Comments Summary Report

Submission Date Between 10/29/2009 and 04/07/2010

Key Topic: Fats

Comment ID: 000922

Submission Date: 04/07/2010

Organization Type: Educational Institution

Organization Name: Johns Hopkins Center for a Livable Future

First Name: Amanda

Last Name: Behrens

Job Title: Program Manager

Key Topic: Eating Patterns, Fats, Nutrient Density/Discretionary Calc, Protein

Sub Topic: Oils, Unsaturated fatty acids, Saturated fatty acids

Attachment: Y

Comment: There are a large number of Americans who simply do not have adequate access to all of the foods recommended in the Dietary Guidelines. In addition, the manner in which food is produced, processed, transported and consumed in the US affects the nutrient quality and availability of the recommended foods. We propose that issues of geographic and financial access and agricultural sustainability be addressed in the Dietary Guidelines. The Guidelines should recommend seeking out local sources of foods, pastured meat and milk products, and offer suggestions for accessing the recommended, healthy foods when individual access in compromised. Specific suggestions are included in our attached letter.
We thank you for this opportunity to provide comments, The NESAWG Diet, Access and Geography Working Group
http://www.nefood.org/

Comment ID: 000848

Submission Date: 02/04/2010

Organization Type: Educational Institution

Organization Name: Pencader Charter High School

First Name: Catherine

Last Name: Scott Riggs

Job Title: Department Head PE, HEalth and Nutrition

Key Topic: Fats

Sub Topic: Cholesterol

Attachment: N

Comment: In considering the % of daily calories that should come from fat in the diet, I believe it should be more toward 20%-25%.
Foods that have trans fat over a certain amount should be required to have a warning label that stands out.

Comments Summary Report

Submission Date Between 10/29/2009 and 04/07/2010

Key Topic: Fats

Comment ID: 000853

Submission Date: 02/09/2010

Organization Type: Educational Institution

Organization Name:

First Name: Matthew

Last Name: Taylor

Job Title:

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: N

Comment: Omega 3's are in longstanding discussion amongst medical research. The benefits of adequate omega 3 intake is are shown in studies time and time again. The biochemical metabolism of these FA's (especially DHA & EPA) makes them very effective to combat inflammation and positively effect lipid values. Though Omega-3's are a hot topic in the health community, it has been my experience as a dietetic intern that the general public is either unaware of the specific food sources of omega-3 and have somewhere attained much incorrect information about them. I feel it would be very beneficial for greater information about omega-3's and food sources to circulate and reach the general public through informational sources such as the dietary guidelines.

Comment ID: 000870

Submission Date: 02/20/2010

Organization Type: Individual/Professional

Organization Name: Self

First Name: Greg

Last Name: White

Job Title: Mr.

Key Topic: Fats

Sub Topic: Cholesterol

Attachment: N

Comment: It's amazing that with all the evidance to the contrary the USDA is still promoting the myth that eggs are bad for you.

The truth is, and you can ask any doctor, the cholesterol in eggs is a type that does NOT raise bad cholesterol and the egg yellows are the BEST nutrition source on the planet.

Hell use common sense, ALL birds grow to hatch with ONLY the yellow for nutrition. Seen many chicks die of a heart attack ???

Comments Summary Report

Submission Date Between 10/29/2009 and 04/07/2010

Key Topic: Fats

Comment ID: 000828

Submission Date: 01/29/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Clair

Last Name: Nielson

Job Title: Retired

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: I believe it important that panel members be familiar with this recent article on saturated fats by distinguished researchers:

Am J Clin Nutr (January 13, 2010). doi:10.3945/ajcn.2009.27725

Meta-analysis of prospective cohort studies evaluating the association of saturated fat with cardiovascular disease1,2,3,4,5
Patty W Siri-Tarino, Qi Sun, Frank B Hu and Ronald M Krauss

Comment ID: 000835

Submission Date: 02/02/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Matt

Last Name: Brody

Job Title:

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: I would like to request that the literature review that led to the conclusion that saturated fat is correlated with cardivascular disease, be re-considered in light of the january 13, 2010 publication in the American journal of Clinical Nutriation by Krauss, et. al., that "there is no significant evidence for concluding that dietary saturated fat is associated with an increased risk of CHD or CVD. More data are needed to elucidate whether CVD risks are likely to be influenced by the specific nutrients used to replace saturated fat."

"Our results suggested publication bias, such that studies with significant associations tended to be received more favorably for publication. If unpublished studies with null

associations were included in the current analysis, the pooled RR estimate for CVD could be even closer to null."

