Comments Summary Report
Submission Date Between 10/29/2008 and 01/23/2009
Key Topic: Protein

**Comment ID: 000197**
Submission Date: 01/22/2009
Organization Type: Educational Institution
Organization Name: Triton College
First Name: Gabriel
Last Name: Guzman
Job Title: Professor of Microbiology
Key Topic: Carbohydrates, Energy Balance/Physical Activity, Fats, Food Groups, Protein
Sub Topic: Low carbohydrate, Meat, Beans, Eggs, Fish, and Nuts, Milk, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids, Vegetables
Attachment: Y
Comment: When true carbohydrate restriction/controlled is adopted, the amount of protein is usually increased, not the amount of fat. A true carbohydrate controlled diet reduces the amount of effective carbohydrate while ensuring the adequate intake of protein (based on individual size and level of physical activity) and does not encourage the increase in fat intake as a necessity. Instead, with respect to fat intake, a true and well structured low-, restricted- or controlled carbohydrate diet emphasizes the quality of fat and the avoidance of artificial trans-fats. The science that reportedly shows that saturated fat is detrimental has not taken into account other components in the diets used in the studies, does not provide convincing evidence of the adverse effects of saturated fats per se. The evidence that shows the benefits of a moderate fat intake (including saturated fat) does not support the ban on saturated fats or the limitation to a very small amount in the diet. Dietary Guidelines based on carbohydrate restriction/control will achieve the same objectives as the current GDA2005: eat fewer calories without necessarily and forcefully decreasing food intake but by taking advantage of the dynamic action of a higher protein intake, being more active and making wiser food choices, choices based not on fat content but on effective carbohydrate content instead.

**Comment ID: 000095**
Submission Date: 12/18/2008
Organization Type: Educational Institution
Organization Name: UCSF
First Name: Trudy
Last Name: Theiss
Job Title: perinatal dietitian/CDE
Key Topic: Eating Patterns, Protein
Sub Topic: MyPyramid
Attachment: N
Comment: When recommending protein source amounts...
It is important that each choice for a serving of protein has approximately 7 grams of protein. Please note that the Calories for each serving of vegetarian protein (equal to 7 g protein) can vary with the protein type. The focus should be on the grams of protein per serving and not on Calories per serving. Of course one can always recommend the lower Calorie choices if there is a problem with excessive weight gain or overweight. Protein content of the diet should not be sacrificed just because a women is overweight or because the woman is eating too many extra non-protein source Calories. It is best to strive for 71 grams of protein/day by mid pregnancy.
This was the problem I had about the current MyPyramid chart. The protein serving sizes that are identified for nuts, etc., do not contain 7 grams of protein. We cannot simply assume that most people get too much protein.

| Comment ID: | 000110 |
| Submission Date: | 01/05/2009 |
| Organization Type: | Individual/Professional |
| Organization Name: | Mitchell |
| First Name: | R L |
| Last Name: | Mitchell |
| Job Title: | |
| Sub Topic: | Added sugars, Cholesterol, Fiber, Fruits, Glycemic index, Grains, Whole grains, Low carbohydrate, Meat, Beans, Eggs, Fish, and Nuts, MyPyramid, Oils, Unsaturated fatty acids, Vegetables, Whole grains |
| Attachment: | N |
| Comment: | I ate whole wheat bread, brown rice, beans and low fat products for years, it didn't do anything but make me hungry, tired and diabetic. Seriously, when I started restricting sugars and starches my appetite was cut in half and after the first week or so I felt like I suddenly woke up after being asleep for years. The scientific evidence is out there but you will never hear it on the nightly news, even the abstracts of the studies you hear about are carefully slanted to reflect current dogma no matter what the real results were. We don't need loads of carbohydrates and there is no real evidence for the saturated fat - cholesterol - heart disease theory. Quit eating stuff that comes in a box and start eating food that doesn't come with a nutrition panel and you will feel tons better. There are plenty of micro nutrients and fiber in non starchy vegetables, low sugar fruits, nuts and seeds and even more vitamins and minerals in animal products like meat and eggs, you really don't need bread, pasta, rice or potatoes and you surely don't need sugar added to everything in the store.

