

# Comments Summary Report

Submission Date Between 10/29/2008 and 01/23/2009

Key Topic: Other

**Comment ID:** 000223

**Submission Date:** 01/23/2009

**Organization Type:** Educational Institution

**Organization Name:** University of North Dakota Energy & Environmental Research Center

**First Name:** Nicholas

**Last Name:** Ralston

**Job Title:** Health Effects Research Program Leader

**Key Topic:** Eating Patterns, Evidence-based Review Process, Food Safety, Minerals, Other

**Sub Topic:** MyPyramid

**Attachment:** Y

**Comment:** One of the most important decisions that your committee will make is determining what questions to address in your evidence-based reviews. Your committee will be interested in how advances in understanding of selenium's physiological functions clarify the benefits and risks of seafood consumption. Ocean Fish are among the richest sources of dietary selenium, an element that has proven to counteract adverse effects of mercury, these findings make it much easier to understanding the benefits of seafood consumption in improving cardiovascular and neurodevelopmental outcomes. Your committee will also want to understand why the uniquely high binding affinity between mercury and selenium (a million times higher than that of sulfur, mercury's next best binding partner) clears up many mistaken ideas regarding seafood safety issues related to mercury exposure.

Evidence from the human and animal studies of this issue uniformly indicate that exposure to mercury in molar excess of selenium is harmful, but no harmful effects are evident when seafoods containing nutritionally relevant amounts selenium in molar excess of selenium (Ralston, 2009). Instead of harm, the largest and most recent studies find increasing beneficial effects (up to 10 IQ points) in children whose mothers consumed increasing amounts ocean fish during pregnancy (Lederman et al., 2008; Hibbeln et al., 2007; Oken et al., 2007). These findings had been thought to be surprising by those that don't understand mercury-selenium interactions, but, like all other aspects of the issue, are easy to understand when considered from the perspective of selenium physiology (Ralston 2009). The effects of mercury are not proportional to exposure, but are instead directly associated with mercury-selenium molar ratios.

# Comments Summary Report

*Submission Date Between 10/29/2008 and 01/23/2009*

**Key Topic: Other**

**Comment ID:** 000049

**Submission Date:** 10/31/2008

**Organization Type:** Educational Institution

**Organization Name:** Green Village Philadelphia

**First Name:** William

**Last Name:** Marston

**Job Title:** Sustainability Officer and Vice Chair

**Key Topic:** Other

**Sub Topic:**

**Attachment:** N

**Comment:** It is essential that humanity move away from use of land for "consumption", as though it could be used as a consumable. But this is how our economic and government practices guide human attitudes toward land - that it is more like a product, or a machine, just an element in our human-centered lives. The Food Guide must be re-defined in a realistic, principle-based ecologically rooted way. We recommend that the Food Guide be re-framed to reflect throughout that it food is part of the ecological cycle of life on earth. Biomimetics is the science by which humans learn from nature to apply principles to things and systems that humans invent and build. Hydroponics and ?living machines? which recycle human wastes into living systems are contained cycle examples of this. Wholistic or ?integrated medicine? approaches are examples of this in healthcare. No action on changes to the Food Guide should be made until a succinct set of principles are adopted as Public Policy which are rooted in a land ethic and a holistic approach.

These should include a ?waste equals food? understanding of the inter-dependencies of natural cycles, and of the integral nature of the compounding interaction of foods and other environmental factors on human health.

Thank you for hearing this plea for a liveable future.

Wm J Marston, LEED AP Philadelphia 215-557-9445

# Comments Summary Report

Submission Date Between 10/29/2008 and 01/23/2009

Key Topic: Other

**Comment ID:** 000089

**Submission Date:** 12/08/2008

**Organization Type:** Educational Institution

**Organization Name:**

**First Name:**

**Last Name:**

**Job Title:**

**Key Topic:** Other

**Sub Topic:**

**Attachment:** N

**Comment:** As an educator, I liked the 2000 guidelines, because the were and easy teaching tool. I would appreciate that again.

