



November 28, 2017

Attention: Susan Cole, Executive Communication Analyst
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2020 Dietary Guidelines for Americans (DGA) Listening Session

Invited Comments from USA Rice

Thank you for providing USA Rice Federation the opportunity to comment on the Health and Medicine Division (HMD) of the National Academies of Science, Medicine and reports regarding the DGA-committee selection and process redesign. The USA Rice Federation is the global advocate for all segments of the U.S. rice industry. More than 20 billion pounds of short-, medium- and long-grain, and organic and specialty rice are grown and harvested each year to the highest quality standards by farmers in Arkansas, California, Louisiana, Mississippi, Texas and Missouri. As a USDA *MyPlate* strategic communications partner, we support the goals of the Administration to be transparent, data driven, science based, and to work with all stakeholders. We write this letter in support of the recommendations made by the HMD of the National Academies of Science, Medicine.

Re: *“Optimizing the Process for Establishing the Dietary Guidelines for Americans: The Selection Process”*

USA Rice agrees with the recommendations to increase transparency and reduce bias when identifying potential committee candidates. We see the value in creating a third-party selection committee and soliciting public comments during the nomination process. It is the hope of USA Rice that an external review process and public input may diversify the content experts and provide a broader range of viewpoints. Past years have strongly focused on public health experts. Thus, we recommend including experts representing federal nutrition programs, National School Lunch and the food industry, along with food scientists, toxicologists and risk assessment experts. The committee should also have strong representation from nutrition professionals who have practical expertise and experience in feeding individuals throughout the lifecycle (pediatrics to senior care).

Re: *“Redesigning the Process for Establishing the Dietary Guidelines for Americans”*

It is likely that all stakeholders stress that the DGAs should be evidence-based and follow the most up-to-date, rigorous process for evaluation. In accordance with this standard, USA Rice concurs that developing food modeling and dietary pattern tools should be a priority given the complexity of the diet. As a start, the committee should move away from measuring individual foods and nutrients against chronic disease risk. Rather than asking questions like – *what is the evidence that a particular food or nutrient reduces the risk for chronic disease* – devise models of food intake that support health. The movement should be towards the variety and diversity of patterns that would provide adequacy and balance. Recommendations to limit/avoid or focus on a particular nutrient or food category has not led to meaningful changes in behavior or in improvements in public health. In some instances, taking a single food or nutrient out of context of the entire diet, is not only unrealistic, it can be misleading and unhelpful. Consider a diet that includes a mix of whole, enriched and refined grains yet provides adequate nutrients and phytochemicals. This is demonstrated in the Central American dietary pattern of corn, beans and rice. This typical diet has been shown to provide nutrient balance and even help control blood sugar. However, parsed separately, corn, beans and rice are often considered negative for blood sugar management, therefore diabetes risk.

We encourage the committee to design guidelines that consider the vast number of healthy dietary patterns, while being inclusive of diverse demographics, economic circumstances, cultures and ages. We recognize the challenges faced, but we are confident that with contributions from all stakeholders, a balanced, inclusive, trustworthy and effective set of dietary guidelines can be constructed.

Sincerely,

Ben Mosley
Vice President, Government Affairs
USA Rice