Comment ID: 000781

Submission Date: 12/21/2009

Organization Type: Individual/Professional

Organization Name:

First Name: KC

Last Name: Hayes

Job Title:

Key Topic: Fats

Sub Topic: Cholesterol, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids

Attachment: Y

Comment: As members of the DGAC review scientific data and discuss their recommendations on changes to the food pyramid, I wanted to bring to your attention a consensus statement recently released by a multidisciplinary panel of nutrition and clinical experts who convened in late 2008 to discuss the science around possible solutions for this replacement of trans fat and the implications that this ingredient change had for food manufacturers. Additionally, the group discussed how two saturated fat replacement solutions, palmitic acid and stearic acid, exert different effects on markers that are important for CVD risk. For instance, while it is known that palmitic acid increases both LDL and HDL cholesterol, there is preliminary evidence that stearic acid increases inflammatory markers and can adversely impact plasma cholesterol profiles when fed in high amounts, especially if included as part of a modified fat structure. There are considerable data on palmitic acid and only preliminary data on stearic acid at high levels of consumption. As the 2010 Dietary Guidelines for Americans are in development it is important for policymakers to recognize that any effort to make a claim about the superiority of one type of saturated fat over another requires more knowledge.

In order to prevent adverse health effects associated with trans fat, the panelists agreed that the preferred option would be to replace trans fats with unsaturated fatty acids or, when needed for baking purposes, a natural or modified saturate. Moreover, ?healthier? baked goods with no trans fats should be consumed in the context of an overall diet containing fruit, vegetables, dairy products and grains.

The full consensus statement is attached for your consideration.

The seven roundtable participants include: George Blackburn, MD; Margo Denke, MD; Richard Feinman, PhD; Christopher Gardner, PhD; KC Hayes, DVM, PhD; Michael McBurney, PhD, FACN; and Jeff Volek, PhD.

Comments Summary Report

Submission Date Between 10/29/2009 and 04/07/2010

Key Topic: Fats

Comment ID: 000790

Submission Date: 01/12/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Nancy

Last Name: Jenkins

Job Title:

Key Topic: Fats

Sub Topic: Cholesterol, Trans fatty acids

Attachment: N

Comment: Please differentiate between trans fats and saturated fats. Manmade trans fats (including margarine) are toxins to the body but unfortunately the digestive system does not recognize them as such. Instead of eliminating them it incorporates them into the fat membranes, partially hydrogenating our cells and disrupting our cell metabolism. Hence they should get much of the blame for clogging our arteries. Saturated fat should not be categorized as just another harmful fat. It is a natural important component of a healthy diet, without which our arteries would not keep their necessary stiffness so that our arteries stay clear of plaque. Saturated fatty acids help unsaturated faty acids work more efficiently. Before 1920 heart disease was rare and people ate plenty of saturated fat. Obesity rates were low as well.
Sugar is often eaten with saturated fat and is the culprit in causing many of our health problems but saturated fat gets the rap.Unrefined coconut oil, a saturated fat, has no cholesterol,nor does palm oil.

Comment ID: 000823

Submission Date: 01/26/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Kelly

Last Name: Moltzen

Job Title: Graduate Student, Dietetic Intern

Key Topic: Fats, Food Groups

Sub Topic: Fish oil, Omega 3 fatty acids, Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vegetables

Attachment: N

Comment: The evidence is clear that omega-3 fatty acids are anti-inflammatory and omega-6 fatty acids are pro-inflammatory. So why do the guidelines recommend having ~10x more omega-6 fatty acids in our diet than omega-3? Historically mankind consumed these fats in a ratio that was much closer to 1:1. It has also been shown that conventionally raised animals and farm-raised fish that have been fed grains have higher levels of omega-6 fatty acids, while grass-fed animals and fish fed a natural diet have higher levels of omega-3 fatty acids. Since the anti-inflammatory nature of omega-3 fat is linked to many beneficial health effects, foods containing omega-3 fats should be highlighted much more in the dietary guidelines. This may mean telling the public to buy grass-fed meats and wild fish, although of course if telling the public to eat more fish, it would also be necessary to include information about being mindful of whether or not one's fish is being sourced from contaminated waters.

Comments Summary Report

Submission Date Between 10/29/2009 and 04/07/2010

Key Topic: Fats

As Dr. Marion Nestle shows us in her book "Food Politics," the beef and dairy industries have contributed substantial amounts of money and lobbying efforts in order for their products to have a place in the Dietary Guidelines. However, the DG should not be based on the lobbying power of the food industry - it should be based on science, and science tells us that the most beneficial foods are fruits, vegetables, and whole grains. As a matter of fact, as Dr. Daphne Miller uncovers in her book "The Jungle Effect" the aspects of food that have proven beneficial over time through various cultures are the foods' antioxidative properties, omega-3 levels, slow-release capabilities, and fermentation capacity.

