



The Dannon Company, Inc.  
100 Hillside Avenue, White Plains, NY 10603

Comments to the Dietary Guidelines Advisory Committee  
March 10, 2014

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On behalf of the Dannon Company, we thank you for the opportunity to submit comments to the 2015 Dietary Guidelines Advisory Committee (DGAC). As a leading yogurt manufacturer for over 70 years, we are committed to bring health through food and appreciate the important work of the DGAC.

We believe that Americans' health can benefit from consuming one nonfat or lowfat yogurt every day and we submit the following key scientific research for your consideration.

#### Nutrients of Concern

It is important to recognize that yogurt can help Americans consume more calcium, potassium and vitamin D, three of the 2010 DGA's nutrients of concern. Consuming one yogurt every day is a practical, specific and easily achievable recommendation which would help close the gap on shortfall nutrients and help improve diet quality and health.

Also, many nonfat and lowfat yogurts provide approximately 25% more potassium than an equal 8-ounce serving of milk.<sup>1</sup> Finally, consuming a single 8-ounce serving of nonfat or lowfat yogurt every day would provide the average adult American with approximately 35-42% of their daily recommended value for calcium, based on the Dietary Guidelines for Americans 2010.<sup>2</sup>

Additionally, recent research shows that compared to non-consumers, yogurt consumers are not only likely to have higher potassium intakes, but are less likely to have inadequate intakes of vitamins B2 and B12, calcium, magnesium and zinc.<sup>3</sup>

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<sup>1</sup> U.S. Department of Agriculture. National Nutrient Database for Standard Reference Release 26. Accessed 23 August 2013. <http://ndb.nal.usda.gov/ndb/search/list>.

<sup>2</sup> U.S. Department of Agriculture and U.S. Department of Health and Human Services. Dietary Guidelines for Americans, 2010. 7th Edition, Washington, DC: U.S. Government Printing Office, December 2010.

<sup>3</sup> Wang H, Livingston KA, Fox CS, Meigs JB, and Jacques PF. Yogurt consumption is associated with better diet quality and metabolic profile in American men and women. *Nutrition Research*, January 2013;33(1):18-26.

## Helping Consumers Meet Dietary Guidelines for Dairy

Considering that most Americans do not eat the 2010 DGA's recommended three servings of nonfat or lowfat dairy a day, yogurt can help Americans achieve this target. While there may be a perception that yogurt is widely consumed, fueled in part by the recent popularity of Greek yogurt, the reality is that 90% of Americans eat **one cup or less of yogurt per week**.

Adding to their current diet a single 8-ounce serving of nonfat or lowfat yogurt every day would help increase the average adult American's consumption of dairy products from 52% of the current recommendation to 85% based on the Dietary Guidelines for Americans 2010.

To conclude on dietary patterns, it is important to note that dietary diversity within the dairy group has been found to be responsible for the strongest increase in overall dietary adequacy and dietary balance.<sup>4 5</sup> Similarly, the USDA just announced last month changes to the WIC program, to provide a wider range of nutritious foods for mothers and their young children, including yogurt.

## Lactose Intolerance

The National Institutes of Health identified self-restriction of dairy foods, associated with self-diagnosis of lactose intolerance, as a public health problem.<sup>6</sup> For those who are lactose intolerant, milk avoidance is a major obstacle in obtaining adequate calcium and vitamin D from the diet,<sup>7</sup> and it has been shown that avoiding dairy may lead to shortfalls of essential nutrients.<sup>8</sup>

The prevalence of lactose intolerance in the U.S. varies among ethnic groups. Research shows that currently 20.1 % of African Americans, 8.8% of Hispanics and 7.8% of non-Hispanic whites consider themselves to be lactose intolerant. As U.S. demographics continue to evolve – by 2060 African Americans and Hispanics will constitute approximately 14.7% and 31% of the population respectively – the prevalence of lactose intolerance is also expected to increase.<sup>9 10</sup>

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<sup>4</sup> Vandevijvere S, De Vriese S, Huybrechts I, Moreau M, Van Oyen H. Overall and within-food group diversity are associated with dietary quality in Belgium. *Public Health Nutr* 2010;13:1965–1973.

<sup>5</sup> Dietary variety increases the probability of nutrient adequacy among adults. Foote JA1, Murphy SP, Wilkens LR, Basiotis PP, Carlson A. *J Nutr*. 2004 Jul;134(7):1779-85.

<sup>6</sup> Wilt TJ, Shaikat A, Shamiliyan T, et al. Lactose intolerance and health. *Evid Rep Technol Assess (Full Rep)*. 2010;192:1–410.

<sup>7</sup> Savaiano DA, Boushey CJ, and McCabe GP. Lactose intolerance symptoms assessed by meta-analysis: A grain of truth that leads to exaggeration. *The Journal of Nutrition*, April 2006; 136:1107-13.

<sup>8</sup> Lactose Intolerance and Health Disparities Among African Americans and Hispanic Americans: An Updated Consensus Statement. Bailey RK, Fileti CP, Keith J, Tropez-Sims S, Price W, Allison-Otley SD. *J Natl Med Assoc*. 2013 Summer;105(2):112-27.

<sup>9</sup> Nicklas TA, Qu H, Hughes SO, He M, Wagner SE, Foushee HR and Shewchuk RM. Self-perceived lactose intolerance results in lower intakes of calcium and dairy foods and is associated with hypertension and diabetes in adults. *The American Journal of Clinical Nutrition*, July 2011;94(1):191-8.

<sup>10</sup> U.S. Census Bureau. U.S. Census Bureau Projections Show a Slower Growing, Older, More Diverse Nation a Half Century from Now. 12 December 2012. <http://www.census.gov/newsroom/releases/archives/population/cb12-243.html>.

