

November 28, 2017

2020 Dietary Guidelines for Americans Listening Session
USDA Whitten Building, 104-A
1400 Independence Avenue SW
Washington, DC 20250

Good Morning.

My name is Sarah Reinhardt, and I am a public health dietitian at the Union of Concerned Scientists (UCS) in Washington, DC. On behalf of our organization, I would like to thank the US Department of Agriculture (USDA) for hosting this listening session.

UCS is a science-based nonprofit working for a healthy environment and a safer world. Our organization combines independent scientific research and citizen action to develop innovative, practical solutions and secure responsible changes in government policy, corporate practices, and consumer choices.

The Dietary Guidelines for Americans (DGA) play a critical role in providing science-based dietary recommendations to reduce chronic disease risk in the general population and to guide federal nutrition programs serving some of our nation's most vulnerable populations. **It is essential that the process used to develop these guidelines maintains a high degree of integrity, autonomy, and transparency to ensure that the guidelines represent the best available science and are free of bias that may work against the interests of public health.**

Today I'd like to underscore the importance of three key points identified in the National Academies of Sciences, Engineering, and Medicine report, "Redesigning the Process for Establishing the Dietary Guidelines for Americans."

First, we commend the 2015 Dietary Guidelines Advisory Committee (DGAC) for its rigorous evaluation of current nutritional science and resulting dietary recommendations, and support improved methods that could further strengthen future DGAs. Per the National Academies, the methods used to inform the DGA could be improved both by applying external peer review to the systematic reviews conducted by the USDA Nutritional Evidence Library, and by changing the process structure, allowing groups of experts to focus on various functional topics throughout the five-year cycle. This may prove particularly valuable in the development of dietary recommendations for pregnant women, infants, and young children 0-24 months for inclusion in the 2020-2025 DGA.

Second, we support the National Academies' recommendation that the USDA and Department of Health and Human Services (DHHS) increase transparency in the DGA process, including providing the public with a clear explanation when discrepancies exist between the advisory committee report and DGA. The 2015 DGA omitted several key recommendations made by the DGAC; these include recommendations to acknowledge the

relationship between dietary patterns and environmental sustainability and advice to reduce red meat intake in the general population. Analysis of 29,000 public comments on the 2015 advisory committee report revealed that 75 percent of comments expressed support for recommendations linking diet with sustainability. That the criteria used to omit these recommendations from the final guidelines were not clear, and remain unclear, speaks to the critical need for greater transparency and accountability in the translation of the DGAC report to the final guidelines.

Third, we strongly agree that managing biases and conflicts of interests is one of the core aims that should drive the comprehensive redesign of the DGA process. It is essential that potential sources of bias, particularly those that conflict with evidence-based dietary recommendations, are identified and addressed to minimize undue influence on the DGA process. We support the recommendations made by the National Academies to reduce and manage sources of bias, and encourage circumspection around potential conflicts of interest, financial or otherwise, that would work to the detriment of public health.

In conclusion, UCS commends the National Academies for its rigorous review of the DGA process and supports many of the recommendations contained therein. A commitment to independent, evidence-based dietary guidelines and a transparent, unbiased process is imperative, particularly as the USDA and DHHS undertake the development of new guidelines that address the nutritional needs of pregnant women and infants. We trust that the National Academies' findings will be applied to the DGA process to strengthen methodology; increase transparency; and hold committee members and department secretaries alike accountable for applying the best available science to advance public health, not private gain.

Thank you for the opportunity to comment today, and for the thorough and insightful review from the National Academies.