



June 30, 2014

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Filed electronically at:

www.health.gov/dietaryguidelines/dga2015/comments/writeComments.aspx

RE: Comments in support of practical Dietary Guidance: Reinforcing core tenets of Dietary Guidelines for Americans – balance, variety and moderation

Dear Dr. Olson and Ms. Rihane:

Thank you for the opportunity to provide comments for the 2015 edition of the Dietary Guidelines for Americans (DGA). We appreciate the Dietary Guidelines Advisory Committee's (DGAC) efforts as the DGA are a vital public service to Americans and provide an evidence-based foundation for federal nutrition policy and nutrition education activities.

The DGA are intended to encourage Americans to focus on eating a healthful diet — one that focuses on foods and beverages that help achieve and maintain a healthy weight, promote health, and prevent disease.¹ Despite 35 years of dietary guidance, Americans still remain slow to change long-held eating habits.² The stubborn gap between recommendations and compliance is likely the result of a constellation of cultural forces, societal norms, family influences, personal long-standing food preferences, changes in meal patterns, food availability, advertising, and a lack of an understanding of how to translate dietary guidance into realistic and permanent lifestyle behaviors, among other factors.^{2,3,4}

¹U.S. Department of Agriculture and U.S. Department of Health and Human Services. Dietary Guidelines for Americans, 2010. 7th Edition, Washington, DC: U.S. Government Printing Office, December 2010.

² Bier D, Derelian D, German J, Katz D, Pate R, Thompson K. Improving compliance with dietary recommendations. *Nutr Today*. 2008;43:180–187.

³ Rowe S, Alexander N, Almeida N, Black R, Burns R, Bush L, Crawford P, Keim N, Kris-Etherton P, Weaver C. Food science challenge: Translating the Dietary Guidelines for Americans to bring about real behavior change. *J Food Sci*. 2011;76:R29–R37.

⁴ International Food Information Council Foundation. 2012 Food & Health Survey. Accessed April 17, 2014. Available at

http://www.foodinsight.org/Resources/Detail.aspx?topic=2012_Food_Health_Survey_Consumer_Attitudes_toward_Food_Safety_Nutrition_and_Health.

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Americans have a wide variety of lifestyles which incorporate a wide variety of foods. Dietary guidance must take this diversity into account and consider how to encourage an overall balanced diet approach with recommendations on “how to” implement guidance that reflect these differences. The Academy of Nutrition and Dietetics embodies this approach. In its position on a total diet approach to healthy eating, the Academy states:

“...that the total diet or overall pattern of food eaten is the most important focus of healthy eating. All foods can fit within this pattern if consumed in moderation with appropriate portion size and combined with physical activity. The Academy strives to communicate healthy eating messages that emphasize a balance of food and beverages within energy needs, rather than any one food or meal.”⁵

Practical and Achievable Guidance Can Help Meet Dietary Recommendations

The premise behind the DGA is to improve Americans’ diets and reduce the incidence of obesity and other diet-related diseases and conditions. Unfortunately, many Americans find current dietary guidance confusing and frustrating.⁶ According to the International Food and Information Council’s (IFIC) 2012 Food & Health Survey, 52 percent of those polled found it easier to do their taxes than how to eat healthfully.⁴ Part of that frustration and the resulting resistance may come from recommendations that are too different from how consumers live today. Indeed, the U.S. Department of Agriculture (USDA) itself found that consumers prefer messages that are realistic and take into account small step approaches. In the Executive Summary of Formative Research conducted by USDA during the development of the 2010 Dietary Guidelines for Americans Consumer Messages and New Food Icon, the agency confirms that “consumers preferred specific, directive messages about ‘easy shift’ behaviors.”

- “Many participants remarked that their busy schedules would only accommodate small changes that require less preparation time and effort to incorporate.”
- “In other words, participants preferred messages with a focus on small, realistic and palatable actions they could pinpoint and take to change their current eating behaviors.”⁷

New recommendations should build on previous language, such as that used by USDA including: “Be Realistic: Make small changes over time in what you eat and the level of activity you do. After all, small steps often work better than giant leaps.”⁸

The MyPlate initiative has done a good job of developing messages and practical tips for leading a healthy lifestyle. Its “Ten Tips Nutrition Education Series” has more than two dozen, easy-to-follow tips that provide consumers with ideas and a starting point to make small, achievable changes toward a healthy diet. From eating on a budget to celebrations, these resources translate dietary guidance for the wide variety of Americans’ lifestyles and habits.⁹

⁵ Position of the Academy of Nutrition and Dietetics: Total diet approach to healthy eating. *J Acad Nutr Diet.* 2013;113:307-317.

