



November 23, 2017  
Mr. Brandon Lipps  
Acting Deputy Under Secretary  
USDA Food, Nutrition and Consumer Services

Dear Mr. Lipps,

The Salt Institute respectfully submits the following comments concerning the two reports; “Optimizing the Process for Establishing the Dietary Guidelines for Americans: The Selection Process (February 2017)” and “Redesigning the Process for Establishing the Dietary Guidelines for Americans (September 2017).”

As you may be aware, the Salt Institute has long advocated for concrete action to be taken regarding the overall DGA process and, in particular, the process for selecting members of the Dietary Guidelines Advisory Committee (DGAC). While we were naturally focused on the matter of sodium, we felt that the entire process lacked transparency and the selection process for members of the DGAC was highly exposed to the election of members with biased and parochial views.

We welcome the changes and recommendations stated in these two new documents. They will serve the interests of both science and consumers.

On April 11, 2016, we sent a detailed letter to the Secretary of Agriculture and the Secretary of the Department of Health and Human Services voicing our concern for the DGA Selection Process. In this letter, we pointed out that the DGAC in 2005 derived its sodium consumption recommendations by simply adopting the Dietary Recommended Intakes (“DRIs”), published in 2004 by the Institute of Medicine (“IOM”). This document clearly stated that for sodium, “...because of insufficient data from dose-response trials, an Estimated Average Requirement could not be established and thus a Recommended Dietary Allowance could not be derived.” Despite acknowledging a lack of evidence, the document went on to issue arbitrary recommendations that are followed to this day. One common thread linked the decision to adopt flawed recommendations in the first instance, and then based two subsequent sets of Dietary Guidelines on the flawed DRIs -- the chair of the 2010 DGAC’s subcommittee on electrolytes served in the same capacity when the 2005 Dietary Guidelines were developed, and was the chair of the Panel on Dietary Reference Intakes for Electrolytes and Water, which was responsible for developing the DRI’s. Any rigorous analytical process simply cannot feature one and the same individual piloting the creation of standards and then being charged with evaluating his own recommendations, and then five years later, being tasked once again to re-evaluate his prior evaluation. In the 2015 DGA process, this individual was replaced – by a colleague, who worked with that same individual and was down on the record expressing the very same opinion regarding sodium. It was a classic example of subjecting the process to potential bias.

While it is understandable for certain professionals committed to one or another side of an issue to wish to have their opinions reflected in the Dietary Guidelines, a fresh and objective view of the evidence is what is expressly called for in the five-year review. In fact, it should be a rule of thumb not to have the same individual serve on consecutive five-year Dietary Guideline reviews. The current document on Selection states, “Significant conflicts ought to be avoided, but some situations may exist where the requisite expertise cannot be found in individuals without some conflicts of interest. In these instances, it is

necessary to identify, disclose, and manage the influences in question.” This statement should be expunged from the document because it has become the catchphrase for accepting candidates who should not be on the DGAC. This phrase has been repeated, verbatim, every time the selection process has been compromised and it is unacceptable to imagine that we cannot find objective expertise from within our vast academic community.

In the particular case of sodium, there has been an overwhelming number of peer-reviewed publications during the last half-decade or more that are in conflict with the recommendations of the DGA. These publications did not query the possible benefits of cutting back on sodium in reducing blood pressure, as currently recommended by the DGA, but rather observed the greatly increased risks to the population’s overall morbidity and mortality, if the DGA recommendations were followed. It is this new body of evidence on total health outcomes that motivated the Consolidated Appropriations Act, 2016, to reject the implementation of further sodium reduction work until the Dietary Reference Intake Review on Sodium is completed.

The Salt Institute agrees with all the recommendations outlined in the document, “Redesigning the Process for Establishing the Dietary Guidelines for Americans.” However, we would like consideration to be given to the quality of the evidence reviewed and a statement in lay language, understood by consumers, made regarding the overall quality and consequence of the evidence. Consumers and particularly media reporters should know both the reliability and significance of the evidence.

There will be times when there is simply not enough reliable evidence to warrant a robust recommendation. This should be made clear to consumers in order to prevent a rush to judgment that may be misplaced. It is also necessary for the DGA to highlight previous recommendations that no longer hold the same value technically, yet may negatively affect consumers. An example of this is the case of yogurt. There was a time in the 1990s when “fat” was considered a negative nutrient and the food industry obliged the market by producing a whole range of low-fat, no-fat products. The opinion towards dairy fat has changed since the 1990s, yet a visit to any supermarket will reveal that low-fat/no-fat yogurt still occupies 90% or more of the yogurt shelf-space, with healthy whole yogurt difficult to find. If the DGA cannot highlight its previous lapses, then the products available to consumers may never improve.

The Salt Institute is also in agreement with the conclusions and recommendations in the document, “Optimizing the Process for Establishing the Dietary Guidelines for Americans: The Selection Process.” It is important that these changes, if made, should be followed rigorously. Along with many others, the Salt Institute hopes to observe the effects on the process and are optimistic that, in the case of sodium, the two solitudes of data recognition will no longer ignore one another. Although this has been a ‘fact of life’ in the past, it has not served the interests of consumer, the ultimate beneficiary of the advice provided in the DGA.

In conclusion, the Salt Institute is in agreement the recommendations iterated in both documents under consideration. We hope that they will contribute to a better process and more meaningful recommendations for consumers in future versions of the DGA.

Yours sincerely,

Lori Roman  
President  
The Salt Institute