**Comment ID:** 000070

**Submission Date:** 11/18/2008

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** John

**Last Name:** Morris

**Job Title:** Biologist/Nutrition Advocate

**Key Topic:** Carbohydrates, Eating Patterns, Evidence-based Review Process, Food Groups, Other, Protein

**Sub Topic:** Added sugars, Fruits, Other, Vegetables

**Attachment:** N

**Comment:** Please consider an evidence-based review on how diets consisting of mainly plant-based, raw whole foods results in better health while those that continue to follow recommendations to overindulge in high amounts of animal protein (dairy, eggs and meat) continue to see a rise in disease.

Please address the fact that all greens, vegetables and fruit have protein? There is great need to educate that one does not need to consume animal products to get the protein needed for good health.

Also, consider addressing the elimination of all added sugars, in addition to the evidence of their health detriment, they provide no known added nutritional value.

# Comments Summary Report

Submission Date Between 10/29/2008 and 01/23/2009

Key Topic: Other

**Comment ID:** 000122

**Submission Date:** 01/09/2009

**Organization Type:** Individual/Professional

**Organization Name:** Preventive Nutrition Services

**First Name:** Mark

**Last Name:** Rifkin

**Job Title:** Registered Dietitian

**Key Topic:** Carbohydrates, Eating Patterns, Fats, Food Groups, Other, Protein

**Sub Topic:** Added sugars, Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, MyPyramid, Oils, Unsaturated fatty acids, Vegetables, Whole grains

**Attachment:** Y

**Comment:** Thanks for the opportunity to submit comments to the DGAC. As a registered dietitian, I see first hand how little Americans understand about nutrition, and the subsequent effects. Because the DGAC can no longer assume the average American is healthy, the Dietary Guidelines must be more aggressive in establishing a standard of appropriate intake. Specifically, the DGAC must take a more aggressive approach in recommending foods that can prevent and/or treat obesity, CVD, stroke, diabetes, renal disease, some types of cancer, osteoporosis, and other conditions associated with poor dietary habits. According to the preponderance of the data, these foods are fruits, vegetables, whole grains, beans, nuts and seeds. In other words, it's time to use the term "plant-based" or "plant-centered" as the key dietary guideline.

**Comment ID:** 000045

**Submission Date:** 10/29/2008

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Tim

**Last Name:** Lawton MD

**Job Title:** Physician

**Key Topic:** Carbohydrates, Fats, Nutrient Density/Discretionary Calc, Other

**Sub Topic:** Added sugars, Other, Trans fatty acids, Whole grains

**Attachment:** N

**Comment:** The most obvious error in the current pyramid is the phrase "make half your grains whole." There is no known health benefit to consuming any refined grains. I recommend to my patients and to lecture audiences that they minimize refined grains and make most, if not all of their grains "whole." Consumption of refined grains requires less chewing, thereby facilitating overconsumption. Refined grains have a higher glycemic index, raising blood sugar, insulin levels, triglyceride levels and risk of obesity and diabetes. Perhaps making 90% of our grains whole would be a better goal. American consumption of refined sugar is nearly 20% of calories. Limiting refined sugar intake to <5% would be a healthier goal. A 50% reduction of added salt by the food industry would make a tremendous impact in the prevalence of hypertension, stroke and heart disease. The current labeling laws allow for any food containing <0.5 gm of trans fat to claim "zero trans fat per serving." This is misleading. Food containing any trans fat should be labeled to reflect the true amount.

# Comments Summary Report

Submission Date Between 10/29/2008 and 01/23/2009

Key Topic: Other

Our current global epidemic requires drastic and immediate action, perhaps through industry initiatives in cooperation with governmental legislation. If the U.S. can get a handle on our current epidemics, we can be a beacon for the world to follow.

