

# Comments Summary Report

*Submission Date Between 01/24/2009 and 04/23/2009*

**Key Topic: Evidence-based Review Process**

**Comment ID:** 000282

**Submission Date:** 02/08/2009

**Organization Type:** Educational Institution

**Organization Name:** Prince George's Community College

**First Name:** Sinai

**Last Name:** Guerrero

**Job Title:** student

**Key Topic:** Evidence-based Review Process, Other

**Sub Topic:**

**Attachment:** N

**Comment:** America is a land full of diversity and culture; and foods are one of them. Not many ethnic groups are willing to change their diets due to strong beliefs like tradition and possibly even comfort from being homesick. But not many diverse Americans know that their own cultural foods may be unhealthy and may have been the leading causes of their family's background deaths. For example: African-Americans have a likelihood of developing and dying from heart diseases due to high consumption of fried foods.

In order to change the lifestyles or to impact most diverse Americans is to provide a chapter of epidemiological studies of each diverse Americans' diet and what are the leading causes of death, due to their dietary habits. For example: Mexico's diet consists of cornmeal dough. A common dish made by cornmeal dough is tamales. Mexico's leading cause of death is heart disease...

If 2010 Dietary Guidelines for Americans can provide this kind of information then I assure it will impact most diverse Americans (make sure to have language translator so that each race can read and understand it).

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Submission Date Between 01/24/2009 and 04/23/2009

Key Topic: Evidence-based Review Process

**Comment ID:** 000412

**Submission Date:** 04/08/2009

**Organization Type:** Educational Institution

**Organization Name:** University of Illinois at Urbana-Champaign

**First Name:** Donald

**Last Name:** Layman

**Job Title:** Professor Emeritus

**Key Topic:** Evidence-based Review Process, Protein

**Sub Topic:**

**Attachment:** Y

**Comment:** I urge the DGC to review the evidence concerning protein needs for adults. My attached comments have been peer-reviewed and appeared as a commentary in the March 2009 issue of the journal Nutrition & Metabolism. I feel these comments are consistent with the DRI guidelines of the IOM and represent important new advice for consumers. I would be pleased to provide additional written or oral comments to the DGC at your convenience. Don Layman

**Comment ID:** 000260

**Submission Date:** 01/31/2009

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Keith

**Last Name:** Herman

**Job Title:**

**Key Topic:** Alcoholic Beverages, Eating Patterns, Energy Balance/Physical Activity, Evidence-based Review Process, Fats, Food Groups, Nutrient Density/Discretionary Calc, Vitamins

**Sub Topic:**

**Attachment:** N

**Comment:** The first rule of research is to not recreate what someone else has already done. After five years of analyzing all of the relevant studies, in November of 2007 the World Cancer Research Fund published Food, Nutrition, Physical Activity, and the Prevention of Cancer: a Global Perspective . This 500 page report was the joint conclusion of committees from five countries. This is the most accurate, unbiased, scientifically rigorous, evaluation of diet, physical activity and health ever performed. The Report concludes with these ten summary recommendations that are designed to reduce the risk of all illnesses, not just cancer:

1. Be as lean as possible without becoming underweight.
2. Be physically active for at least 30 minutes every day.
3. Avoid sugary drinks. Limit consumption of energy-dense foods (particularly processed foods high in added sugar, or low in fiber, or high in fat).
4. Limit consumption of red meats (such as beef, pork and lamb) and avoid processed meats.
5. Eat mostly foods of plant origin (vegetables, fruits, whole grains, and legumes)

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6. If consumed at all, limit alcoholic drinks to 2 for men and 1 for women a day.
7. Limit consumption of salty foods and foods processed with salt (sodium).
8. Don't use supplements to protect against cancer.
9. It is best for mothers to breastfeed exclusively for up to 6 months and then add other liquids and foods.

I encourage the US to officially adopt these guidelines and do away with the biased, inaccurate, Food Guide Pyramid and outdated "food groups" that are increasing our nation's health care problems.

Keith Herman

**Comment ID:** 000337

**Submission Date:** 02/11/2009

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:** Glenn & Debbie

**Last Name:** Carson

**Job Title:**

**Key Topic:** Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Evidence-based Review Process, Food Groups, Nutrient Density/Discretionary Calc, Protein

**Sub Topic:** Fiber, Fruits, Glycemic index, Grains, Whole grains, MyPyramid, Vegetables, Weight loss, Weight maintenance, Whole grains

**Attachment:** N

**Comment:** We urge the USDA to emphasize a plant-based diet, including fruits, vegetables, whole grains, beans, nuts and legumes and to avoid processed foods. Such a diet will result in weight loss/maintenance and numerous health benefits.

