



Mr. Brandon Lipps
Acting Deputy Undersecretary
Food, Nutrition, and Consumer Services
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, VA
22302-1500

Presented orally on November 28, 2017, at USDA headquarters.

RE: Dietary Guidelines Listening Session

The Can Manufacturers Institute (CMI) appreciates this opportunity to provide comments on the Dietary Guidelines for Americans (DGA) to the U.S. Department of Agriculture (USDA).

CMI is the national trade association of the metal and composite can manufacturing industry and its suppliers in the United States. The can industry accounts for the annual domestic production of approximately 124 billion food, beverage and other metal cans; which employs more than 20,000 people with plants in 33 states and Puerto Rico; and generates about \$13.3 billion in direct economic activity. Our members are committed to providing safe, nutritious and refreshing canned food and beverages to consumers.

CMI appreciates the National Academy of Sciences Health and Medical Division (HMD) report on the DGA process¹ and agrees with the five core values identified. We hope that USDA and the U.S. Department of Health and Human Services (HHS) regard the following values as pillars as they reform the DGA process: enhance transparency, promote diversity of expertise and experience, support a deliberative process, manage biases and conflicts of interest, and adopt state-of-the-art processes and methods. CMI also asks that USDA please move forward in a transparent fashion and update stakeholders as often as possible about the timeline and what changes to expect, and not to expect, in the 2020 DGA process.

CMI understands that USDA has much to consider from the HMD report and asks that USDA please prioritize the implementation of the following themes from the report:

1. Enhance food pattern modeling to better reflect the complex interactions involved, variability in intakes and range of possible healthful diets.
2. Implement more opportunities for public comment
3. Promote diversity of experience throughout the DGA process

¹ National Academies of Sciences Health and Medical Division. Redesigning the process for establishing the Dietary Guidelines for Americans. September 2017. <http://nationalacademies.org/hmd/reports/2017/redesigning-the-process-for-establishing-the-dietary-guidelines-for-americans.aspx>

Food Pattern Modeling

CMI supports the HMD committee recommendation to enhance food pattern modeling to consider the range of possible healthful diets. CMI agrees that food pattern modeling should be less deterministic and more exploratory. The HMD outlines the following process:

1. Establish energy levels
2. Establish nutrient goals
3. Establish food groups
4. Develop food groups composites and nutrient profiles
5. Model inputs and constraints

CMI conducted menu modeling following similar steps and demonstrated that a canned food centric menu meets MyPlate nutrition guidance while keeping sodium and saturated fat under recommended levels. CMI's menu modeling exercise is just one of many ways a healthy adult could meet nutrient requirements, however, this diversity in nutritionally adequate diets have not been explored or communicated effectively in previous iterations of the DGAs. For example, the 2015 Dietary Guidelines² continued to use limiting language around fruit and vegetable recommendations such as “no-sugar-added versions” and “no-salt-added” when, as CMI demonstrated, it is entirely possible to eat canned foods of all types and meet nutrient requirements.

As USDA is aware, all language in the DGA affects important food policies and feeding programs. These feeding programs are often the source of nutrition and food education to those who depend on them. The Produce for Better Health Foundation found that government guidelines reinforcing the healthfulness of *all* forms of fruits and vegetables positively impacts consumers' perceptions of packaged fruits and vegetables. Limiting language over-emphasizes the benefits of fresh fruits and vegetables, detracts from the perceived healthfulness of packaged fruits and vegetables.³ CMI urges USDA to better translate the guidelines into consumer-friendly messages such as “when including more fruits and vegetables in your diet, all forms of fruits and vegetables matter—fresh, frozen, canned, dried and 100% fruit or vegetable juice.”

We hope USDA considers the HMD recommendation to use dietary modeling to explore the possible healthy diets and re-frame and re-communicate their food-based recommendations accordingly.

Public Comment

CMI agrees with the HMD committee that the DGA process would benefit from an increase in stakeholder participation. We ask that USDA request nominations for the Dietary Guidelines Scientific Advisory Committee (DGSAC) and request comment on the DGSAC appointees. USDA should also allow stakeholders to comment on the advisory committee report as well as the USDA-developed policy document. In the future, we hope that USDA and HHS eventually implement the HMD recommendation that stakeholders are proactively involved to comment on the research questions or topics for consideration.

² Department of Agriculture and U.S. Department of Health and Human Services. Dietary Guidelines for Americans, 2015-2020. 8th Edition, Washington, DC: U.S. Government Printing Office, January 2016.

³ Impact of Limiting Language in Government Recommendations on Fruit and Vegetable Consumption. Produce for Better Health Foundation, 2015.

Promote Diversity of Experience

It is inevitable that experts will have biases, but it is critical that the biases of experts on the DGSAC should be balanced among a broad representation of perspectives. The conflicts of interest that should be considered should be both financial and non-financial. The process for how these conflicts of interest are managed while still including experts from a wide range of experience may need to be developed into a formal document and be available for public comment. At a minimum, USDA should disclose, in detail, how the conflicts of interest will be managed during the 2020 DGA process.

Additionally, CMI concurs with the HMD Committee recommendation to create Technical Expert Panels (TEP) that can provide nuanced, specific guidance to the DGSAC on highly technical areas. Because of the cross-cutting implications of the DGAs, TEPs will be necessary to inform the selected academics on the DGSAC of how their recommendations may affect policy and feeding program implementation, food product reformulation and distribution, food accessibility, waste, and economics.

Thank you for the opportunity to provide comment on the DGAs and the HMD report on its reform. If you have any questions, please contact me at 202-232-4677 or at sgiustino@cancentral.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sylvester A. Giustino', written in a cursive style.

Sylvester A. Giustino
Director, Government & Technical Affairs
Can Manufacturers Institute