⁶ Nagler R. Adverse outcomes associated with media exposure to contradictory nutrition messages. *J Health Comm* 2014;19:24-40.

⁷ United States Department of Agriculture. Development of 2010 Dietary Guidelines for Americans consumer messages and new food icon: executive summary of formative research. Accessed June 11, 2014. Available at <http://www.choosemyplate.gov/food-groups/downloads/MyPlate/ExecutiveSummaryOfFormativeResearch.pdf>.

⁸ United States Department of Agriculture. Your personal path to health: steps to a healthier you. Accessed June 12, 2014. Available at <http://www.choosemyplate.gov/food-groups/downloads/resource/MyPyramidBrochurebyIFIC.pdf>.

⁹ United States Department of Agriculture. Ten tips nutrition education series. Accessed June 11, 2014. Available at <http://www.choosemyplate.gov/healthy-eating-tips/ten-tips.html>.

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These “tips” consider balance, variety and moderation and focus on small changes to achieve better health. A small-changes framework, aimed at helping people make conscious small changes in lifestyle behaviors, in combination with efforts by the private sector to gradually ‘ratchet down’ some of the environmental factors that have contributed to excessive energy intake and the declining rates of physical activity, can be successful in reducing obesity rates.¹⁰ Attaining small changes, while still incorporating the foods one enjoys, in lifestyle could inspire people to make additional small changes, potentially leading to an even greater effect. Setting unachievable dietary recommendations only sets the public up for an “all or nothing” approach that ultimately ends in failure and undesirable health outcomes.

Consumers Prefer Balanced, Practical Dietary Guidance to Educate Them on How to Choose a Healthy Diet

Furthermore, dietary recommendations need to be well-defined. Prescriptive dietary guidance can be confusing and frustrating,^{4,6,11} but moreover, consumers do not want to be overly constrained.¹² In the end, the majority of U.S. adults would rather rely on their own knowledge, experience and common sense to balance their food choices.¹³

Additionally, by providing children with options and choices, healthy behaviors and decisions are more easily attainable. According to David Just and Brian Wansink of Cornell University, choice is important to children, and having the ability to choose can have profound effects on their behavior. For example, their research at Cornell shows that when given the choice of either carrots or celery, 89 percent of children will choose and eat carrots. But if instead they are given only carrots without a choice, just 69 percent will eat them. Instead of taking away choice, a better solution is to guide choice.¹⁴ At the other end of the age spectrum, restrictive diets seem to be less effective in promoting health in the elderly¹⁵ and may translate into deficiencies. Rather, a balanced diet, integrating the concept of enjoyment, which naturally involves personal choice, is recommended for older individuals.

Today’s Consumers Agree: Balance and Personal Choice is Paramount

Americans do not want a restrictive approach to dietary guidance; they want to retain the right to choose which foods they eat. In February and March of 2014 the American Meat Institute (AMI) commissioned a survey¹³ in two waves using Toluna’s On-Line Omnibus. Survey results showed that the vast majority of Americans feel that dietary choices and their own weight are the responsibility of individual adults and parents. Of those surveyed, 90 percent prefer a balanced approach to healthy eating rather than a restrictive one. For most Americans the number one influencers of healthy food selections are personal preference, nutrition labeling information, and guidance by health professionals. It is not surprising then that U.S. adults show a preference for

¹⁰ Hill J. Can small-changes approach help address the obesity epidemic? A report of the Joint Task Force of the American Society of Nutrition, Institute of Food Technologists, and International Food Information Council. *Am J Clin Nutr.* 2009; 89: 477-484.

¹¹ White Paper on Restrictive vs. Balanced Approaches to Dietary Guidance. Conducted for the American Meat Institute (AMI), 2014.

¹² Gollust S, Barry C, Niederdeppe J. Americans’ opinions about policies to reduce consumption of sugar-sweetened beverages. *Prev Med* 2014;11:52–57.

¹³ American Meat Institute. Back to Balance Survey results. Conducted using Toluna’s On-line Omnibus. Interviews completed February 19–21, 2014, and March 18-20, 2014. The total sample in February was conducted among 2,039 adults, including 633 receiving food assistance; and in March the same pool was contacted resulting in responses from 2,012 adults (of whom 578 receive food assistance). The two samples were representative of the U.S. adult population and balanced among age, sex, and geographical region.