**Comment ID:** 000238

**Submission Date:** 01/28/2009

**Organization Type:** Individual/Professional

**Organization Name:**

**First Name:**

**Last Name:**

**Job Title:**

**Key Topic:** Carbohydrates, Evidence-based Review Process, Fats, Food Groups, Nutrient Density/Discretionary Calc, Protein

**Sub Topic:** Cholesterol, Fiber, Grains, Whole grains, Low carbohydrate, Meat, Beans, Eggs, Fish, and Nuts, Whole grains

**Attachment:** N

**Comment:** Please read "Good Calories, Bad Calories" by Gary Taubes before proceeding with new dietary recommendations. It's a practical, down-to-earth look at the dietary research of the past hundred years, and it proves, with no doubts whatsoever, that a high-protein, high-fat diet is the surest way to a healthy, balanced body.

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**Key Topic: Evidence-based Review Process**

Anyone who's pushing a high-carb, low-fat diet has obviously not seen the true facts. And honestly, there's no way any of us can say anything truly significant in 2000 characters or less... but Taubes has done the years of medical research?it's what he does?and he lays out the common fallacies and misconceptions, and shows how and why things have gotten so far off track.

Please read it; if you're in a position of influencing anyone else's eating patterns, you owe it to yourself to get the clear facts, and you owe it to those who are looking to you for them as well.

**Comment ID:** 000240

**Submission Date:** 01/28/2009

**Organization Type:** Individual/Professional

**Organization Name:** YMCA, certified degreed trainer and nutritionist

**First Name:** Joshua

**Last Name:** Hunnicutt

**Job Title:** Fitness Director

**Key Topic:** Carbohydrates, Evidence-based Review Process, Food Groups, Protein

**Sub Topic:** Glycemic index, Grains, Whole grains, Low carbohydrate, Meat, Beans, Eggs, Fish, and Nuts, Milk, Whole grains

**Attachment:** N

**Comment:** It seems absurd that the homonal responses to food are ignored. It is scientifically accepted and evident both carbohydrates and protein produce a significant hormonal response which can dramatically affect health. Protein has been "kicked to the curb" and is now not even factored as a percentage, just a body weight formula which is in no way the "balanced" diet which has been preached for decades. It is blatantly obvious to in out of the box thinking/researching professional that there has to be some sort of lobby influence on the new pyramid. Our society continues to dramatically decline in health, while our pyramid preaches 3 cups of dairy whether you are on a 1400 or 3000 calorie eating plan. Rather than classifying refined grains as discretionary, we are told they are okay, as long as we get mostly whole grains. The pyramid ignores foods inflammatory factor and hyperinsulinemia, which so much evidence points to as the bane of modern man and why we are so diseased. The closed-mindedness of our USDA is crushing our health and one can hope for some sort of correction. I will be happy to attach plenty of evidence if needed.

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*Submission Date Between 01/24/2009 and 04/23/2009*

**Key Topic: Evidence-based Review Process**

**Comment ID:** 000246

**Submission Date:** 01/28/2009

**Organization Type:** Individual/Professional

**Organization Name:** N/A

**First Name:** Henry

**Last Name:** Miller

**Job Title:** programmer

**Key Topic:** Evidence-based Review Process

**Sub Topic:**

**Attachment:** N

**Comment:** If it isn't backed by a long term, large scale, controlled, double blind, intervention and peer reviewed study; then it does not belong on any recommendations list. There are a lot of different submissions here, most are backed by an agenda or insufficient science. Real science is hard, but it we don't have that real science we can't say anything useful.

It is better to publish nothing because we don't know than to publish a guess that isn't backed up by real science.