As McDougall, Diehl, Esselstyn, Barnard and Kelly have pointed out, a nationwide reduction of meat and animal fat is also critical. Our government's policies should reflect sound nutritional science and should not subsidize the production of items such as sugar, corn syrup and high-fat meats, all of which contribute to a variety of diseases, decrease the quality of life for many Americans, reduce economic productivity, increase medical expenses, morbidity and mortality.

One final suggestion: Scrap the pyramid design and use a target format to help clarify which nutrient-dense whole foods belong at the bulls-eye and which less healthy foods miss the mark.

**Comment ID:** 000162

**Submission Date:** 01/19/2009

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:**

**Last Name:**

**Job Title:**

**Key Topic:** Carbohydrates, Other

**Sub Topic:** Added sugars

**Attachment:** N

**Comment:** too many added sugars in our food. frequently, they are added in as so many disguises, i really love the "evaporated cane juice"....I pretty much avoid most restaurant and processed food due to added sugars and the icky aftertaste and after smell of people who consume "natural flavorings". we need to discourage restaurant and processed food and encourage whole foods. brown rice, fresh fruits, fresh vegetables. completely avoid any meat, eggs, dairy that comes from giant factory farms that are fed corn (so why is 50% of our population obese? we are consuming corn, corn, corn), stuffed in tiny, filthy cages, and force fed antibiotics and growth hormones. I would like access to meat, dairy, egg products that come from organic farms that are humanely raised out doors, free range, that is labeled free of artificial hormones and antibiotics and humanely euthanized. Right now, access to these products is difficult as organic meats, dairy, eggs, food is intentional misleadingly labeled. the consumer wants wholesome, organic veg, meats, dairy, fruit, but it is prohibitively priced!! sorry I got off the topic..

# Comments Summary Report

Submission Date Between 10/29/2008 and 01/23/2009

Key Topic: Other

**Comment ID:** 000164

**Submission Date:** 01/20/2009

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Lawrence

**Last Name:** Machtinger

**Job Title:** Pathologist

**Key Topic:** Eating Patterns, Food Groups, Food Safety, Other

**Sub Topic:** Meat, Beans, Eggs, Fish, and Nuts

**Attachment:** N

**Comment:** Dietary guidelines should promote a plant-based diet, which reduces rates of many cancers and vascular diseases. Eating animal products has been correlated to an increased incidence of these diseases. It would improve the overall health of Americans to drastically reduce meat consumption. A plant-based diet is one of the single most effective ways to fight global warming. Livestock production is responsible for 18% of greenhouse gas emissions, higher than that emitted by all the world's vehicles. Animal agriculture releases 37% of all human-induced methane and 65% of all human induced nitrous-oxide, potent greenhouse gases. Animal agriculture produces almost 2/3 of all human-induced ammonia emissions, contributing to acidification of ecosystems. It promotes the current epidemic of antibiotic-resistant bacteria. About 25 million lbs. of antibiotics are fed to U.S. livestock annually, almost 8 times the amount administered to humans in this country. This has promoted the spread of multi-drug resistant bacteria that are killing tens of thousands of Americans each year. Antibiotics are being rendered useless in order to increase livestock profits, putting all of us at risk. Animal agriculture also leads to enormous environmental degradation, pollution and waste of ever dwindling water supplies. The poor conditions of animals kept on factory farms are a breeding ground for infectious diseases that sicken or kill hundreds of thousands of Americans annually. From an ethical perspective, the current animal agricultural system causes immense suffering to the 10 billion animal slaughtered for food in the U.S. every year. This cruel system exists to maximize profits while producing cheap meat. Americans already consume far too much meat for their own good. If America's farmers were required to provide their animals truly humane living conditions, cheap meat would simply not exist. The price of meat has been driven down to unnaturally low levels through appalling factory farming methods, transforming what once was a luxury item into a staple of the diet, to the detriment of people, animals and the planet.