It's time we demanded representation on the panel that sets nutrition policy for this country and first degree scientific evidence for a food policy imposed on so many people who don't have a choice. Kids are coming home from school hungry because their school lunches are starch and sugar heavy and low in calories, protein and fat because lunch programs are required to follow the mypyramid policy. Let's get the grains, sugars, and artificial (chemically extracted) vegetable oils out of our diets and start eating real food again. Let us at least acknowledge that the USDA is here to promote the health of the giant agricultural conglomerates not US citizens and stop listening to the large medical and health organizations that are compromising our health by recommending diets that follow USDA policy.
| 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. |

| 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. |
The current USDA food pyramid has grains at the bottom indicating that the USDA believes that this food group is the most important of all. It indicates that we should derive the largest majority of our calories from this food group.

However, human beings do not need grains to survive healthfully. In fact, there is not a single micronutrient in grains that is not found as plentifully in meats, vegetables and fruits.

Why then is the USDA pyramid constructed in its current configuration? Should not the bottom of the pyramid be what human beings need most of to survive healthfully? Obviously this is so.

Water should be at the bottom. As for food, the question is begged - what is the most nutrient dense of all the food groups? Put another way, what food group would keep a human being alive the longest if no other food group was available? The answer is meat, fish, eggs and other protein/fat sources. This food group should be at the bottom of the pyramid above water. On top of meats, vegetables, nuts and seeds, then fruits. Every other food group is an option, in other words, we as humans do not need or require cheese, dairy or sweets to survive.

The food pyramid should be scientifically constructed not slapped together to satisfy the interests of certain organizations.
Comments Summary Report
Submission Date Between 10/29/2008 and 01/23/2009
Key Topic: Protein

Comment ID: 000107
Submission Date: 01/04/2009
Organization Type: Individual/Professional
Organization Name:
First Name: Linda J
Last Name: Morgan, MD
Job Title: Physician
Key Topic: Carbohydrates, Eating Patterns, Fats, Minerals, Nutrient Density/Discretionary Calc, Protein, Vitamins
Sub Topic: Added sugars, B Vitamins, Calcium, Cholesterol, Fiber, Fish oil, Omega 3 fatty acids, Folate, Glycemic index, Magnesium, Oils, Unsaturated fatty acids, Other, Potassium, Trans fatty acids, Vitamin A and Carotenoids, Vitamin C, Vitamin D, Vitamin E, Whole grains, Zinc
Attachment: N
Comment: I have worked in the medical field for 18 years. Through my reading of the studies done, I see that the problem with the health of our population is the oxidative stress that our bodies are undergoing without sufficient antioxidant systems, supplements, and intake in place to counter that stress. The population, starting in infancy needs to stay away from concentrated carbs, move towards complex carbs, help support the beneficial bacteria in our gut, and increase the antioxidant content of our diet through a more balanced approach of eating complex carbs (fruits, veggies, grains, legumes, nuts and seeds - yes they have complex carbs, too), good and beneficial fats, and high quality protein - animal and vegetable based. Good and beneficial fats are those found in nature. We have become a nation that is eating "FAKE" food and it is showing up in our health. I have read so many articles and books by different experts on our health and it seems that no one book, article can pull it all together. Everyone claims this or that is the only cause of what ails us, and I believe we owe it to the public to tell them the truth. High carb, low fat is NOT the way to go. Balance is the key and increasing our body's reserve of anti-oxidants to counter the oxidative stress that we are all experiencing in this polluted, chemicalized world. Feeding hormones to animals, spraying crops with chemicals because their own defense system (those antioxidant co factors and minerals) are missing. I own the second oldest farm west of the Mississippi River and we have never resorted to giving our cattle unnecessary antibiotics and never have given them hormones. Why do you think our nation of young women are starting through puberty so early? They are exposed to too many xenoestrogens through our food supply. I have run an indigent clinic in a homeless shelter, worked in an ER dealing with the aftermath of a lifetime of oxidative stress and poor nutrition, and now I'm teaching prevention.