By relying too much on the term "moderation" and the maxim "all foods can fit," we are confusing the public in terms of which foods are good for us. I have seen this quite clearly through the lens of the American Dietetic Association. If you want clear advice in terms of which foods are healthy, please go to the Hunger and Environmental Nutrition Dietetic Practice Group of the American Dietetic Association.

Comment ID: 000827

Submission Date: 01/28/2010

Organization Type: Industry Association

Organization Name: National Cattlemen's Beef Association

First Name: Shalene

Last Name: McNeill, PhD, RD

Job Title: Executive Director, Human Nutrition Research

Key Topic: Eating Patterns, Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: During the November 2009 Dietary Guidelines Advisory Committee meeting, the Fatty Acids Subcommittee presented findings on the evaluation of:

"The effect of saturated fatty acid intake on the risk of cardiovascular disease (CVD), type 2 diabetes and intermediate markers such as lipid and lipoprotein levels, measures of insulin resistance and inflammation."

Upon review of 12 studies published since 1999, the Subcommittee concluded that saturated fat is positively associated with increased serum total and LDL cholesterol and increased risk for CVD. However, a recent meta-analysis published in the American Journal of Clinical Nutrition by Siri-Tarino, et al. found there is insufficient evidence to conclude saturated fat is associated with an increased risk of coronary heart disease, cardiovascular disease or stroke. This large meta-analysis of 21 well-designed prospective epidemiologic studies with 347,747 subjects also concluded that more data is needed to elucidate whether CVD risks are likely to be influenced by specific nutrients used to replace saturated fat.

In addition, the authors, Patty Siri-Tarino, Qi Sun, Frank Hu and Ron Krauss, state the results of this meta-analysis suggest publication bias, as studies with significant associations tend to be received more favorably for publication. They hypothesize if studies with null associations were included in the current analysis, the pooled RR estimate for CVD could be even closer to null.

We respectfully request that the Fatty Acids Subcommittee include this recent meta-analysis in its evidence-based review on this topic.

Comments Summary Report

Submission Date Between 10/29/2009 and 04/07/2010

Key Topic: Fats

Comment ID: 000789

Submission Date: 01/11/2010

Organization Type: Industry Association

Organization Name: National Cattlemen's Beef Association

First Name: Shalene

Last Name: McNeill, PhD, RD

Job Title: Executive Director, Human Nutrition Research

Key Topic: Eating Patterns, Fats

Sub Topic: MyPyramid, Saturated fatty acids

Attachment: Y

Comment: During the Fatty Acids Subcommittee?s discussion in the recent Dietary Guidelines Advisory Committee meeting, it was stated that the lack of change in fat consumption since the mid-1990s, despite ongoing public health recommendations to decrease fat and saturated fat consumption is related to an increase in meat in the food supply and that the food supply is working against efforts people may make to improve their lifestyle. On behalf of America?s farmers and ranchers, we would like to take this opportunity to clarify the inference that meat limits Americans? efforts to improve their diets. The Beef Industry has committed significant resources to help consumers meet public health recommendations to lower fat and saturated fat intake, through the provision of leaner beef cuts and a continued commitment to educate consumers about selecting, trimming and preparing beef to optimize its leanness, and how to enjoy beef as part of a balanced and varied diet.

The enclosed comments offer three key points essential for the Committee?s consideration: 1.) lean beef is widely available, 2.) lean beef is popular with consumers, and 3.) consumption of beef as part of a healthful, balanced diet consistently results in favorable results in health outcomes.

Nutrient-rich beef remains popular among consumers. Given the dramatic reductions to beef?s saturated fat profile and the availability and popularity of lean beef, it is essential to educate Americans about how to identify, prepare and incorporate lean beef in a healthy diet. Research indicates showing consumers ?how to? improve their diet rather than avoidance messages is the best way to improve Americans? nutritional status and ultimately their health. We suggest educating the public about how to select and prepare lean cuts of beef is central to helping them build and adhere to healthy and enjoyable diets.

Comments Summary Report

Submission Date Between 10/29/2009 and 04/07/2010

Key Topic: Fats

Comment ID: 000846

Submission Date: 02/03/2010

Organization Type: Industry Association

Organization Name: Institute of Shortening and Edible Oils

First Name: Robert

Last Name: Collette

Job Title: President

Key Topic: Fats

Sub Topic:

Attachment: Y

Comment: The Institute of Shortening and Edible Oils (ISEO) recognizes the importance of the DGAC's efforts to improve diets of U.S. consumers and appreciates the opportunity to provide comments on the development of the 2010 Dietary Guidelines for Americans.

Based on recommendations such as the 2005 Dietary Guidelines and with the advent of mandatory trans fat labeling of pre-packaged food in 2006, marked progress has been made in reformulating food products to enable consumers to reduce dietary trans fat intake.