# Comments Summary Report

*Submission Date Between 10/29/2008 and 01/23/2009*

**Key Topic: Other**

**Comment ID:** 000142

**Submission Date:** 01/16/2009

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Sara

**Last Name:** Campbell

**Job Title:**

**Key Topic:** Eating Patterns, Food Groups, Other

**Sub Topic:**

**Attachment:** N

**Comment:** I think more Americans need to be made aware of the benefits of a plant-based diet. I am not a professional. I know very little about nutrition. I do know that in October of 2008 I decided to switch to a vegan diet. Within 3 months I lost 21 pounds. I eat often and I eat well. I actually have the energy to exercise. My mood has improved. Too many times the public is told they must include meat and dairy in their diet. Every year there is more evidence that diets based on animal products are harmful. More care should be taken to provide information about plant based diets and their benefits.

**Comment ID:** 000146

**Submission Date:** 01/17/2009

**Organization Type:** Individual/Professional

**Organization Name:** Wellness Formulations, LLC

**First Name:** Nicholas

**Last Name:** Pokoluk

**Job Title:** Director of Research and Development

**Key Topic:** Eating Patterns, Minerals, Other, Protein

**Sub Topic:**

**Attachment:** N

**Comment:** There is a need to ensure individuals know that such important nutrients such as calcium and protein can be gotten from non-animal sources. There is a tendency to make the narrow position for these dietary components as coming from animal sources when they can easily be gotten other ways. Just because it is easy to get them from meat and dairy does not mean it is the BEST way to get these nutrients. Low fat animal products can be seen as health neutral but vegetables are health positive. The benefits of a isocaloric vegan versus animal based diet is incontrovertible! The public must be made aware of this for their health benefit and the benefit of the health care system's viability. To do otherwise would be an injustice.

# Comments Summary Report

*Submission Date Between 10/29/2008 and 01/23/2009*

**Key Topic: Other**

**Comment ID:** 000160

**Submission Date:** 01/19/2009

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Cathy

**Last Name:** Ng

**Job Title:** Student

**Key Topic:** Fats, Food Safety, Other

**Sub Topic:**

**Attachment:** N

**Comment:** While the 2005 Dietary Guidelines depict nutritional values found in food groups in an American diet, the guidelines have never explicitly discouraged any specific types of food or the manner in which food is prepared. In fact, there is no mention, much less a warning, on any foods that contain or promote the formation of toxins called AGEs (advanced glycation end products), commonly found in brown or fried foods (such as cakes, bacon, etc.) where sugars are added to molecules nonenzymatically, exacerbating diabetes, obesity, and chronic diseases associated with aging through destructive cellular damage. Although AGEs occur naturally, they are also absorbed into the body through consumption of foods that already contain AGEs, such as grilled, fried, or broiled food products (i.e. meats and cheeses). Other foods promote the formation of AGEs within our bodies once consumed, such as sterilized and pasteurized food products, and foods that contain high-fructose corn syrup. While these are two distinct risks, both types lead to an accumulation of AGEs in our bodies. However, the guidelines continue to encourage "moderate" intake of fats and sugars, statements that remain relatively broad and consequently too lenient in setting effective measures in food preparation to promote health.

Because the Dietary Guidelines serve as the foundation for government nutrition programs such as MyPyramid, a readily accessible icon of federal standings on dietary requirements for consumers, it is essential that the guidelines mention the importance of the quality and origin of foods. This consequently includes a federal commentary on foods that promote AGEs. As the current guidelines have been rather ambiguous in addressing the role of food preparation, the 2010 Dietary Guidelines should employ appropriate language in order to deliver the most effective advice promoting health.



