



October 10, 2014

Richard D. Olson, M.D., M.P.H.  
Prevention Science Lead and Designated Federal Officer, 2015 DGAC  
Office of Disease Prevention and Health Promotion, OASH  
U.S. Department of Health and Human Services  
1101 Wootton Parkway, Suite LL100 Tower Building  
Rockville, MD 20852

Angie Tagtow, M.S., R.D.,  
Executive Director, Nutrition Guidance and Analysis Division  
Center for Nutrition Policy and Promotion  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

*Filed electronically at: [www.health.gov/dietaryguidelines/dga2015/comments/writeComments.aspx](http://www.health.gov/dietaryguidelines/dga2015/comments/writeComments.aspx)*

**RE: Comments on for consideration by the 2015 DGAC Added Sugars Working Group**

Dear Dr. Olson and Ms. Tagtow:

The Grocery Manufacturers Association (GMA)<sup>†</sup> respectfully submits comments to the U.S. Department of Health and Human Services (DHHS) and the U.S. Department of Agriculture (USDA) for consideration by the 2015 Dietary Guidelines Advisory Committee (DGAC).

GMA believes dietary guidance recommendations intended to inform policy development and public health interventions must be based on the totality of available scientific evidence. GMA recommends that the 2015 DGAC apply an evidence-based review process for evaluating research concerning nutrient intakes and their relationship to health outcomes, such as obesity. As part of this process, stances of authoritative bodies such as the Academy of Nutrition and Dietetics (AND) and the Institute of Medicine (IOM), as well as the best available evidence must be considered in the development of the Dietary Guidelines.

During the Added Sugars Working Group presentation it was noted that Dr. Barry Popkin was listed as an invited expert asked to present to the working group. Dr. Popkin has an active research program understanding dietary behavior with a focus on eating patterns and trends through the use of epidemiological and longitudinal studies. We encourage the Added Sugars Working Group to consider

inviting additional experts who can provide a clinical research perspective on the topic of added sugars. The addition of this perspective will provide the members of the Working Group with a thorough review of the current literature on added sugars.

Recommendations for additional experts to invited are as follows:

John Sievenpiper MD, PhD  
Consultant Physician  
St. Michael's Hospital  
Phone: (416) 867-7475  
[John.sievenpiper@utoronto.ca](mailto:John.sievenpiper@utoronto.ca)

Joanne L. Slavin, PhD, RD  
Professor  
University of Minnesota  
Department of Food Science and Nutrition  
Phone: (612) 624-7234  
Fax: (612) 625-5272  
[jslavin@umn.edu](mailto:jslavin@umn.edu)

G. Harvey Anderson, Ph.D.  
Professor  
University of Toronto  
Departments of Nutritional Sciences  
Department Physiology Director,  
Program in Food Safety, Nutrition and Regulatory Affairs  
Phone: (416) 978-1832  
[Harvey.anderson@utoronto.ca](mailto:Harvey.anderson@utoronto.ca)

Roger Clemens DrPH  
Adjunct Professor  
University of Southern California  
School of Pharmacy  
Phone: (323) 442-2124  
[Clemens@usc.edu](mailto:Clemens@usc.edu)

Theresa A. Nicklas, DrPH  
Professor of Pediatrics  
Baylor College of Medicine  
Tel: 713-798-7087  
FAX: 713-798-7130  
[tnicklas@bcm.tmc.edu](mailto:tnicklas@bcm.tmc.edu)

Thank you for the opportunity to provide comments. GMA looks forward to regularly participating in the 2015 DGA development process through written comments.

Sincerely,



Leon Bruner, DVM, PhD  
Executive Vice President  
for Scientific and Regulatory Affairs  
and Chief Science Officer  
Grocery Manufacturers Association

CC: Collette Rihane, Center for Nutrition Policy and Promotion, USDA  
Kellie Casavale, Office of Disease Prevention and Health Promotion  
Shanthy A. Bowman, Agricultural Research Service, USDA

---

<sup>‡</sup> Based in Washington, D.C., GMA is the voice of more than 300 leading food, beverage and consumer product companies that sustain and enhance the quality of life for hundreds of millions of people in the United States and around the globe. Founded in 1908, GMA is an active, vocal advocate for its member companies, and a trusted source of information about the industry and the products consumers rely on and enjoy every day. The association and its member companies are committed to meeting the needs of consumers through product innovation, responsible business practices and effective public policy solutions developed through a genuine partnership with policymakers and other stakeholders. In keeping with its founding principles, GMA helps its members produce safe products through a strong and ongoing commitment to scientific research, testing and evaluation and to providing consumers with the products, tools and information they need to achieve a healthy diet and an active lifestyle. The food, beverage and consumer packaged goods industry in the United States generates sales of \$2.1 trillion

---

annually, employs 14 million workers and contributes \$1 trillion in added value to the economy every year.