**Comment ID:** 000458

**Submission Date:** 04/23/2009

**Organization Type:** Industry Association

**Organization Name:** American Bakers Association, North American Millers' Association, Grain Foods Foundation, Wheat Foods Council, National Association of Wheat Growers

**First Name:** Lee

**Last Name:** Sanders

**Job Title:** Vice President, Government Relations & Public Affairs

**Key Topic:** Carbohydrates, Evidence-based Review Process, Food Groups, Vitamins

**Sub Topic:** B Vitamins, Fiber, Folate, Glycemic index, Grains, Whole grains, Whole grains

**Attachment:** Y

**Comment:** Please see attached comments from the American Bakers Association, North American Millers' Association, Grain Foods Foundation, Wheat Foods Council, and National Association of Wheat Growers

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Submission Date Between 01/24/2009 and 04/23/2009

Key Topic: Evidence-based Review Process

**Comment ID:** 000454

**Submission Date:** 04/23/2009

**Organization Type:** Industry Association

**Organization Name:** American Bakers Association, North American Millers' Association, Grain Foods Foundation, Wheat Foods Council, National Association of Wheat Growers

**First Name:** Lee

**Last Name:** Sanders

**Job Title:** Senior Vice President, Government Relations & Public Affairs

**Key Topic:** Carbohydrates, Evidence-based Review Process, Vitamins

**Sub Topic:** B Vitamins, Fiber, Folate, Glycemic index, Whole grains

**Attachment:** Y

**Comment:** Please see attached comments from the American Bakers Association, North American Millers' Association, Grain Foods Foundation, Wheat Foods Council, and National Association of Wheat Growers

**Comment ID:** 000444

**Submission Date:** 04/23/2009

**Organization Type:** Industry Association

**Organization Name:** National Cattlemen's Beef Association

**First Name:** Kristina

**Last Name:** Butts

**Job Title:** Manager, Legislative Affairs

**Key Topic:** Evidence-based Review Process, Fats

**Sub Topic:** Cholesterol, Saturated fatty acids

**Attachment:** Y

**Comment:** Cardiovascular disease is the number one cause of disease-related death among Americans. As the 2010 Dietary Guidelines strives to recommend eating patterns consistent with the reduction of cardiovascular disease and other chronic diseases, the beef industry feels it is pertinent to provide the DGAC with a comprehensive review of the role of beef in cardiovascular health outcomes. To accomplish this goal, a systematic review of the literature regarding the role of beef consumption, independent of other red and processed meats, in cardiovascular health outcomes with an emphasis on LDL cholesterol and blood pressure has been conducted. The results of this evidence-based review provide strong evidence that lean beef, similar to skinless poultry, lowers LDL cholesterol between 7-12% when included in diets meeting the fat and cholesterol advice of the 2005 Dietary Guidelines and has little or no effect on blood pressure. With lean beef making up 66% of fresh beef in the meat case today, these data suggest Americans should be encouraged to continue consumption of lean beef as part of a heart healthy diet.

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**Key Topic: Evidence-based Review Process**

**Comment ID:** 000447

**Submission Date:** 04/23/2009

**Organization Type:** Industry Association

**Organization Name:** Salt Institute

**First Name:** Morton

**Last Name:** Satin

**Job Title:** Director, Technical and Regulatory Affairs

**Key Topic:** Evidence-based Review Process, Fluid and Electrolytes

**Sub Topic:** Sodium

**Attachment:** Y

**Comment:** We are distressed at the continued retreat from public engagement and transparency with conversion of the Committee's April 29-30 meeting into a webinar. This runs directly counter to the Administration's encouragement of greater transparency. We earlier registered our continued disappointment that the Committee has turned its back on another Administration commitment - to improve the process in considering science. By not pre-defining quality standards for inclusion in the evidence-based review process being utilized, the Committee invites the same kind of selective, expert opinion criticisms leveled at earlier panels.

Our full commentary is contained in the accompanying attachment.

**Comment ID:** 000248

**Submission Date:** 01/28/2009

**Organization Type:** Industry Association

**Organization Name:** Salt Institute

**First Name:** Morton

**Last Name:** Satin

**Job Title:** Director, Technical and Regulatory Affairs

**Key Topic:** Evidence-based Review Process, Fluid and Electrolytes

**Sub Topic:**

**Attachment:** Y

**Comment:** The Dietary Guidelines Advisory Committee has repeatedly stated that it will pursue an evidence-based process to review the available science in the development of its recommendations for 2010. Unfortunately, adherence to a strict evidence-based process has not been the case in the development of past guidelines. Recommendations confidently portrayed as evidence-based were forced to be withdrawn as was the case for fat consumption.

We fear a similar situation will occur with the coming iteration of the 2010 Guidelines. The process for the development of recommendations on electrolytes is being driven by the preconceived notion that the overwhelming issue to be addressed with electrolytes is the reduction of blood pressure uniquely through a lowering of salt intakes. This view

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appears to be held so tightly that many of the principles developed to pursue an acceptable evidence-based review may be abandoned.