# Comments Summary Report

Submission Date Between 10/29/2008 and 01/23/2009

Key Topic: Other

**Comment ID:** 000185

**Submission Date:** 01/22/2009

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Debra

**Last Name:** Yanulevich

**Job Title:** school librarian

**Key Topic:** Other

**Sub Topic:**

**Attachment:** Y

**Comment:** too much corn syrup in products

**Comment ID:** 000096

**Submission Date:** 12/18/2008

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Tom

**Last Name:** Gray

**Job Title:**

**Key Topic:** Other

**Sub Topic:**

**Attachment:** N

**Comment:** It is my hope that the committee will not overlook the information on diabetes presented by Dr. Richard Bernstein in "The Diabetes Solution." It appears that this book contains valuable information for diabetics, which can also be quite useful to non-diabetics.  
Sincerely, Tom Gray

# Comments Summary Report

Submission Date Between 10/29/2008 and 01/23/2009

Key Topic: Other

**Comment ID:** 000063

**Submission Date:** 11/09/2008

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Jacqueline

**Last Name:** Mingo

**Job Title:** Teacher

**Key Topic:** Other

**Sub Topic:**

**Attachment:** N

**Comment:** I've clicked on 5 web pages from your site and still cannot find 1 page that has the recommended number of ounces for intake in each category. Please simplify it one stop shop

**Comment ID:** 000224

**Submission Date:** 01/23/2009

**Organization Type:** Industry Association

**Organization Name:** National Cattlemen's Beef Association

**First Name:** Kristina

**Last Name:** Butts

**Job Title:** Manager Legislative Affairs

**Key Topic:** Eating Patterns, Food Groups, Food Safety, Minerals, Other, Protein, Vitamins

**Sub Topic:** Iron, Meat, Beans, Eggs, Fish, and Nuts, Zinc

**Attachment:** Y

**Comment:** The Beef Checkoff through the National Cattlemen's Beef Association appreciates the opportunity to provide comments to the 2010 Dietary Guidelines Advisory Committee on the development of the seventh edition of the Dietary Guidelines for Americans. NCBA, which is producer-driven and consumer-focused, is the trade association of America's cattle farmers and ranchers, and the marketing organization for the largest segment of the nation's food and fiber industry. NCBA recognizes the critical role the Dietary Guidelines for Americans plays in forming the basis of federal food policies and nutrition education activities. We commend the efforts undertaken by the Department of Agriculture, the Department of Health and Human Services and members of the DGAC to evaluate and update the current Guidelines.

The main purpose of the Dietary Guidelines for Americans remains relevant today: represent science-based advice to promote public health and reduce risk for chronic diseases through food choices and physical activity. Within the attached comments, we are providing information in three primary areas for the DGAC's consideration:

The Beef Industry has committed numerous resources to help improve the nutritional health of Americans and ensure beef can play a role in a healthy lifestyle. We have responded to consumer demand and public health recommendations to help Americans decrease fat intake by providing leaner cuts of beef. Today, at least 29 cuts of beef meet government guidelines for the definition of lean. Most importantly, these lean cuts of beef are some of the most popular in the diets of Americans.

# Comments Summary Report

Submission Date Between 10/29/2008 and 01/23/2009

Key Topic: Other

Beef's bundle of nutrients is beneficial for growing, developing and maintaining overall health through all life's stages. With only 154 calories, one 3-ounce serving of lean beef contributes less than 10 percent of the calories, in a 2,000-calorie diet

**Comment ID:** 000220

**Submission Date:** 01/23/2009

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** American Heart Association

**First Name:**

**Last Name:**

**Job Title:**

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

**Sub Topic:** Added sugars, 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 attachment

**Comment ID:** 000056

**Submission Date:** 11/06/2008

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** National Dairy Council

**First Name:** Gregory

**Last Name:** Miller

**Job Title:** Executive Vice President, Research, Regulatory and Scientific Affairs

**Key Topic:** Eating Patterns, Energy Balance/Physical Activity, Fats, Food Groups, Minerals, Other

**Sub Topic:** Calcium, DASH, Magnesium, Milk, MyPyramid, Potassium

**Attachment:** Y

**Comment:** At time when the American population is overweight and undernourished, it is more important than ever to help consumers get more nutrition out of the food and beverages they consume. As the Dietary Guidelines Advisory Committee begins its work of drafting new guidelines for Americans, the NDC applauds the leadership of the Departments of Agriculture and Health and Human Services for their crucial efforts to help Americans live healthier lives and reduce the risk of chronic disease.