¹⁴ Just D, Wansink B. School nutrition: A kid’s right to choose. *Los Angeles Times*, February 3, 2012.

<http://articles.latimes.com/2012/feb/03/food/la-oe-just-wansink-a-better-approach-to-healthy-fo-20120203>

¹⁵ Darmon P, Kaiser M, Bauer J, Sieber C, Pichard C. Restrictive diets in the elderly: never say never again? *Clin Nutr* 2010;29:170–174.

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more information that enables personal responsibility and less government intervention in the process of following a healthy diet.

Reinforcing Core Tenets of Dietary Guidelines for Americans: Balance, Variety and Moderation

Polls and surveys of adults and research in children demonstrate that consumers resist following prescriptive dietary advice that tells them what they should and shouldn't eat. Consumers are confused by what they perceive to be conflicting dietary advice, and would rather use their own best judgment in making decisions about what to eat and what to avoid or limit. They object even more to attempts to control their eating behavior by taxing unhealthy foods or banning them outright.

A core tenet of the DGA is balance, variety and moderation. Placing a heavier focus on consumer behavior education that includes economic and cultural considerations to help guide the consumer on what nutrient dense food choices to make versus not to make, and focusing on portion guidance to provide "how to" practical advice will better support Americans in achieving and maintaining a healthy weight, improve health, and prevent disease.

We appreciate your consideration of this information as you evaluate recommendations for the DGA 2015. Making the dietary guidelines practical, affordable and attainable will help Americans be better equipped to follow recommendations, make better choices, and achieve balance for overall health.

Sincerely,

American Association of Meat Processors
American Frozen Food Institute
American Meat Institute
Can Manufacturers Institute
National Confectioners Association
National Chicken Council
National Pork Producers Council
National Turkey Federation
North American Meat Association
Shelf-Stable Food Processors Association

American Association of Meat Processors

The American Association of Meat Processors is North America's largest meat trade organization. AAMP represents over 1200 medium and small meat processors from across the U.S., Canada and several foreign countries. AAMP members have been bringing safe wholesome foods to America's tables since 1939.

American Frozen Food Institute

The American Frozen Food Institute is the national trade association promoting and representing the interests of all segments of the frozen food industry. AFFI works to foster industry development and growth, and advocates before legislative and regulatory entities on the industry's behalf. More information can be found at www.affi.org.

American Meat Institute

The American Meat Institute (AMI) is the nation's oldest and largest meat packing and processing industry trade association. AMI members harvest and process more than 90 percent of the nation's beef, pork, lamb, veal, and a majority of the turkey produced in the United States.

Can Manufacturers Institute

Can Manufacturers Institute (CMI) is the national trade association of the metal can manufacturing industry and its suppliers in the United States. The can industry accounts for the annual domestic production of approximately 124 billion food, beverage and other metal cans; which employs more than 28,000 people with plants in 33 states, Puerto Rico and American Samoa; and generates about \$17.8 billion in direct economic activity. Our members are committed to providing safe, nutritious and refreshing canned food and beverages to consumers.

National Confectioners Association

The National Confectioners Association is the not-for-profit trade association of the confectionery industry. NCA represents over 400 companies that manufacture chocolate, confectionery, and gum products in the United States and another 250 companies that supply those manufacturers. The majority of our manufacturing members are small and medium-sized companies. NCA is committed to science-based evidence and educational resources that convey the role of candy as a treat in a healthy lifestyle.

National Chicken Council

The National Chicken Council (NCC) represents integrated chicken producer-processors, the companies that produce and process chickens. Member companies of NCC account for more than 95 percent of the chicken sold in the United States.

National Pork Producers Council (NPPC)

NPPC is the global voice for the U.S. pork industry, protecting the livelihoods of America's 67,000 pork producers, who abide by ethical principles in caring for their animals, in protecting the environment and public health and in providing safe, wholesome, nutritious pork products to consumers worldwide.

National Turkey Federation

National Turkey Federation (NTF) represents nearly 100 percent of all turkey processors, growers, breeders, hatchery owners and allied companies. It is the only national trade association representing the turkey industry exclusively.

North American Meat Association

With representatives in the United States, Canada and Mexico, and a community of more than 600 companies, North American Meat Association provides its members exceptional regulatory advocacy, educational opportunities, and a spirit of partnership that is unique in the industry.

Shelf-Stable Food Processors Association

The Shelf-Stable Food Processors Association (SFPA) is the trade association serving the interests of shelf-stable prepared food industry and their suppliers on issues affecting the industry.