Comment ID: 000078
Submission Date: 11/20/2008
Organization Type: Individual/Professional
Organization Name:
First Name: Cynthia
Last Name: Moore
Job Title: 
Key Topic: Carbohydrates, Energy Balance/Physical Activity, Fats, Food Groups, Protein, Vitamins
Sub Topic: Added sugars, Fish oil, Omega 3 fatty acids, Low carbohydrate, Meat, Beans, Eggs, Fish, and Nuts, Vitamin A and Carotenoids, Vitamin D, Weight maintenance
Attachment: Y
Comment: It is my opinion that the current nutritional guidelines are designed to maximize the benefit to big agricultural interests and not to benefit human health. I have first hand
experience of how cutting carbohydrates in general and fructose in particular from my family's diet has reduced fat stores, abdominal obesity, triglyceride levels, blood glucose levels, and in general greatly improved our health. There are also many controlled clinical trials that now support the hypothesis of carbohydrate intolerance and its role in the obesity and diabetes epidemic. The nutritional guidelines in their current form mandate overfeeding of carbohydrates and unhealthy fats to children in schools, and all others subject to federal compliance. If you really care about the health of Americans, you will take the evidence from clinical trials showing improvements in all measures of health from reducing the proportion of carbohydrates and increasing the proportion of meats, eggs, and vegetables in the diet. The result will improve life and reduce health care costs enormously. The only people who can eat a high carbohydrate diet without weight gain are those who exercise a great deal, with few exceptions, but even in serious athletes, triglycerides and blood lipid profiles are compromised by such a diet. Please consider the recent studies examining the commonly accepted beliefs about the safety of carbohydrate overfeeding before promulgating guidelines that will only hurt our people more.

Comment ID: 000144
Submission Date: 01/17/2009
Organization Type: Individual/Professional
Organization Name: Lindsey
First Name: Lindsey
Last Name: 
Job Title: 
Key Topic: Eating Patterns, Fats, Food Groups, Protein
Sub Topic: 
Attachment: N
Comment: It seems time to see a healthy shift from the current focus on consuming animal products for their reputed health benefits to incorporating more whole, organic plant based sources of proteins and fats as the main dietary intake.

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.

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<td>Eating Patterns, Protein</td>
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<td>Attachment:</td>
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<td>Comment:</td>
<td>I think more focus should be on informing people that they can get all the protein they need from a plant based diet. Given the information on diabetes, obesity and heart health - encouraging people to eat more vegetables and fruits and opt for a plant based vegan diet would be beneficial.</td>
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<td>First Name:</td>
<td>Douglas</td>
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<td>Last Name:</td>
<td>Paddon-Jones</td>
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<td>Job Title:</td>
<td>Scientist</td>
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<td>Key Topic:</td>
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<td>Attachment:</td>
<td>Y</td>
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<td>Comment:</td>
<td>There is increasing evidence that many individuals, including older adults, athletes and those experiencing illness or injury require more protein than specified by the current RDA. While many consume far more than the RDA for protein, many others, including our more vulnerable populations, do not meet the current recommendations. In both instances, guidance on moderation, distribution and frequency of protein ingestion is lacking. A recommendation calling for ingestion of a moderate amount (20-30 g) of high quality protein with each meal is consistent with the Institute of Medicine's Acceptable Macronutrient Distribution Range (AMDR: 10-35%) and has been linked to a host of positive health outcomes.</td>
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### Comments Summary Report

