



American Bakers Association

Serving the Baking Industry Since 1897

Comments on 2020 Dietary Guidelines Review Process
November 28, 2017

Good afternoon, my name is Mike Goscinski, I am Director of Government Relations for the American Bakers Association. Thank you for the opportunity to respond to your request for comments regarding the 2020 Dietary Guidelines for Americans process review. ABA supports the Trump Administration's priority to focus on policy that is transparent, data driven, and science-based, and applauds its willingness to work with all stakeholders.

These comments are submitted on behalf of the members of the American Bakers Association (ABA). ABA is the Washington D.C.-based voice of the wholesale baking industry. Since 1897, ABA has represented the interests of bakers before the U.S. Congress, federal agencies, and international regulatory authorities. ABA advocates on behalf of more than 1,000 baking facilities and baking company suppliers. ABA members produce bread, rolls, cookies, crackers, bagels, sweet goods, tortillas and many other wholesome, nutritious, baked products for America's families. The baking industry generates more than \$153 billion in economic activity annually and employs more than 799,500 highly skilled people.

ABA believes the US Dietary Guidelines can further promote chronic disease prevention and ensure nutritional sufficiency by recognizing the critical importance of folic acid enrichment and by including comprehensive and robust information on the health benefits of both enriched and whole grains.

The Dietary Guidelines for Americans (DGA) serve as the foundation for all U.S. food and nutrition policies and programs. Its fundamental purpose is to assist Americans in making healthful food choices. Unfortunately, in many respects, the DGA may not be accomplishing this purpose because it appears that certain diet-related chronic diseases and rates of obesity have increased since the process began. This may, in part, be due to the challenges in trying to create recommendations directed at health outcomes that must also be able to be implemented in practical settings, accepted by consumers, translated into food reformulations, and support the realities of food nutrition policies.

It is essential that the expertise represented on the Dietary Guidelines Advisory Committee (DGAC) – the Committee responsible for drafting the report upon which the DGA are based – include expertise not only in health outcomes and chronic disease but also expertise in understanding the practical implications and implementation of prospective recommendations. For example, dietitians with expertise in using dietary recommendations in practical applications, human behavior experts who can assess consumer acceptance of prospective recommendations, food scientists and other technical experts with expertise in translating dietary recommendations in various settings including food

formulations, restaurant food, home cooking, and school meal planning, and other expertise so that the DGA is able to accomplish its goal of assisting Americans in consuming healthful foods.

Per ABA's previous comments during the National Academies of Science (NAS) process review, ABA noted that the DGA may be failing to achieve its purpose in part because of a lack of a variety of expertise on the DGAC. ABA believes that prospective DGAC members should include experts in (at least) fields of Food Science and Food Technology (including food supply chain expertise), Basic Nutrition Research, Applied Nutrition Research (including consumer research, nutrition education and behavior change), Public Health/Health Sciences (HCPs, epidemiologists, pediatricians and other infant and toddler experts to address the added element of B-24), Regulatory, and Study Design (systematic scientific review). ABA also believes that prospective committee members should be selected from a cross-section of relevant professions, including (but not limited to) academia, practicing health care professionals, industry, and NGOs. ABA recommends that these same principles – a variety of experts from a variety of settings – should be applied when creating DGAC subcommittees. Finally, given the practical realities of managing such a large committee with subcommittees, the chair of the DGAC should have management expertise in addition to subject matter expertise.

ABA supports the recommendations of both of NAS's HMD reports and the five values identified to improve the integrity of the process. Further, regarding the second report, **Redesigning the Process for Establishing the Dietary Guidelines for Americans**, which divides the tasks and responsibilities into smaller working groups and panels to support the DGAC. This approach lends itself to a more thoughtful and robust dialogue that can result in a more balanced, unbiased, and scientifically grounded set of recommendations to support public health.

ABA shares the NAS's HMD recommendations regarding the need to minimize conflicts of interest and bias and believes that such issues exist even within academia. ABA strongly believes that transparency is needed during the DGAC selection process, which should mitigate some of these concerns. One option to ensure transparency would be to use the process of public notice and comment during the committee selection process. The notice could provide information on prospective committee members to allow the public to assess whether the DGAC committee is balanced with appropriate expertise and to disclose potential conflicts of interest. To minimize conflicts of interest, committee members could be required to sign a conflict of interest agreement and follow Federal Advisory Committee Act requirements. These same requirements would apply to the subcommittee selection process, so that subcommittees would be subject to the same transparency.

ABA's believes that the two recommendations provided above – (1) that the DGAC have sufficient practical expertise to implement, achieve, and ensure consumer acceptance of the DGA, and (2) that the DGAC selection process be publicly transparent – are the most important things the Committee could recommend improving the DGAC selection process.

Thank you again for the opportunity to provide comments today on behalf of the American Bakers Association. Should there be any questions or if additional information is needed, please contact Lee Sanders, SVP, Govt. Relations & Public Affairs at LSanders@americanbakers.org or Mike Goscinski, Government Relations Director at mgoscinski@americanbakers.org.