



November 28, 2017

Acting Deputy Under Secretary Brandon Lipps
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Re: 2020 Dietary Guidelines for Americans Listening Session

Dear Acting Deputy Under Secretary Brandon Lipps,

1,000 Days is commenting on the recent reports of the Health and Medical Division (HMD) of the National Academies of Science, Medicine and Engineering and on the process for establishing the 2020 Dietary Guidelines for Americans (DGAs). We thank you for this opportunity to comment and for your efforts to ensure that this process is transparent, data-driven and science based.

1,000 Days is the leading organization working in the U.S. and around the world to improve nutrition for mothers and children during the critical 1,000 day window from a woman's pregnancy through her child's 2nd birthday. During this time, how well or how poorly a child is nourished has a profound impact on her ability to grow, learn and thrive. A growing body of scientific research shows that good nutrition early in life provides the essential building blocks for brain development, healthy growth and a strong immune system. Poor nutrition, on the other hand, can predispose children to obesity, heart disease, diabetes, and other diseases as well as cognitive and behavioral problems — the effects of which can be felt at a societal level, from a less competitive workforce to higher healthcare costs and greater inequality of opportunity.

1,000 Days' analysis of the state of early nutrition in the U.S.¹ shows that far too many young children and their families are not getting the nutrition they need to thrive. One in 5 babies in the U.S. is never breastfed and 1 in 4 children ages 1 to 2 do not receive the recommended dietary allowance for iron—one of the most important brain-building nutrients. Further, over half of toddlers and preschoolers have one or more sugar-sweetened beverages per day, contributing to our nation's high rates of childhood obesity.

It is within this context that the Dietary Guidelines are more critical now than ever, as they will, for the first time, include recommendations for pregnant women and very young children. The 2020 DGAs and the recommendations for pregnant women and young children will inform federal nutrition programs that reach young children and their families, as well as serve as an important reference point for physicians, nutrition counselors, and early childcare providers among others. Moreover, the new guidance will also provide parents and caregivers with the

¹ 1,000 Days. *The First 1,000 Days: Nourishing America's Future*. September 2016



evidence-based information they need to give their children the best chance to lead healthy, prosperous lives free of preventable chronic disease.

Given the inclusion of this new population – specifically pregnant women and children 0-2 years of age – 1,000 Days makes the following recommendations:

Recommendation 1: Ensure that at least half of the members of the Dietary Guidelines Advisory Committee (DGAC) have expertise in issues related to the unique nutritional needs of pregnant women, infants and young children.

The DGAC should be comprised of members with a range of expertise and experience in the fields of food, health, and nutrition. However, the inclusion of pregnant women and children under the age of two in the upcoming DGAs necessitates that the committee members have expertise specific to the needs of these populations. Pregnant women and infants have specific nutritional needs that are different from those of the general population. These needs are important to address because we know that good nutrition in the period from pregnancy through a child's second birthday sets the foundation for a child's development and lifelong health and well-being.

Dietary guidelines play a significant role in informing how Americans think about nutrition and in shaping our food habits. With pervasive misinformation about nutrition and diet in the media, the dietary guidelines are more important than ever in establishing credible and widely disseminated recommendations. The first-ever dietary guidelines for pregnant women and children under the age of two (P/B-24) will thus play a critical role in informing providers, practitioners, and the public about the nutrition that moms and babies need to thrive. While the HMD Report calls for at least one DGAC member to have expertise specific to the P/B-24 window, given its importance, we recommend that **at least half** of the members of the DGAC have this expertise in order to accurately and comprehensively address the specific nutritional needs of these populations.

Recommendation 2: Ensure that the process to establish the 2020 DGAs – including the Dietary Guidelines Advisory Committee selection process – is transparent and free of bias or conflict of interest.

1,000 Days recommends that USDA and HHS eliminate the potential for corporate interests to interfere with the process of creating sound, science-based guidance. In particular, we urge that no individuals representing companies that manufacture or market formula or sugar sweetened beverages, or who have relationships with such companies, should be a part of the DGAC.

The process to establish the DGAs – and the DGAC selection process in particular – should also prioritize transparency. 1,000 Days suggests that all preliminary DGAC nominations should be available online with all scientific, institutional and funding affiliations listed. We also urge USDA and HHS to provide the public with a description of the selection process. Once the DGAC members are selected, members should be listed publicly along with their background, qualifications, and past employment.



1,000 Days understands that the suggestion in the HMD report to employ a third party to review nominations for DGAC candidates is an attempt to reduce political bias. However, we are concerned that the third party would introduce new biases into the process, especially if the third party were a for-profit or private organization. If this step is introduced, we recommend that the third party be a government organization.

Recommendation 3: Ensure that the DGAC members have an understanding of and appreciation for the scientific evidence that shows the health and developmental benefits of breastmilk and the importance of limiting added sugar intake for adults and eliminating added sugar intake for children under age 2.

The DGAC should include a range of expertise, including a focus on infants, toddlers and pregnant women. However, a range of expertise does not necessitate a range of opinions on matters of scientific consensus.

The HMD reports do not offer a detailed recommendation for the criteria for selecting the DGAC members. However, 1,000 Days urges USDA and HHS to create criteria that would ensure that the DGAC contains experts who understand and appreciate the scientific consensus around breastfeeding and added sugars. The American Academy of Pediatrics recommends that babies are only fed breastmilk for the first 6 months. Yet almost 20% of babies in the United States are *never* breastfed. With respect to sugar, the American Heart Association recommends that children under age 2 should not consume any foods or beverages with added sugars. Yet, more than half of toddlers and preschoolers consume one or more sugar-sweetened beverages per day. These are critical issues that need evidence-based and credible expertise.

It is for the above reasons that 1,000 Days also recommends a special focus to ensure that the DGAC contains no representatives of companies that sell infant formula or sugar-sweetened beverages such as soda; and no individuals with relationships to such companies that might pose a conflict of interest.

Thank you for this opportunity to comment on the process to create the DGAs. We appreciate the effort that is being taken to increase transparency and solicit external feedback and we look forward to continuing to be engaged as the process continues.

Sincerely,

Adrianna Logalbo
Managing Director
1,000 Days