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SUBMITTED ELECTRONICALLY

December 30, 2014

Designated Federal Officer, 2015 DGAC
Richard D. Olson, M.D., M.P.H.
Office of Disease Prevention and Health Promotion
OASH/HHS
1101 Wootton Parkway
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Angie Tagtow, M.S., R.D.,
Executive Director, Nutrition Guidance and Analysis Division
Center for Nutrition Policy and Promotion
U.S. Department of Agriculture
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

RE: Comments to Dietary Guidelines Advisory Committee Regarding the Removal of Lean Meat as a Component of a Dietary Pattern Associated with Positive Health Outcomes

Dear Dr. Olson and Ms. Tagtow:

The National Chicken Council (NCC) appreciates the opportunity to comment on the Dietary Guidelines Advisory Committee (DGAC) removal of lean meat as a component of a diet pattern associated with positive health outcomes. NCC represents vertically integrated companies that produce and process more than 95 percent of the chicken marketed in the United States. NCC and our members are committed to providing a safe, wholesome, and abundant supply of poultry products for American consumers.

NCC and our member companies have great concerns around the removal of lean meat as a component of a healthy eating pattern, and believe it will likely have unintended negative consequences to Americans' diets.

Meat and poultry products play an important role in a healthy, well-balanced diet. Including meat and poultry in the diet allows consumers to more easily fulfill their nutrient requirements by providing abundant essential amino acids and macronutrients. We recommend that DGAC provides information around portion control and how to choose healthier products as opposed to picking winners and losers in the food pyramid by restricting or completely eliminating nutrient-dense foods such as fresh and processed chicken.

It is equally as concerning that the DGAC would pick food production systems for U.S. consumers while, in reality, various food production systems have developed over time to provide

consumers with variety and choice in the marketplace. We firmly believe that meat and poultry play an important role in a healthy, well-balanced diet and respectfully request the DGAC revisit this area and support the inclusion of such a valuable protein source such as chicken and other lean meats back into its recommendations.

As you know, over the past year, the DGAC Subcommittee 2 has examined the common characteristics of dietary patterns associated with positive health incomes. Throughout the DGAC deliberations, as well as being recognized as nutrient-rich in the *Dietary Guidelines for Americans, 2010*, lean meat was considered a component of a dietary pattern associated with positive health outcomes. That fact changed during a lunch meeting on December 15, when Subcommittee 2 removed “lean meat” from the recommended dietary pattern the U.S. population should consume. This omission implies the DGAC believes no nutritional value exists for lean meat and no scientific evidence supports its inclusion in the American diet. We find it difficult to fathom that after two years of deliberation, the DGAC Subcommittee never made recommendations to remove lean meat but in a little over an hour, lean meat was excluded and the rationale behind its omission remains unknown to the public. It is postulated that one reason that “lean meats” were removed was because the subcommittee could not define “lean meats.” A definition of “lean” already exists. According to the USDA’s Food Safety and Inspection Service, “lean” is defined as 100 grams of individual food with less than 10 grams of fat, 4.5 grams or less of saturated fat, and less than 95 milligrams of cholesterol.¹ Specifically regarding chicken, grilled, skinless, boneless chicken breast (3.5 ounces) has 30 grams of protein, and 3 grams of fat of which less than 1 gram is saturated fat.² This falls well below the FSIS definition of “lean.” This lean definition would also include many other meat and poultry products, including processed meats.

A total diet approach allows the inclusion of all foods, including meat and poultry, while emphasizing the importance of a varied and balanced diet within calorie needs. In 2013, the Academy of Nutrition and Dietetics endorsed this total diet approach as the most important focus of a healthful eating style. By identifying lean meat as a category of foods to ignore, consumers may perceive lean meat as “bad foods,” which is inconsistent with the scientific evidence and the total diet approach.³

Ignoring the importance of lean meat in the diet of most Americans may have unintended consequence, specifically substituting lean meat for less nutrient-rich foods. It is frequently discussed during deliberations that recommendations to eat a low fat diet led in part to over-consumption of other food components; Americans merely replaced one over-consumed dietary component with another. Instead, the American public would be well served with dietary guidance that provides strategies to help consumers in achieving their healthy diet within their lifestyle constraints.

Chicken producers are committed to providing safe, wholesome, and diverse nutritious products to consumers so they can make educated decisions in choosing the foods that best fit their personal lifestyle and family needs. These products include fresh, lean, and processed chicken products.

¹ USDA-FSIS-OPPED-LCPS. 2007. A guide to federal food labeling requirements for meat, poultry, and egg products. http://www.fsis.usda.gov/shared/PDF/Labeling_Requirements_Guide.pdf.

² National Nutrient Database for Standard Reference, Release 27.

³ Academy of Nutrition and Dietetics. 2013. AND Position. Total Diet Approach to Communicating Food and Nutrition Information. *J Acad Nutr Diet.* 2013;113:307-317.

In summary, chicken and other lean meats are an integral part of the American diet and the absence of recognition by the DGAC of the role of lean meat as a component of a healthy eating pattern is of great concern. The Committee's decision to omit "lean meats" in a healthy pattern due to lack of definition of "lean meat" amidst rushed deliberations questions the validity of the omission. It also casts an astonishing lack of discernment in reviewing scientific evidence and again calls into question the entirety of the recommendations submitted by the DGAC to the agencies.

We encourage the agencies to include chicken and other lean meats as a component of a healthy eating pattern. Reducing or limiting nutrient-rich, lean meats and increasing nutrient-poor foods could be an unintended consequence of the advice that does not acknowledge the nutritional value of lean meats.

Thank you for this opportunity and please do not hesitate to contact me if I may be of further assistance. Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ashley B. Peterson". The signature is fluid and cursive, with the first name being the most prominent.

Ashley B. Peterson, Ph.D.
Vice President, Scientific and Regulatory Affairs
National Chicken Council

cc: The Honorable Sylvia Mathews Burwell, Secretary of Health and Human Services
The Honorable Tom Vilsack, Secretary of Agriculture
The Honorable Dr. Karen DeSalvo, Acting Assistant Secretary for Health, U.S.
Department of Health and Human Services
The Honorable Kevin Concannon, Under Secretary, Food, Nutrition, and Consumer
Services, U.S. Department of Agriculture