



USDA Listening Session on the *Dietary Guidelines for Americans*

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November 28, 2017

Thank you for the opportunity to testify on behalf of the Center for Science in the Public Interest on the *Dietary Guidelines for Americans* and the National Academies' review of the process for developing the guidelines.

First, we would like to underscore that the *DGAs* have historically had a strong science base, and that the advisory committees have exhibited expertise and scientific integrity in their reviews of the science. Despite sometimes differing public perceptions, the *DGA* recommendations have remained consistent over the years—encouraging a diet rich in fruits, vegetables, and whole grains, while limiting excess sodium, saturated fat, refined grains, and added sugars. The details may have changed, but the basic message has remained consistent.

The controversy surrounding the most recent guidelines was fueled by man-bites-dog headlines, special interests, diet-book authors, and political interference. It should come as no surprise that industry has an interest in undermining the acceptance of the guidelines; unhealthy foods and beverages are available nearly everywhere we go and are served to us in extreme portions.

The National Academies' reports make two critical points with which we strongly agree. First, while the *DGAs* are based on solid, scientific methods, the process, like all processes, can evolve and be strengthened. Second, improvements to make the process more transparent will bolster trust in the government's advice to consumers.

CSPI welcomes changes that increase transparency throughout the process. For example, the agencies could request public comment on the list of provisional advisory committee appointees and their known conflicts of

interest, similar to the National Academies' own process. In addition, we support the National Academies' call for a clear explanation of substantive changes between the Advisory Committee's Scientific Report and the final Dietary Guidelines.

However, CSPI is concerned about several of the reports' recommendations. Specifically, we strongly oppose the employment of an external third party to develop an initial list of nominees. This recommendation would introduce additional biases to the process—the opposite of the reports' intent.

In addition, although CSPI appreciates the Academies' recommendation to create continuity between *DGA* cycles and employ specific technical experts, we are concerned that setting up the proposed continuity committees will be time consuming and difficult to implement, and will introduce new biases with fewer opportunities for public engagement.

In conclusion, scientific evidence should continue to drive the process of developing the *DGAs*, as it has in the past, and we encourage the agencies to make the process more transparent.