# Comments Summary Report

*Submission Date Between 10/29/2008 and 01/23/2009*

**Key Topic: Other**

**Comment ID:** 000205

**Submission Date:** 01/23/2009

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** The Vegetarian Resource Group

**First Name:** Reed

**Last Name:** Mangels, PhD, RD

**Job Title:** Nutrition Advisor

**Key Topic:** Eating Patterns, Food Groups, Minerals, Other

**Sub Topic:** Calcium, Fruits, Grains, Whole grains, Iron, Meat, Beans, Eggs, Fish, and Nuts, Milk, MyPyramid, Vegetables

**Attachment:** Y

**Comment:** We appreciate the opportunity to share our ideas for the 2010 Dietary Guidelines for Americans. As advocates for people who choose to follow a vegetarian diet, we believe that the Dietary Guidelines should include information about vegetarian diets. This has been done somewhat in the past with suggestions for alternatives to meat products but information is limited. We also recommend increasing the emphasis on plant-based diets for all Americans.

**Comment ID:** 000217

**Submission Date:** 01/23/2009

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** Prevention Institute

**First Name:** Juliet

**Last Name:** Sims

**Job Title:** Program Coordinator

**Key Topic:** Food Safety, Other

**Sub Topic:**

**Attachment:** Y

**Comment:** Please see attached letter.

# Comments Summary Report

Submission Date Between 10/29/2008 and 01/23/2009

Key Topic: Other

**Comment ID:** 000138

**Submission Date:** 01/16/2009

**Organization Type:** Other

**Organization Name:**

**First Name:** Jake

**Last Name:** Normand

**Job Title:**

**Key Topic:** Carbohydrates, Other

**Sub Topic:** Added sugars

**Attachment:** N

**Comment:** I believe the '05 guidelines are generally adequate to ensure the proper health of Americans as a whole. My primary concern, however, is that 'junk foods' are not discouraged. For example, Americans are overwhelmed with processed foods that include high fructose corn syrup and refined sugar at supermarkets, convenience stores, public events, etc. It is my opinion that the USDA should discourage consumption of foods containing these, and other substances that are known to be detrimental. Lets face it, some foods have zero nutritional value other than cell fuel. To simply encourage the consumption of healthy food is NOT enough; we are what we eat, please discourage junk food. For suggestion, a color or 1-10 numbering system could be assigned to foods to indicate the relative nutrition/calorie/fat content. As an example, worthless food like regular soda would be red or 0; while carrots would be green or 10, etc.

**Comment ID:** 000139

**Submission Date:** 01/16/2009

**Organization Type:** Other

**Organization Name:**

**First Name:** Janis

**Last Name:** Lindenberger

**Job Title:**

**Key Topic:** Eating Patterns, Energy Balance/Physical Activity, Food Groups, Food Safety, Other

**Sub Topic:** Fruits, Grains, Whole grains, Other, Vegetables

**Attachment:** Y

**Comment:** Plant based diet for both health and the environment.

# Comments Summary Report

*Submission Date Between 10/29/2008 and 01/23/2009*

**Key Topic: Other**

**Comment ID:** 000152

**Submission Date:** 01/19/2009

**Organization Type:** Other

**Organization Name:**

**First Name:** Daniel

**Last Name:** Hamilton

**Job Title:** Senior Planner

**Key Topic:** Eating Patterns, Other

**Sub Topic:**

**Attachment:** N

**Comment:** I believe the dietary guidelines must go beyond an overly-simplistic model of carbohydrates, fats, and proteins. The system should be based on overall healthy eating practices, which relate far more to calorie intake, removal of processed foods to the greatest extent possible, and a focus on balance of nutrients rather than food types. I recommend inclusion of and focus on natural foods, meaning those foods that occur in nature, and a statement about the likely negative impacts of processed foods, artificial preservatives and fillers, and GMO foods.

