



NATIONAL DAIRY COUNCIL®

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October 24, 2008

Carol Davis  
Co-Executive Secretary of the Dietary Guidelines Advisory Committee  
Center of Nutrition for Policy and Promotion  
U.S. Department of Agriculture  
3101 Park Center Drive,  
Room 1034  
Alexandra, Virginia 22302

[Announcement of the First Meeting of the 2010 Dietary Guidelines Advisory Committee and Solicitation of Written Comments Federal Register, October 14, 2008 (Volume 73, Number 199)]

Dear Ms. Davis:

The National Dairy Council (NDC) appreciates the opportunity to respond to the Federal Register Notice for written comments to the Dietary Guidelines Advisory Committee prior to its first meeting.

At a time when the American population is overweight and undernourished, it is more important than ever to help consumers get more nutrition out of the food and beverages they consume. As the Dietary Guidelines Advisory Committee begins its work of drafting new guidelines for Americans, the NDC applauds the leadership of the Departments of Agriculture and Health and Human Services for their crucial efforts to help Americans live healthier lives and reduce the risk of chronic disease.

The NDC is a non-profit organization that initiates and administers nutrition research, develops nutrition education programs, and provides information on nutrition to health professionals and others concerned about good nutrition. The NDC has been a leader in nutrition research, education and communications since 1915. Through its affiliated Dairy Council units, the NDC is recognized throughout the nation as a leader in nutrition research, innovation and education. These programs were established and are funded by U. S. dairy farmers to help increase knowledge of the health benefits of milk and milk products in order to further the public health of the nation.

The NDC supports the use of a science-based process to guide the 2010 Dietary Guidelines Advisory Committee in their decisions as they develop the new guidelines. In particular, the scientific evidence has been accumulating on providing nutrient-rich foods and balancing choices over time to achieve a healthy diet.

Dairy foods are nutrient-rich and the scientific evidence continues to mount on the need for adequate intake of dairy foods every day. New vitamin D guidelines, recently issued by the American Academy of Pediatrics, double the amount of vitamin D recommended for infants,

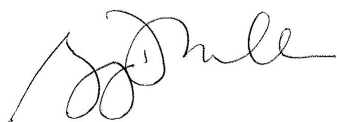
children and adolescents (attached). The substantial increase provides strong support for the importance of adequate amounts of dairy servings per day. The AAP guidelines now recommend that all children receive 400 IU a day of vitamin D beginning in the first few days of life. Children (beginning at one year of age) and adolescents who consume less than one quart (4 cups) per day of vitamin D-fortified milk, should receive a vitamin D supplement of 400 IU a day. In addition to fortified milk, yogurt and cheese are emerging as effective vehicles for Vitamin D intake (1). The previous recommendation, issued in 2003, called for 200 IU per day, beginning in the first two months of life. The AAP continues to recommend 3 servings a day for children and 4 servings a day for teens of low-fat/nonfat milk and milk products. Dairy's nutrient package includes three of the five nutrients children fall short on—calcium, potassium, and magnesium.

The important contribution that at least 3 servings a day of low-fat/nonfat dairy products provide to a healthy diet has been recognized by leading health authorities, including the American Academy of Family Physicians, American Academy of Pediatrics, American Dietetic Association, National Medical Association, National Hispanic Medical Association and the School Nutrition Association. Eight position papers from the leading health professional organizations are attached for consideration as part of the evidence-based library. Importantly, cultural considerations related to dairy consumption, such as lactose intolerance, have been incorporated into many of these organizations' positions.

With the release of the first 2008 Physical Activity Guidelines for Americans, the Dietary Guidelines Advisory Committee now has the opportunity to address the synergy between nutrition and physical activity in the reduction of chronic disease. The synergistic relationship between nutrients, physical activity and several chronic diseases (i.e., osteoporosis, sarcopenia) is well established (2, 3). On bone health, the 2008 Physical Activity Guidelines states "along with having a healthy diet that includes adequate calcium and vitamin D, physical activity is critical for bone development in children and adolescents." It is the challenge of the Dietary Guidelines Advisory Committee to take what was established in the 2008 Physical Activity Guidelines for Americans, integrate what will be learned from the science-based review on the role of diet, and leverage the two in the final 2010 Dietary Guidelines Advisory Committee Report to provide positive guidelines on helping Americans build healthier diets and reduce the risk of chronic disease.

The National Dairy Council appreciates this opportunity to provide comments to the Dietary Guidelines Advisory Committee as you embark in your important work on the *Dietary Guidelines Advisory Committee Report to the Secretaries of Agriculture and Health and Human Services*. As a science-based organization, please consider the NDC as a resource ready to support the work on healthy diets, especially as it relates to scientific perspective on nutrient-rich dairy products.

Sincerely,



**Gregory D. Miller, Ph.D., M.A.C.N.**  
Executive Vice President  
Research, Regulatory and Scientific Affairs  
DMI/National Dairy Council

References:

1. Wagner, D. *J. Agric. Food Chem.*, 56 (17), 7964–7969, 2008.
2. Paddon-Jones, D. *Am J Clin Nutr* 2008;87(suppl):1562S–6S.
3. Heaney, RP. *Am J Clin Nutr* 2008;87(suppl):1567S–70S