



**2020 Dietary Guidelines for Americans USDA Listening Session
Written Comments by the Sugar Association
November 28, 2017**

On behalf of The Sugar Association, thank you for the opportunity to provide comment on the process to develop the 2020 Dietary Guidelines for Americans (DGA). The Sugar Association represents the sugar beet and sugar cane farmers and processors that make up the U.S. Sugar Industry.

The Association commends the USDA's commitment to updating the Dietary Guidelines. As the Guidelines have expanded and evolved to address public health concerns and the nutrition needs of special populations, it is now more important than ever to ensure Americans are provided with evidence-based nutrition guidance to help them make healthful choices.

The departure from established methodology seen during the 2015 cycle opened the door to questions regarding the scientific integrity of the guidelines and the need to review how national nutrition recommendations are established. The detailed review of the Dietary Guidelines process conducted by the National Academies of Science, Engineering, and Medicine provides a timely opportunity to reform the DGA process and rebuild its credibility in the eyes of the general public.

The Sugar Association strongly supports the recommendations set forth in the National Academies reports, *Optimizing the Process for Establishing the Dietary Guidelines for Americans: The Selection Process*, and *Redesigning the Process for Establishing the Dietary Guidelines for Americans*. For the 2020 DGA process, the Sugar Association endorses including the following National Academies recommendations.

For the selection and composition of the advisory committees, an external third party should be employed to screen and review nominees while ensuring the committee represents a balanced panel of professional experts with a wide range of experience and viewpoints. Publishing short biographies on nominees and allowing for a period of public comment can increase transparency of the selection process. Potential conflicts of interests and bias should be publicly disclosed and policies to manage conflicts of interest without disqualifying a well-published scientist need to be developed. Selecting a high-quality committee with the proper expertise is paramount to achieving the goal of the DGAs to provide dietary guidance to the public.

The Association supports a redesigned process to allow for prioritization of topics that will be reviewed during each DGA cycle. The current functions of the DGAC should be redistributed into three different groups to allow for more targeted expertise and opportunities to engage stakeholders. The Dietary Guidelines Planning and Continuity Group will be charged with identifying high priority public health topics for review. The results of the prioritization process will inform research question and guideline development. Questions should be developed with quality in mind and released for public comment to further enhance transparency in the process. The development of the question is vital to the output; attention should be paid to ensure the right



questions are being asked in order to find high-quality conclusions and science-based recommendations.

Based on the fact that the Dietary Guidelines has to be established on the highest standards of scientific data and analyses to reach the strongest recommendations, the Association continues to support strengthening the Nutrition Evidence Library (NEL) process. The NEL was designed to create a rigorous protocol-driven methodology designed to minimize bias, maximize transparency, and insure high quality systematic reviews. Not only should the NEL be used to answer the majority of questions, the manner by which the process is employed needs to be consistent across topics and questions.

The Association has serious concerns regarding the National Academies' recommendation to enhance food pattern modeling. Modeling is a great tool to show how recommended food and nutrient intakes can be achieved a variety of ways within calorie requirements. However, modeling is not empirical evidence suggesting positive health outcomes and should not be used to set recommendations for foods or nutrients. There was an overreliance on modeling in the 2015 edition and the influence that USDA food pattern modeling now has over the DGAs is far too great given the fact that these patterns remain untested. Until trials are conducted to test USDA patterns versus other patterns containing similar caloric amounts as well as similar macronutrient compositions with varying food choices, food modeling needs to be vastly deemphasized. Food pattern modeling is a method but it is not a means to a recommendation.

With regards to the inclusion of nutrition guidance for infants and toddlers birth to 24 months, we would be remiss if we did not express concern over the lack of quality evidence to support the development of comprehensive guidelines. During this critical growth and development period, infants and toddlers have unique nutritional needs. To address the current state of knowledge and identify areas of research needs, a separate committee of experts including pediatricians, pediatric nutritionists and pediatric nutrition researchers, infant and toddler food industry scientists, and developmental experts should be assembled. We urge you to exercise caution in how this is handled and recommend not overstating where the scientific evidence lies; any recommendation that comes out of this first edition could take decades to correct.

We recognize this is beyond the realistic scope of the 2020-2025 cycle; however, the Association would like to strongly emphasize the need to develop a formal plan to regularly update the Dietary Reference Intakes (DRIs). DRIs should be the foundation for future editions of the DGA. Dietary guidelines, which are based on the DRIs, have the potential to improve nutrient intakes for consumers who follow them. A Congressional mandate should allocate funds to update DRI reports for each nutrient every 10 years. Ideally, the DGA and DRI updates would be synchronized to take place every 10 years so updated DRIs serve as the basis for DGA recommendations.

Thank you again for the opportunity to provide comment on this important effort to reform and strengthen the Dietary Guidelines for Americans process. We look forward to continuing to participate as the 2020 cycle gets under way.