



Corn Refiners Association (CRA) Comments for USDA Listening Session on Dietary Guidelines

CRA appreciates opportunity to provide comments on process for Dietary Guidelines.

The unbalanced character of the 2015 Dietary Guidelines Committee and its numerous recommendations without appropriate scientific foundation have focused attention on the need to enhance the scientific integrity of the Dietary Guidelines process. However, the need to strengthen the scientific basis for recommendations dates to the original Dietary Guidelines in 1980 and the first advisory committee, which preceded the 1985 Guidelines. Far too often, recommendations based on weak science have been included, because of the weak scientific foundation those recommendations have been controversial and because of the controversy, they have become the headline recommendation from that edition. Most regrettably, those recommendations have proven to be inappropriate. That was the case with the “avoid cholesterol” recommendation of 1980¹, the “low fat diet” recommendation of 1990², and there is growing evidence to question the sodium recommendation of 2005³. Inappropriate recommendations are not benign. They distract from appropriate messages, such as “consume five or more servings of fruits and vegetables a day.” Inappropriate recommendations are a disservice to public health, the economy and the credibility of nutrition science.

There is a glaring need to enhance the scientific integrity of the Dietary Guidelines process. Fortunately, the National Academies of Science, Engineering, and Medicine has recently issued two reports making recommendations for how to do so. While those reports did not question the thin statutory framework established for the Guidelines, they made solid recommendations for improving the independence, objectivity, and transparency of the Dietary Guidelines process. Regrettably, those recommendations were developed without regard to important administrative limitations, such as requirements of the Federal Advisory Committee Act or availability of funds for federal advisory committees.

To the extent possible, we recommend the 2020 Dietary Guidelines process incorporate recommendations of the National Academies. Hopefully, the other recommendations to enhance the scientific integrity of the Dietary Guidelines process may follow.

First, set the precedent of seeking a balanced panel by securing third party support in the selection of advisory committee members.

Second, charge the committee to rely exclusively upon science that is transparent with respect to its methodology and data. There should be heavy reliance upon the Nutrition Evidence Library.

¹ From *Nutrition and Your Health: Dietary Guidelines for Americans* (1980): Recommendation 3 (Avoid Too Much Fat, Saturated Fat, and Cholesterol) – “Eating extra saturated fat and cholesterol will increase blood cholesterol levels in most people...Moderate your use of eggs and organ meats (such as liver) ...”

² From *Nutrition and Your Health: Dietary Guidelines for Americans* (1990): Recommendation 3 (Choose a Diet Low in Fat, Saturated Fat, and Cholesterol) – “Populations like ours with diets high in fat have more obesity and certain types of cancer...A diet low in fat makes it easier for you to include a variety of foods you need for nutrients without exceeding your calorie needs because fat contains over twice the calories of an equal amount of carbohydrates or protein...”

³ From *Dietary Guidelines for Americans* (2005): Chapter 8 (Sodium and Potassium) – “Consume less than 2,300 mg (approximately 1 tsp of salt) sodium per day. Choose and prepare food with little salt.”

Third, limit the charge of the committee so that its workload is reasonable and its recommendations are within its competence. Further to this point, the committee should not make recommendations which go beyond the weight of the evidence and beyond what the committee has the means to evaluate.

Fourth, delineate clear requirements regarding individual's conflict of interest. This should not be a process for disqualifying well published scientists because of funding sources for their research, associations, or research findings. This should be a means of managing actual or perceived conflicts of interest and biases, whether financial or non-financial, through creation of a policy on these potential conflicts of interest and biases and a development plan on how to address.

Fifth, and this is admittedly beyond the reach of the 2020 Guidelines process, work with Congress to secure funding for appropriate updating of the DRIs [Dietary Reference Intakes] (which should be the foundation of the Dietary Guidelines), establish a separate process and Guidelines for birth to 24 months, upgrade the NEL, and more broadly enhance the scientific integrity of the Dietary Guidelines process.

Again, we appreciate your consideration of our comments.