



GMA Oral Comments

Introduction

- The Grocery Manufacturers Association (GMA) represents the majority of food manufacturers. We fully support the development of the Dietary Guidelines for Americans (DGA) to help guide nutrition policies that allow consumers to develop healthier eating patterns.
- We appreciate the huge amount of work contributed by Advisory Groups and U.S. Department of Agriculture (USDA) and the Department of Health and Human Services (HHS) over the past 35 plus years to periodically update the DGA recommendations based upon new science.
- We also appreciate efforts by the Departments to assure that the DGA have a solid scientific basis; one such effort being the creation of the Nutrition Evidence Library (NEL). However, in view of the proliferation of popular, weakly-supported and often conflicting dietary advice, it is critical to assure that DGA are widely viewed as credible and an authoritative source of dietary recommendations.

Processes for selecting the Advisory Committee

- It is important that appropriate measure be taken to provide transparency around bias, or conflicts of interest¹ that exist on the panel and guarantee balance and representation of a wide range of relevant expertise and perspective on the Dietary Guidelines Advisory Committee (DGAC).
- In order to facilitate the selection of the DGAC panel members, USDA and HHS should first prioritize the detailed topic areas which will be reviewed. The areas of priority can be open for public comment with the finalized list being used to select the best scientific experts to address these identified areas with outside experts being utilized as needed.
- Where there is a lack of quality data in a given area, e.g. impact of diet on short- and long-term health of the birth to 24-month cohort, the DGAC recommendations rely heavily on the judgment of the Committee. In such situations, the balance of expertise and perspective is critical.

¹ Rowe S, et al. How experts are chosen to inform public policy: can the process be improved? Health Policy 2013;112:172-178.

- A broad range of specific subject matter experts is desirable on every DGAC panel, including dietitians/nutritionists, oral health experts, medical experts, biostatisticians and methodologists, food technologists, behaviorists, physiologists, epidemiologists as well as members with industry experience to provide a practical perspective.
- As was recommended by the NAS in the first report, the Departments should make a list of provisional appointees open for public comment – including short biographies and any known conflicts including not only financial but also intellectual biases – for a reasonable period of time prior to appointment. We recommend that the DGAC should be comprised of scientific experts in the finalized topic areas that provide a balance of viewpoints, while minimizing bias to the greatest extent possible.

Methods used to review scientific evidence

- The USDA NEL process is a rigorous methodology that was designed to maximize transparency, minimize bias and ensure systematic reviews are high quality, relevant and timely. As noted in the NAS recommendations from the 2nd report, the secretary of USDA should ensure all NEL systematic reviews align with best practices. Additionally, the secretary of USDA should clearly separate the roles of USDA NEL staff and the DGAC.
- Transparency is important and more clarification is needed on the selection criteria (inclusion and exclusion criteria) for research included in the NEL review process.
- The funding source of scientific research should not be a criterion in assessing the quality of the data. Other elements, such as experimental design and data analysis should be used to assess the quality of scientific research.
- When examining the recommendations for the age group of the birth to 24-month is it important to note the complexity and unique limitations involved in this area of nutrition research when developing balanced guidelines that address the full spectrum of infant and toddler feeding and are also practical for use by new parents, care givers, social workers and others.
- A consistent process and level of evidence should support each nutrient or food based recommendations. For example, the use of modeling is appropriate for evaluating the nutritional adequacy of dietary patterns but should not be used in place of the NEL for establishing recommendations.
- In an effort to provide transparency throughout the entire development process, the secretaries of USDA and HHS should provide the public with a clear explanation when the DGA omit or accept only parts of conclusions from the scientific report and allow for a public notice and comment period prior to the publication of the final DGA policy document.

Closing

- The DGA process has changed significantly – for the benefit of all – over the 35 years of its existence. We are now at a critical point to reassess and improve the DGA process. We are grateful for the opportunity to provide these ideas and to the USDA for their efforts to continuously improve the DGA development process. Credible, science-based dietary recommendations are an essential element to maintain and improve the health of consumer.