



USDA Listening Session on the Dietary Guidelines for Americans

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Thank you for the opportunity to comment on the *Dietary Guidelines for Americans* and the process by which it has been produced. The *Guidelines* is a critical public health document that establishes nutrition standards for government programs benefiting millions of Americans—and creates a strong, science-based foundation for nutrition advice and education. The *Guidelines* was never intended to prescribe advice to people with specific illnesses, genetic backgrounds, or uncommon metabolic factors. Instead, it serves as population-level advice on *public health*.

To better prevent chronic diseases and ensure nutritional sufficiency, the *Guidelines* should offer clear and understandable advice about which foods—not just nutrients—people should eat more of or less of. However, it's tough to eat a healthful diet when, as *The Lancet* recently editorialized, “companies with a vested interest to provide ultra-processed, energy-dense, nutrient-poor food as cheaply as possible” are marketing super-sized portions of sugar drinks, burgers, pizzas, and other unhealthy foods. Hence, future *Guidelines* should not only provide dietary recommendations, but should also recommend state, local, and federal

policy changes—such as a soda tax or limits on sodium in packaged and restaurant foods—to help counter the food industry’s influence and actually improve the public’s health.

The Committee also should acknowledge that social and economic inequities affect what people eat. In a presentation to the DGAC in 2014, Dr. Michael McGinnis, the executive secretary of the NAM, referred to “social, geographic, racial, and ethnic disparities” as a challenge to the *Guidelines*’ impact. Future *Guidelines* should recommend measures to help overcome the impediments that vulnerable sub-groups face when trying to eat healthy diets.

As for the process used to produce the *Guidelines*, it is crystal clear that the DGAC process was transparent and its members were well-qualified—and I say that although I disagree with parts of the report. As detailed in the public record, the DGAC employed a systematic, pre-determined framework, including the use of the Nutrition Evidence Library, to guide its work. That eliminated bias to the greatest extent possible, while still leaving room for judgement. The meetings of the DGAC and its subcommittees were open to the public, and the public—including industry—had numerous opportunities to comment on tentative conclusions and then the final report.

One improvement in the process would be for the NAM to recommend that USDA and HHS disclose potential conflicts of interest of candidates for the DGAC. Another would be to expand the committee by including experts on such topics as toxicology and the environment.

Finally, we should be candid about the cause of the brouhaha that led Congress to commission an NAM report. The meat industry and others launched a lobbying campaign to discredit the DGAC report, because they didn’t like the science-based advice to eat less

red and processed meat. Their campaign included false and unsubstantiated claims about the DGAC's review of the evidence and the strength of the evidence itself. In fact, the DGAC's procedures were scientifically sound and its conclusions were consistent with those of the World Health Organization, American Heart Association, and other authorities.

In conclusion, I hope that the NAM report will thoroughly vindicate the efforts of the members of the DGAC who served the country well. In the future, though, highly qualified individuals may be more reluctant to so generously donate a great deal of their time if their only compensation is unjustified attacks on their credibility and findings.