated with a decreased risk of cardiovascular disease. We urge the Committee to make this recommendation.