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RE: 2015 Dietary Guidelines Advisory Committee Public Comments

The International Food Information Council (IFIC) and IFIC Foundation appreciate the opportunity to submit comments to the 2015 Dietary Guidelines Advisory Committee (DGAC). Our ensuing comments are constructed with the 2010 DGAC “Needs for Future Research” in mind. We believe our years of consumer research and related peer-reviewed articles will be of great value to the DGAC in supporting innovative ways to motivate the American public toward more healthful lifestyles and behaviors.

IFIC and IFIC Foundation are nonprofit organizations based in Washington, DC. The mission of IFIC is to effectively communicate science-based information about food safety and nutrition to health professionals, government officials, educators, journalists, and consumers. The mission of the IFIC Foundation is to effectively communicate science-based information about health, nutrition and food safety for the public good. Both IFIC and the IFIC Foundation receive primary funding from food, beverage and agricultural companies that support our missions. We also receive government grants and contributions from other individuals, foundations and associations.

IFIC and IFIC Foundation consumer research has been exploring Americans’ attitudes toward nutrition and health for more than two decades with our signature research project being the annual IFIC Foundation Food & Health Survey. We are dedicated to providing consumers with clear, accurate advice and actionable tips on how science-based information related to nutrition, health, and food safety can be applied to their daily lives.

CARBOHYDRATES

RESEARCH NEEDS ADDRESSED:

The 2010 DGAC identified the following research needs related to carbohydrates:

1. Develop standardized assessment tools to determine accurate intake of added sugars.
2. Explore mechanisms and explanations for observed effects of carbohydrates on health.
Addressing obesity trends is a critical step to improving the health of the American public. Our focus is helping Americans make informed choices that lead to a healthful and balanced lifestyle. When too much emphasis is placed on one food, nutrient, or ingredient, the importance of eating an overall balanced diet with the appropriate number of calories often gets overlooked.

Because carbohydrates and sugars are ingredients in many popular foods, it may be logical to suspect that sugars have a unique role in obesity. However, this is not the case. Available scientific evidence to date shows no direct connection between total sugar intake and obesity. The root cause of obesity is an extremely complicated question—it involves many social, genetic, and environmental factors that are likely very different for each individual. Nutrition experts agree that reducing caloric intake is essential to addressing obesity trends.

Consumers are inundated with nutrition information from a variety of sources and the opportunity for misinformation to spread is more prevalent than ever before. IFIC Foundation consumer research shows a growing percentage of consumers believe that calories from carbohydrates and sugars are the most likely calorie source to cause weight gain (40% in 2013 vs. 20% in 2011). In comparison, in 2013 30% agreed with the statement, “Calories from all sources have the same impact on weight gain.”

It’s of critical importance that accurate, science-based information regarding intake levels of carbohydrates and sugars and direct health outcomes are communicated to the public in a way that increases nutrition knowledge and awareness, aids and motivates healthful choices, and minimizes confusion.

**FOR NUTRITION EVIDENCE LIBRARY (NEL) CONSIDERATION:**


**Description:** The IFIC Foundation four-part article series explores the role of sugars in the diet and our health. Part 1 examines the various types of sugars, functionality in foods, and terminology. Part 2 examines the association between sugars and indices of dietary quality as well as dietary recommendations for sugar. Part 3 explores associations between intake of sugars and obesity and chronic diseases and cardiovascular disease. Part 4 reviews the association between sugars and dental health, between sugars and cognitive function, and between sugars and physical activity.

**KEY POINTS:**

- Communications regarding definitions of various sugars, role of sugars in our food and health, and methods used to measure sugar consumption would be enhanced among regulators, scientists, manufacturers, health professionals, and consumers if commonly accepted definitions were harmonized.
- Fructose-containing sweeteners have been studied by several expert groups; the metabolic effects of pure fructose and high fructose corn syrup are quite different.
- More research that reflects common human consumption patterns of fructose is needed.
- Between 1999 and 2008, NHANES data show the consumption of added sugars decreased by 24%, from 100.1 to 76.7 grams/day despite an increase in incidence of obesity.
According to 2003-2006 NHANES data, more than 87% of the US population had intakes of added sugars between 0 and 25% of total energy intake (IOM’s suggested maximum). Regardless of intake of added sugars, few individuals in the population meet recommended nutrient intakes.

Low levels of sugars intake does not guarantee than an individual meets dietary guidelines. Similarly, eating a diet high in sugars does not guarantee a poor individual diet.

For individual recommendations on intake of added sugars, dietetics professionals should assess food intake within the context of the entire diet and consider personal health and nutrition goals.

As calories required for weight maintenance decrease, consuming nutrient-dense carbohydrate sources becomes more critical if energy balance and nutrient needs are to be achieved simultaneously.

Fundamentally, concerns are not about consumption of sugars per se but about overconsumption of sugars, which can be a problem with any food or nutrient.

Available data show no direct link between moderate consumption of sugars and chronic diseases or obesity.

KEY POINTS FROM IFIC FOUNDATION 2013 FOOD AND HEALTH SURVEY:

- Half or more of Americans try to limit their consumption of sugars in general or high-fructose corn syrup specifically.
- Top reason for considering sugars/carbohydrates when choosing foods is to maintain a healthy weight.
- Eight in ten consumers know fructose can be found in beverages. But only half recognize that fructose is found in fruit.
- More than eight in ten consumers believe that moderate amounts of sugar can be part of a healthful diet.
- Seven in ten believe people with diabetes can include sugar in their diet.
- Half of Americans recognize benefits of low-calorie sweeteners for people with diabetes, in reducing the calorie content of foods, and in weight management.
- For those Americans who consume low-calorie sweeteners, reducing total calories is the most common reason.

KEY POINTS FROM OTHER IFIC FOUNDATION FOOD & HEALTH SURVEY RESEARCH INCLUDE:

- Since 2008, consumers have become increasingly concerned about the amount and type of sugar they eat. Since 2008, consumers have become increasingly concerned about the amount and type of sugar they eat. In the IFIC Foundation 2010 Food & Health Survey, the majority of respondents reported trying to consume less sugar (70%) and less high fructose corn syrup (63%) and a declining number of Americans believed that moderate amounts of sugar could be part of an overall healthful diet (58%, 2010 vs. 71%, 2008).

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