While there is little doubt that a reduction in blood pressure would benefit a significant proportion of the population, the means and effectiveness of the dietary intervention recommended to accomplish this is critical - it cannot be the result of expert opinion. It can only result from scientific data of the highest quality. Blood pressure reduction can be accomplished in a great many ways, but the preferred means should not result in negative consequences for certain segments of the population. While it is bad enough to have an intervention lead to unintended health consequences, if such consequences were suspected or known beforehand, then proceeding with such recommendations would be scandalous.

Because of the mistaken understanding that a reduction in salt intake will reduce cardiovascular events, the gold standard for dietary interventions for post-heart failure patients is a low sodium diet. Recent evidence indicates that those patients placed on low-sodium diets die or are readmitted to hospital in far greater numbers than those that are not.

**Comment ID:** 000387

**Submission Date:** 03/23/2009

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** Life Sciences Research Office (LSRO)

**First Name:** Michael

**Last Name:** Falk

**Job Title:** Executive Director

**Key Topic:** Carbohydrates, Evidence-based Review Process, Other

**Sub Topic:** Fiber, Glycemic index, Whole grains

**Attachment:** Y

**Comment:** Attached please find a letter of submission and our report pertaining to whole grain regulatory definitions, whole grains consumption and public health for consideration by the DGAC.

**Comment ID:** 000448

**Submission Date:** 04/23/2009

**Organization Type:** Nonprofit/Voluntary

**Organization Name:** Farm Sanctuary

**First Name:** Delcianna

**Last Name:** Winders

**Job Title:** Legal Director of Campaigns

**Key Topic:** Evidence-based Review Process, Food Groups, Other

**Sub Topic:** Milk

**Attachment:** Y

**Comment:** Farm Sanctuary, the nation's largest farm animal protection organization, respectfully requests that the Dietary Guidelines Advisory Committee, in revising the 2005 Dietary Guidelines for Americans, reduce the emphasis placed on dairy products. The Dietary Guidelines are statutorily required to be science-based, and science simply does not

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support the emphasis placed on dairy products as part of a healthful diet in the 2005 Dietary Guidelines. To the contrary, scientific studies have shown that dairy products contribute to the very same chronic diseases that the Guidelines aim to reduce, such as prostate cancer and breast cancer. To truly promote the health of Americans and reduce the risk of chronic diseases, the Guidelines should tell the truth about dairy and its role in chronic disease. President Obama has promised to "restore science to its rightful place," and if this commitment is to be a reality the Dietary Guidelines for Americans must be revised based on sound scientific evidence.

**Comment ID:** 000247

**Submission Date:** 01/28/2009

**Organization Type:** Professional Association

**Organization Name:** American Dietetic Association

**First Name:** Jennifer

**Last Name:** Weber

**Job Title:** Manager, National Nutrition Policy

**Key Topic:** Eating Patterns, Evidence-based Review Process, Nutrient Density/Discretionary Calc, Other

**Sub Topic:**

**Attachment:** Y

**Comment:** The American Dietetic Association appreciates the opportunity to provide input to the 2010 Dietary Guidelines Advisory Committee. ADA is the world's largest organization of food and nutrition professionals and is committed to optimizing the nation's health through food and nutrition. ADA has three key recommendations it believes would benefit the scientific underpinning, implementation and communication of the Dietary Guidelines for Americans.

Interval for Issuance of the Dietary Guidelines -- Public trust in federal dietary guidance is premised on the Dietary Guidelines delivering credible recommendations, substantiated by sound science. Issuing the Dietary Guidelines every five years does not provide adequate time to conduct and review emerging nutrition and health research. Five years is not enough time to effectively roll out and communicate to consumers what the Dietary Guidelines entail. ADA recommends 10-year intervals instead, which would strengthen the research basis and allow follow through in the implementation and communication.

Focus on Foods and Meal Patterns -- The Dietary Guidelines should focus on food-based recommendations and meal patterns. While it is technically true that all foods can fit with careful planning -- some fit more often than others and some fit very infrequently. Research on meal patterns, nutrient density and physical activity must be reviewed and reflected in the recommendations, giving guidance on the types and amounts of foods people should, and should not consume as the basis of their dietary intake.

Inclusion of Consumer Research -- Consumer research should be considered as part of the committee's deliberations, along with scientific diet and nutrition studies. It is not enough to summarize the latest science on nutrient and disease relationships and to offer advice if there is no way to make a dent on consumer healthy. The committee should also consider the factors that influence what people eat and what barriers exist to the adoption of the Dietary Guidelines by consumers.