**Comment ID:** 000108

**Submission Date:** 01/04/2009

**Organization Type:** Other

**Organization Name:**

**First Name:** Donald

**Last Name:** Prince

**Job Title:**

**Key Topic:** Eating Patterns, Other

**Sub Topic:**

**Attachment:** N

**Comment:** Diabetes - Type 2. This country has millions of people with diabetes (know & unknown). Your food type and amount are a major method of managing this condition. You should consider making this part of your material.

# Comments Summary Report

Submission Date Between 10/29/2008 and 01/23/2009

Key Topic: Other

**Comment ID:** 000079

**Submission Date:** 11/20/2008

**Organization Type:** Other

**Organization Name:**

**First Name:** Constance

**Last Name:** Brown

**Job Title:**

**Key Topic:** Evidence-based Review Process, Nutrient Density/Discretionary Calc, Other

**Sub Topic:**

**Attachment:** N

**Comment:** The Guidelines need to be validated or tested. They are mandated to feed our school children, military, and prisoners - that is 50 million people, who already have a too-high proportion of obesity.

There is evidence now that the Pyramid guidelines are contributing to making Americans overweight.

How do we know the Guidelines do not cause harm?

I am referring to the premise of Paul Marantz, Clinical Epidemiology and Population Health at the Albert Einstein College of Medicine in New York City:

"...the standards that had been applied to determining and promulgating dietary guidelines for all Americans have been insufficient to protect against the possibility of harm and in fact our analysis suggest that there indeed may be harm that can be an outcome of these guidelines. And once that's considered, the issue of standards of evidence becomes much more pressing."

I am further referring to the research showing the Pyramid making us fat:

"However, without discretionary calorie restriction, Americans are at risk of having excessive energy intake even if they follow the 2005 FGP food serving recommendations."

(THE 2005 USDA FOOD GUIDE PYRAMID IS ASSOCIATED WITH MORE ADEQUATE NUTRIENT INTAKES WITHIN ENERGY CONSTRAINTS THAN THE 1992 PYRAMID

Authors

Gao, Xiang - HARVARD SCH PUB HEALTH )

If the Guidelines are simply a lobby effort that is okay but in that case, let's be open about what poor science the Guidelines are.

Does the USDA, and the administration, think that Americans don't notice that the Guidelines over- promote grains, sweet, and vegetable oil, and that hm, we are getting fatter?

# Comments Summary Report

Submission Date Between 10/29/2008 and 01/23/2009

Key Topic: Other

**Comment ID:** 000201

**Submission Date:** 01/23/2009

**Organization Type:** Other

**Organization Name:**

**First Name:** Susan

**Last Name:** Prolman

**Job Title:**

**Key Topic:** Fats, Food Groups, Minerals, Other, Protein, Vitamins

**Sub Topic:** Cholesterol

**Attachment:** N

**Comment:** In this time, when a growing number of Americans struggle with obesity and other diet related ailments, it is important for the US government to take the lead in urging citizens and residents to consume a healthful, nutritious plant based diet. Vegan diets provide copious quantities of antioxidants, vitamins, minerals, protein, and fiber without cholesterol. Vegans and vegetarians have been shown to be slimmer and more healthful than their omnivorous counterparts. Those who continue to consume animal products should be encouraged to reduce these. Thomas Jefferson famously said that he consumed meat only "as a condiment to the vegetables which constitute my principal diet." There are other reasons for the government to promote a plant based diet. One is environment: the production of animal products contributes to global warming, pollutes our air, soil, and water, and harms wildlife. Germany's Federal Environmental Agency has asked German citizens and residents to reduce consumption of animal products, and the US government should do the same.