**Submission Date Between 10/29/2008 and 01/23/2009**  
**Key Topic: Protein**

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<tr>
<td>000189</td>
<td>01/22/2009</td>
<td>Industry Association</td>
<td>National Pork Board</td>
<td>Ceci</td>
<td>Snyder</td>
<td></td>
<td>Eating Patterns, Evidence-based Review Process, Fats, Food Groups, Minerals, Nutrient Density/Discretionary Calc, Protein, Vitamins</td>
<td>Iron, Meat, Beans, Eggs, Fish, and Nuts, MyPyramid, Oils, Unsaturated fatty acids, Potassium, Saturated fatty acids, Zinc</td>
<td>Y</td>
<td>The National Pork Board urges the 2010 Dietary Guidelines Advisory Committee to uphold current recommendations for the meat and beans group based on the published science and to focus on the benefits of choosing a variety of nutrient-rich foods within and among the basic food groups. Americans will enjoy better health through more frequent selection of naturally nutrient-rich foods.</td>
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<tr>
<td>000224</td>
<td>01/23/2009</td>
<td>Industry Association</td>
<td>National Cattlemen's Beef Association</td>
<td>Kristina</td>
<td>Butts</td>
<td>Manager Legislative Affairs</td>
<td>Eating Patterns, Food Groups, Food Safety, Minerals, Other, Protein, Vitamins</td>
<td>Iron, Meat, Beans, Eggs, Fish, and Nuts, Zinc</td>
<td>Y</td>
<td>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</td>
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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.

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:** 000204

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

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** Metabolism Society

**First Name:** Laurie

**Last Name:** Cagnassola

**Job Title:** Director

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

**Sub Topic:** Added sugars, Fruits, Grains, Whole grains, Low carbohydrate, Meat, Beans, Eggs, Fish, and Nuts

**Attachment:** Y

**Comment:** Updated to 79 Comments from the public concerning revising the dietary guidelines for 2010 - see attached. Thank you for this opportunity.
### Comment ID: 000212

**Submission Date:** 01/23/2009  
**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, Food Groups, Minerals, Nutrient Density/Discretionary Calc, Protein, Vitamins  
**Sub Topic:** B Vitamins, Calcium, DASH, Folate, Magnesium, Milk, MyPyramid, Potassium, Sodium, Vitamin A and Carotenoids, Vitamin D, Weight maintenance, Zinc  
**Attachment:** Y  
**Comment:** The role of milk products and overall nutrient adequacy.  
Assessing the optimal number of dairy servings for Americans.  
Impact of milk products on chronic disease risk.

### Comment ID: 000209

**Submission Date:** 01/23/2009  
**Organization Type:** Nonprofit/Voluntary  
**Organization Name:** Oldways Preservation & Exchange Trust  
**First Name:** Nicki  
**Last Name:** Heverling  
**Job Title:** Registered Dietitian & Mediterranean Foods Alliance Program Manager  
**Key Topic:** Eating Patterns, Fats, Food Groups, Protein  
**Sub Topic:** Meat, Beans, Eggs, Fish, and Nuts, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids  
**Attachment:** Y  
**Comment:** As the 2010 Dietary Guidelines Committee convenes for its second meeting, we urge Advisory Committee members to incorporate the nutrition principles of the Mediterranean Diet into the upcoming guidelines:  
1) Choose a combination of plant-based foods at every meal: Grains (mostly whole), fruit, vegetables, beans, nuts, seeds, legumes, healthy fats, and herbs and spices;  
2) Eat fish (as a vehicle for long-chain fatty acid intake) at least twice a week;  
3) Include eggs, dairy, and poultry, if these foods fit in to an individual’s food preferences and lifestyle, on a daily to weekly basis; and  
4) Enjoy sweets and meats less often and in smaller amounts.
I hope you will consider looking at the considerable amount of research that shows the health benefits of eating an animal protein based high-fat, low-carbohydrate diet, particularly in preventing or treating obesity, heart disease, and high cholesterol. Also, if you could just completely condemn the usage of trans-fat as harmful, because it is!

I am calling for the USDA to put far more emphasis on a plant-based diet in it's recommendations for what people need to eat. We Americans are far too fat. We eat too much meat and processed foods. People who eat a plant-based diet are leaner, with less problems with cholesterol and heart health issues. It is time we got away from our meat laden, high fat diets. These are killing us.
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.