



November 28, 2017

Good Morning Under Secretary Lipps, Deputy Director Haven, and USDA staff,

My name is Jessica Hixson and I am the Director of Government Affairs at SNAC International. SNAC would like to thank the USDA for hosting today's listening session on the importance of the Dietary Guidelines process. SNAC International is the international trade association of the snack industry, representing snack manufacturers, marketers and suppliers. "SNAC" stands for snacking, nutrition, and convenience—three key elements research shows reflect the habits of today's consumer. Founded in 1937, SNAC International represents over 400 companies worldwide.

As USDA initiates the Dietary Guidelines process, SNAC recommends the Agency start by outlining its 2020 priorities. Specifically clarifying the scope and priorities at onset would help avoid concerns that the Committee has ventured outside of nutrition recommendations and ensure appropriate, qualified Committee members are chosen. This will also help SNAC recommend the appropriate Advisory Committee experts and will provide us the opportunity to submit the most helpful research to aid the committee during their review.

SNAC was pleased to review the National Academy of Science, Engineering, and Medicine's thoughtful evaluation of the current Dietary Guidelines process and its specific recommendations for areas of improvement. Particularly we were pleased to see they noted the importance of increased transparency and enhanced scientific rigor throughout their two reports.

SNAC has had concerns as it relates to transparency in the past. Loss of trust occurs when recommendations are made and then changed or removed because seemingly definitive guidance was provided before ensuring adequate and rigorous scientific data was available to make such a decisive conclusion. In particular, SNAC recommends the Agency consider prioritizing review of the benefits of meal and snack time and refrain from making any recommendations around sodium and potassium intake until the National Academies Dietary Reference Intake review is complete.

In regards to increased transparency, SNAC supports the Academies recommendations, which suggest:

- Increased Agency updates to the public throughout the multi-year process and more in-person meetings;
- Better management and notification throughout the Advisory Committee selection process in regards to conflicts of interest, including conflict of interest in advocacy organizations;
- Increased Nutrition Evidence Library (NEL) transparency and public availability so that stakeholders know and understand what will be included or excluded prior to conducting research;
- More opportunities for the public and organizations like SNAC to share feedback through public and written comments.

In regards to enhanced scientific rigor, SNAC supports the Academies recommendations that suggest:

- All science needs to be peer reviewed and NEL process needs to be strengthened according to Cochrane and AHRQ standards;
- Clear separation of the NEL staff and those that draft the scientific recommendations document



- Provide additional technical training for the NEL staff; and
- Improve the advanced systematic review (SR) protocols.

**Thank you for the opportunity to be with you today. SNAC International looks forward to participating in the 2020 Dietary Guidelines Process.**

**Thank you.**