

**National Cattlemen's Beef Association
Comments for 2020 Dietary Guidelines for Americans Listening Session
November 28, 2017**

Thank you for the opportunity to provide input in advance of the Dietary Guidelines Advisory Committee nomination process. The National Cattlemen's Beef Association (NCBA) has a long-standing commitment to supporting nutrition research to better understand how people can enjoy beef as part of a healthy, balanced lifestyle.

NCBA supports the recommendations of the National Academies' Health and Medicine Division (HMD) report. Specifically, we support efforts that call for:

- Greater scientific rigor, using validated, standardized processes and methods, informed by an open peer review process and the best available scientific evidence; and
- Improved transparency, especially to ensure that the Advisory Committee's conclusions are accurately applied in the consumer-facing messages of the Dietary Guidelines for Americans.

We appreciate that applying these recommendations to the 2020 process is no small task and, as such, we encourage you to consider focusing on key areas to address the need for greater scientific rigor and transparency.

- First, USDA should allow public comment on the systematic literature review conducted through the Nutrition Evidence Library (NEL) to consider evidence-based comment on the protocol, research questions, and inclusion and exclusion criteria.
 - For example, the evidence review supporting the B-24 project has not yet provided sufficient opportunity for public comment. Without the ability to submit peer-reviewed evidence or review the research questions, it's unclear if the recommendations will be based on the full body of available data.
- Second, NCBA supports an independent peer review of the systematic literature review process and results, which would enhance transparency and integrity of the process.
 - While systematic literature reviews can be effective for assessing evidence, the reliability of the results can be compromised if the inclusion and exclusion criteria are not consistently applied.
 - It's imperative that the review process accounts for both observational and randomized controlled data to ensure the Committee can address its research questions.
 - In 2015, the Committee appeared to rely heavily on observational evidence where lean meat was not consistently defined and ignored scientific evidence from more than 20 randomized controlled trials (RCTs) that show 4 to 5 ½ ounces of lean red meat can be eaten daily as part of a dietary pattern that promotes good health. Because numerous, high-quality RCTs were excluded, despite meeting the NEL inclusion criteria, lean meat recommendations were not based on the totality of the evidence.

NCBA applauds the commitment by USDA to carry out the recommendations made by the National Academies, and we look forward to submitting scientific evidence for the 2020 Advisory Committee's consideration, to help ensure a transparent, evidence-based and technically rigorous process.