Recent studies indicate that health outcomes associated with dietary changes may vary depending on the nutrient replaced and the type of nutrient or nutrients chosen as substitutes. From these new studies, the impact of changes in dietary fat consumption is different depending on the context of the dietary alteration involving fat (i.e. carbohydrate for saturated fat; monounsaturated fat for saturated fat, etc?). In light of these findings and changes in food formulation to remove trans fat, we encourage the DGAC to evaluate the impacts of total changes in the diet when considering any revision of the target values for daily intake of saturated and trans fats.

Comment ID: 000782

Submission Date: 12/22/2009

Organization Type: Industry Association

Organization Name: National Cattlemen's Beef Association

First Name: Shalene

Last Name: McNeill, PhD, RD

Job Title: Executive Director, Human Nutrition Research

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: N

Comment: Due to common misperceptions about beef's fatty acid profile, it is important to note that on average 33 percent of the saturated fat in beef is stearic acid and over 50 percent of the remaining fatty acids in beef are monounsaturated. In addition, epidemiological evaluations and clinical interventions have failed to yield evidence that red meat and/or beef is independently associated with cardiovascular disease occurrence or development of risk factors. Systematically reviewed data from observational studies concluded that "several

studies have hypothesized the fat content of red meat might be a risk factor for CV; however, there is a lack of evidence to suggest that consuming lean red meat trimmed of excess fat, which is lower in both total fat and SFA, can increase risk of CVD." There are at least 29 lean cuts of beef available in the market place today, yet one high-fat beef cut and only four lean cuts were recognized in the 2005 Dietary Guidelines. Market research indicates more than two-thirds of consumers feel it is important to purchase lean cuts of beef and the 2010 Dietary Guidelines provide an opportunity to educate Americans about how to identify these lean cuts. This educational approach is suggested in the United Kingdom Food Standards Agency's (FSA) "Draft Recommendations on the Promotion of Lower-fat Products including Dairy Products, Fat and Saturated Fat Reductions for Meat Products," which supports encouraging consumers to choose leaner options and use lowfat preparation methods. In addition, they highlight actively promoting messages and the availability of lean meats. We respectfully request guidance similar to that provided by FSA be considered by the Committee to help consumers identify lean cuts of beef. We also request that the DGAC consider the inclusion of a comprehensive list of the 29 lean cuts of beef in the 2010 Dietary Guidelines to provide Americans with an important tool for the choosing a healthy, balanced and enjoyable diet.

Comment ID: 000807

Submission Date: 01/21/2010

Organization Type: Industry Association

Organization Name: National Fisheries Institute

First Name: Jennifer

Last Name: McGuire, MS, RD

Job Title: Manager of Nutrition Communication

Key Topic: Fats, Food Safety

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: Please see the attached comments about nutrition communication as it relates to seafood.

Comment ID: 000830

Submission Date: 02/01/2010

Organization Type: Nonprofit/Voluntary

Organization Name: California Walnut Commission

First Name: Dennis A.

Last Name: Balint

Job Title: CEO

Key Topic: Fats, Food Groups

Sub Topic: Fish oil, Omega 3 fatty acids, Meat, Beans, Eggs, Fish, and Nuts

Attachment: Y

Comment: Dietary Guidelines Comments 2010

Comments Summary Report

Submission Date Between 10/29/2009 and 04/07/2010

Key Topic: Fats

Comment ID: 000772

Submission Date: 12/03/2009

Organization Type: Other

Organization Name: Martek Biosciences Corporation

First Name: Rodney

Last Name: Gray

Job Title: Vice President, Regulatory Affairs

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: At the fourth public meeting of the 2010 Dietary Guidelines Advisory Committee (DGAC) it was noted that the Fatty Acid and Cholesterol Subcommittee will be considering the effect of long-chain omega-3 fatty acids (n-3 LCPUFA) in the maternal diet on breast milk composition and infant health outcomes. Regarding this topic we would like to call your attention to the recently published position of the American Dietetic Association (ADA) on breastfeeding promotion and support. As part of their position development the ADA conducted a systematic review using ADA?s Evidence Analysis Process to answer the following question ?What are the effects of maternal diet or dietary supplements of n-3 fatty acids on breast milk composition and infant health outcomes?? The ADA?s evidence analysis provides certain key observations, in particular, the well-characterized nature of the relationship between direct maternal DHA supplementation through DHA-rich oil and the content of DHA in breast milk and the limited data available for other supplements and even direct consumption of fish.

Comment ID: 000762

Submission Date: 11/18/2009

Organization Type: State/Local Government Agency

Organization Name: New York City Department of Health and Mental Hygiene

First Name:

Last Name:

Job Title:

Key Topic: Fats

Sub Topic: Saturated fatty acids, Trans fatty acids

Attachment: Y

Comment: Trans Fats