The US government should also take this opportunity to improve the way animal products are produced. It should support sustainable production, while strictly regulating mammoth concentrated animal feeding operations. It should end the use of antimicrobials in animal agriculture to the degree that this use may harm the public health. It should ensure that CAFOs are no longer allowed to externalize their costs - including the costs of concentrating huge quantities of manure and other animal waste into a small area - onto taxpayers, rural communities, and the public at large.

Finally, the federal government should establish meaningful farm animal welfare standards that outlaw battery cages, gestation and farrowing crates, and veal crates. As the landslide victory of Prop 2 in California showed, Americans are deeply offended by the wanton cruelty that is the norm in industrial animal agriculture.



# Comments Summary Report

*Submission Date Between 10/29/2008 and 01/23/2009*

**Key Topic: Other**

**Comment ID:** 000065

**Submission Date:** 11/10/2008

**Organization Type:** Other

**Organization Name:** Marion High School

**First Name:** Felicia

**Last Name:** Hamberg

**Job Title:** Student

**Key Topic:** Other

**Sub Topic:**

**Attachment:** N

**Comment:** I and others would love if our schools provided another option for vegetarians and vegans. We have so much trouble because at my school all they really serve is meat and some unhealthy things. Thanks you.

**Comment ID:** 000102

**Submission Date:** 12/23/2008

**Organization Type:** Other

**Organization Name:** Canyon Ranch

**First Name:** Lori

**Last Name:** Reamer

**Job Title:** Director of Nutrition

**Key Topic:** Other

**Sub Topic:**

**Attachment:** N

**Comment:** I am hopeful that discussions of the 2010 guidelines include some insertion of connecting to your food and food experience. As we know, Americans associate food with guilt and are often at odds with what they eat and their body weight. Many authors, including Michael Pollan stress the concept that if we connect to our food experience we will be more satisfied and not keep seeking satisfaction via excessive portions, eating quickly, etc. Note that other countries dietary guidelines that tend to have lower overall rates of disease than the US include some element of deriving pleasure from food, connecting to food, enjoying food.

# Comments Summary Report

*Submission Date Between 10/29/2008 and 01/23/2009*

**Key Topic: Other**

**Comment ID:** 000120

**Submission Date:** 01/09/2009

**Organization Type:** Professional Association

**Organization Name:** American Society for Nutrition

**First Name:** Mary Lee

**Last Name:** Watts

**Job Title:** Director of Science and Public Affairs

**Key Topic:** Eating Patterns, Energy Balance/Physical Activity, Evidence-based Review Process, Other

**Sub Topic:**

**Attachment:** Y

**Comment:** The American Society for Nutrition (ASN) appreciates this opportunity to submit the attached comments to the 2010 Dietary Guidelines Advisory Committee. With a membership of more than 3500 scientists, ASN is the premier research society dedicated to improving the quality of life through the science of nutrition. We are proud of our members who are currently serving on the Dietary Guidelines Committee and those who have served on past Committees.

**Comment ID:** 000097

**Submission Date:** 12/19/2008

**Organization Type:** State/Local Government Agency

**Organization Name:**

**First Name:** Rachel

**Last Name:** Findley, RD, LDN

**Job Title:** Child Nutrition Supervisor

**Key Topic:** Energy Balance/Physical Activity, Other

**Sub Topic:**

**Attachment:** N

**Comment:** I believe we need more direction as to the caloric requirements for children. Since more children are becoming increasingly sedentary for a variety of reasons, the current caloric requirements/servings per food group needs to reflect our children of today. In addition, since the nutrition requirements of the National School Lunch Program are guided by the Dietary Guidelines for Americans, we as child nutrition professionals need that guidance to provide more nutritious foods to our students.