Lactose intolerance or self–diagnosis of lactose intolerance is one of the reasons Americans do not get 3 servings of dairy every day. Many do not realize that because yogurt is a semi-solid food and contains live and active cultures, it may be easier to digest for those with lactose intolerance.<sup>8</sup> This may be particularly relevant when considering today’s increasingly diverse population.

### Weight Management

Studies have shown that regular yogurt consumption is associated with a healthy weight over time. In particular, Yogurt consumption over time (at 4% of daily calories) is associated with a lower change of annualized weight and waist circumference over time,<sup>11</sup> and consumption of yogurt, fruits, vegetables and whole grains is associated with less weight gain over time, with yogurt having the best effect.<sup>12</sup>

### Blood Glucose Levels

According to the American Diabetes Association, regular or Greek plain nonfat yogurt with little or no added sugar, can be a good choice for people with diabetes.<sup>13</sup>

Additionally, recent research shows that yogurt consumption is associated with healthy levels of circulating glucose within the normal range.<sup>3</sup>

Furthermore, a recent meta-analysis of 14 cohort studies showed that lowfat dairy, lowfat milk, cheese and yogurt consumption were most associated with better glycemic control in a dose-dependent manner. This meta-analysis showed that total dairy intake was associated with better glycemic control in the normal range with a 200g/day consumption. When examining different types of dairy products in relation to fasting glucose, significant positive associations was found with intake of lowfat dairy, lowfat milk, cheese and yogurt, while no association could be established with intake of fullfat dairy as well as total and fullfat milk.<sup>14</sup>

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<sup>11</sup> Wang H, Troy LM, Rogers GT, Fox CS, McKeown NM, Meigs JB, and Jacques PF. Longitudinal association between dairy consumption and changes of body weight and waist circumference: the Framingham Heart Study. *International Journal of Obesity*, May 2013.

<sup>12</sup> Mozaffarian D, Hao T, Rimm EB, Willett WC, and Hu FB. Changes in diet and lifestyle and long-term weight gain in women and men. *The New England Journal of Medicine*, June 2011;364:2392-404.

<sup>13</sup> <http://www.diabetes.org/food-and-fitness/food/what-can-i-eat/making-healthy-food-choices/dairy.html>

<sup>14</sup> Gao D1, Ning N, Wang C, Wang Y, Li Q, Meng Z, Liu Y, Li Q. Dairy products consumption and risk of type 2 diabetes: systematic review and dose-response meta-analysis. *PLoS One*. 2013 Sep 27;8(9):e73965. doi: 10.1371/journal.pone.0073965. eCollection 2013.

## Sugar Reduction in Yogurt

In recognition of the general need to reduce consumption of total sugars, in 2013, Dannon reduced by 25% the total sugar content of our most popular children's product, Danimals Smoothies. Dannon is continuously looking for ways to improve the nutrient density of its products and additional details will be provided to DGAC Subcommittee 2.

## Heart Health and maintenance of normal blood pressure

Recent research shows that yogurt consumption is associated with healthy levels of systolic blood pressure within the normal range.<sup>3</sup> Also, yogurt is a recommended food choice for reducing sodium intake in the Dietary Guidelines for Americans 2010.<sup>11</sup>

In summary, eating nonfat and lowfat dairy products, such as yogurt, helps support heart health as part of a balanced diet.

## Bone Health, Muscle Maintenance, and Tooth Loss in Older Adults

After age 50, muscle mass decreases by about 1–2% per year and can eventually lead to age-associated loss of skeletal muscle mass and function.<sup>15</sup> On average, 5–13% of people aged 60–70 years are affected by this change.<sup>16</sup>

The findings of a recent study suggest an association of higher dairy intake with greater whole body lean mass and better physical performance in older women.<sup>16</sup> Also, among a population of largely middle-aged men and women, higher total dairy, milk and yogurt consumption were associated with higher bone mineral density.<sup>17</sup>

Finally, tooth loss becomes increasingly common with age and can affect food selection, nutritional status and general health.<sup>18</sup> As a semi-solid food, yogurt is an excellent choice for a good source of high-quality protein and calcium for elderly with dentition issues.

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<sup>15</sup> Von Haehling S, Morley J, Anker S. From muscle wasting to sarcopenia and myopenia: update 2012. *J Cachexia Sarcopenia Muscle* 2012;3:213–217.

<sup>16</sup> Radavelli-Bagatini S, Zhu K, Lewis J, Dhaliwal S, Prince R. Association of dairy intake with body composition and physical function in older community-dwelling women. *J Am Acad Nutr Diet* 2013;113: Epub ahead of print.

<sup>17</sup> Sahni S, tucker K, Kiel D, Quach L, Casey V, Hannan M. Milk and yogurt consumption are linked with higher bone mineral density but not with hip fracture: the Framingham Offspring Study. *Arch Osteoporos* 2013;8:119.

<sup>18</sup> Paganini-Hill A, White S, Atchison K. Dental health behaviors, dentition, and mortality in the elderly: The Leisure World Cohort Study. *J Age Res* 2011;ID 156061.

Conclusion

To close, we believe that Americans' health can benefit from consuming **one nonfat or lowfat yogurt every day**.

The growing body of evidence on the benefits of yogurt across age groups published since the last Dietary Guidelines should be considered: Yogurt provides a convenient lowfat nutrient rich protein source; brings critical shortfall nutrients in an easily digestible, lowfat dairy option; and is associated with better diet quality, healthier dietary patterns, and less weight gain over time. We thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink that reads "Philippe Caradec". The signature is written in a cursive, flowing style.

Philippe Caradec  
Vice President, Corporate Affairs  
The Dannon Company