



November 28, 2017

Brandon Lipps
Acting Deputy Under Secretary
Food, Nutrition, and Consumer Services
U.S. Department of Agriculture
3101 Park Center Drive, Room 906
Alexandria, VA 22302

**Re: The U.S. Department of Agriculture Listening Session on the 2020
*Dietary Guidelines for Americans***

Dear Mr. Lipps:

The American Frozen Food Institute (AFFI), on behalf of its member companies thanks the Center for Nutrition Policy and Promotion (CNPP) for the opportunity to comment on *the Dietary Guidelines for Americans* (DGA) process. AFFI is the voice of the frozen food industry, and is the national trade association that advances the interests of all segments of the frozen food and beverage industry, including frozen food manufacturers and distributors throughout the United States and globally.

First, AFFI commends the U.S. Department of Agriculture (USDA) and the U.S. Department of Health and Human Services (HHS) for their efforts in developing a science-based dietary guidance document. Because the DGA has evolved to have such a broad reach and impacts important nutrition policies, AFFI appreciates that attention is being given to how the DGA is researched and developed. The DGA influences many diverse individuals with varying lifestyles, food preferences, food access, beliefs and traditions. It is imperative that the DGA communicates the equally diverse and many ways to achieve healthfulness that includes all kinds and forms of food to the American people, policy makers, industry, and health professionals. The right research questions need to be asked, the right experts need to be selected to answer them, and the right amount of time must be allotted to the process to accomplish this. Additionally, it is important that transparency is maintained throughout the committee selection process for the DGA.

The fluidity of the Dietary Guidelines Advisory Committee's (DGAC) scope of work has led to the committee answering a variety of research questions that are decided by the experts themselves. These research questions generate the priorities of the policy document, the research selected, and the eventual messages that will impact a range of nutrition policies. Indeed, the DGA scope has evolved over time as it once only provided nutrition guidance to the general public, then expanded to include obesity-specific guidance, and most recently further expanded to include information related to chronic diseases and nearly included issues of sustainability. Research questions, and therefore the scope of the DGA, should be developed before the experts are

selected. We appreciate USDA and HHS's priority to make the DGAC's process as transparent as possible, and recommend that the same attention be applied to how the research questions are generated as they are the foundation of the policy document.

Based on the research questions and decided scope, experts comprising the DGAC can be selected. Because the DGA affects federal nutrition programs, industry, consumers and health professionals, a balanced committee is required to answer these research questions. In the past, no food scientists or experts in food manufacturing and production have been staffed on the committee, however industry involvement is critical in creating sustainable and meaningful changes in the food environment of the United States. Choosing experts that are best suited to answer the chosen research questions ensure that the recommendations in the guidance document have been supported by individuals with the highest familiarity with appropriate research methodology, literature and downstream applications of the recommendations. In the pursuit of transparency, the protocol for how the research questions are developed, how the DGAC is chosen and the potential for public comment on both, are worthy of USDA, HHS and the National Academies of Science, Engineering, and Medicine (NASEM).

The scientific rigor of the DGA will be further strengthened with the combination of the appropriate selection of experts and literature. The systemic reviews in the Nutrition Evidence Library (NEL) have transparent, rigorous and pre-defined methodology and should be used to generate the recommendations in the DGA. Pre-existing systemic reviews have inclusion and exclusion criteria that may be less rigorous and may be formulated to answer the author's research questions, not the DGAC's research questions. Additionally, the decision to use pre-existing reviews and not others is subjective. The use of the NEL should be examined as well as the types of data used to substantiate recommendations.

Continuously monitoring and evaluating the effects of any large public health initiative is best practice and should be employed in the DGA process. Currently, there is no available outcome data specific to the DGA that can illuminate how the DGA is affecting public health. There are still gaps in how to adopt the dietary advice and translate these recommendations into realistic, long term behavior changes. Outcome data on the effectiveness of the DGA is imperative for future reforms that will increase the understandability and acceptability of the messages in the DGA and better bridge the gap between nutrition recommendations and behavior changes.

For example, AFFI is passionate about increasing America's fruit and vegetable consumption. The Produce for Better Health Foundation (PBH) in their 2016 report on primary shoppers' attitudes and beliefs related to fruit and vegetable consumption found that despite the health benefits of eating more fruits and vegetables, primary shoppers found nearly all forms of vegetables to be healthier than fruit. Primary shoppers also reported eating too few fruits and vegetables. PBH research also reveals that those who eat the most fruits and vegetables report having more of all forms of fruits and vegetables (including frozen, canned, dried and fresh) available in their homes. Based on these statements, AFFI highlights that the messages communicated by the DGA can be very beneficial in directing desired outcomes. Promoting the intake of fruits and vegetables is a central message in the current and

past DGAs. The question of why the DGAs have been unable to significantly affect fruit and vegetable consumption and the role the DGA may have in achieving this is an example worthy of USDA, HHS and NASEM review. It is possible these answers can be found in what programs it affects, how it is being used and how the messages in the DGA are communicated. Considerations such as these are important for making reforms to the DGA in the future.

A robust discussion about potential reform in the length of time between modification to the Dietary Guidelines would be beneficial to ensure that there is sufficient time for science and evidence to support changes to the guidelines. Nutrition science is ever evolving, and only the totality of evidence can amount to real and meaningful nutrition recommendations. In the future, this can be achieved if more time was allowed to collect and review data.

AFFI is committed to aiding the Agencies in their review of the Dietary Guidelines and the DGAC nomination process, as we are invested in important public health nutrition guidance. We ask that the Agencies please examine how the research questions and thus the scope of the Dietary Guidelines are defined, how experts are selected for the DGAC, how rigorous science is selected for inclusion in the guidelines and how the Dietary Guidelines are affecting public health so they may be further reformed. To achieve this, adequate time must be allotted to this process. Thank you again for the opportunity to provide feedback and input on the Dietary Guidelines. Please let us know if you have any further questions.

Respectfully submitted,



Dr. Donna Garren
Senior Vice President, Scientific and Regulatory Affairs
American Frozen Food Institute