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RE: Comments for Consideration by 2015 Dietary Guidelines Advisory Committee Members

Dear Dr. Olson and Ms. Tagtow:

On behalf of the more than two million farmers and ranchers who belong to farmer cooperatives, the National Council of Farmer Cooperatives (NCFC) appreciates the opportunity to submit the following comments to the Department of Health and Human Services (HHS) and the U.S. Department of Agriculture (USDA) for consideration by the 2015 Dietary Guidelines Advisory Committee (DGAC).

America's farmer-owned cooperatives provide a comprehensive array of services for their members. These diverse organizations have a large stake in producing, handling, and processing our nation's food supply, and take pride in providing the safest, most abundant, affordable, and nutritious food. As the Advisory Committee finalizes the report to the Secretaries of HHS and USDA, NCFC continues to advocate for policy that is science-based, and as such, promotes the increased consumption of all forms of fruits and vegetables; nuts; milk and milk products; whole grains; and meat. NCFC also urges the Committee to focus its report on the Dietary Guidelines for Americans (DGA) original goal of encouraging Americans to eat healthful diets and avoid making recommendations that are beyond the original scope of the guidelines and do not contribute to the overall health of consumers.

General Comments

Currently, the DGA is over a hundred pages long with nearly 30 recommendations, making it hard for consumers to easily understand what the guidelines promote. NCFC recommends the DGA be clear and succinct so Americans can reap the most benefits from the guidelines and avoid any confusion.

NCFC also strongly encourages a total diet approach. The best way to ensure Americans are achieving a balanced and healthful diet is by promoting moderation rather than singling out certain nutrients or food types. The Guidelines should suggest a varied diet that fits within the recommend calorie range to promote healthy eating.

Fruits, Vegetables, and Nuts

The Dietary Guidelines should give equal consideration to all forms of fruits and vegetables. The Guidelines should be based on the nutritional and health properties of food, which are not distinguishable between fresh, frozen, canned or dried forms of fruits and vegetables. Many of NCFC's members have ongoing research which shows equivalent, and in some cases, increased nutritional benefits of canned, frozen, or dried fruits and vegetables over fresh. Also, frozen, canned and dried fruits and vegetables are often more affordable options than fresh, allowing consumers to stretch their dollars further while still getting the vital nutrients fruits and vegetables offer. NCFC strongly supports maintaining neutrality of form within the Dietary Guidelines, while encouraging increased consumption of fruits and vegetables.

Added Sugar

NCFC believes any dietary recommendation surrounding added sugar must be supported and justified by scientific evidence. Rather than focusing only on whether sugar has been added to a product, total sugar should be what is considered. Many fruit products that contain added sugar also provide additional nutritional benefits over other products with added sugar. Some fruits, in their natural state, have a high acid content and a tart taste, and require sweetening to be palatable. As a result, the current discussions surrounding added sugar would place many fruit-based products at a disadvantage, without consideration of the beneficial nutrients found in them.

Sodium

While NCFC understands the goal of reducing sodium intake, sodium guidelines must be realistic and attainable, taking into account the source of the sodium being consumed. Research shows a reasonable range for sodium intake is between 2,800 and 5,000 milligrams per day, which is notably higher than the current levels cited in the DGA. Currently, the Guidelines point to the Institute of Medicine's (IOM) adequate intake level for ages 9 to 50 years of 1,500 mg per day. The 2015 DGA must take into account the reasonable range stated above to ensure the guidelines are practical and achievable.

Cheese

It is important to point out the key role sodium plays in products such as cheese. While cooperatives have made efforts to reduce sodium and offer a range of product options, there are major challenges associated with reducing salt in cheese. Decreasing sodium in cheese impacts the preservation of the product and its taste. Most importantly there are food safety risk associated with the reduction of salt as the salt helps prevent the growth of pathogenic and spoilage organisms. Furthermore, by reducing sodium other ingredients that consumers often try to limit must be added such as preservatives, bitterness blockers or salt substitutes. NCFC hopes the Committee

will take into account the factors mentioned above, as well as the fact that cheese is a source of critical nutrients when establishing sodium recommendations.

Dairy

Fluid milk and dairy products offer a unique nutrient package that is important to the health of both children and adults alike. Fluid milk and dairy products are important sources of three major nutrients of concern in the American diet: calcium, potassium, and vitamin D. Inadequate consumption of milk and other dairy products remains a serious public health issue. The Guidelines should help individuals understand how they can fulfil their requirements of these important vitamins and minerals through consumption of a variety of dairy products.

Meat

Americans should be encouraged to eat lean cuts of meat as the best, most complete sources of protein. NCFC urges the Committee to refrain from over emphasizing plant-based diets, which could easily be interpreted by consumers as the government supporting or recommending a vegetarian diet. The DGA should recognize the health benefits of protein as building blocks for the body and support the consumption of lean meat as an excellent source of protein.

Sustainability

While NCFC sees real value in promoting sustainable practices, we feel the DGA is not the appropriate median to discuss such practices. Consumers have enough to take into account when trying to maintain a healthy and balanced diet. Including environmental factors will only add confusion and distract from the fundamental purpose of the Guidelines. Additionally, there is no research which shows that sustainably produced products offer greater nutritional benefits than those produced conventionally. Furthermore, the expertise of the Advisory Committee is in nutrition and it should maintain its focus within that area. Congress recently stressed this point as it directed the Committee to maintain its focus on nutrient and dietary recommendations based on sound nutrition science. Similarly, NCFC encourages the Committee to stick with the original focus of the Guidelines to encourage Americans to eat a healthful diet that helps achieve and maintain a healthy weight, promotes health and prevents disease. Since agriculture production practices and environmental factors do not fit within the directive of the DGA, NCFC strongly urges the Committee to avoid its inclusion in the 2015 DGAC report.

Thank you again for the opportunity to submit comments for consideration by the 2015 Dietary Guidelines Advisory Committee (DGAC). We look forward to working with HHS and USDA as the Dietary Guidelines are further developed.

Sincerely,



Chuck Conner
President & CEO