



May 8, 2015

Richard D. Olson, M.D., M.P.H.

Designated Federal Officer, 2015 Dietary Guidelines Advisory Committee

Office of Disease Prevention and Health Promotion Office of the Assistant Secretary for Health

U.S. Department of Health and Human Services

1101 Wootton Parkway, Suite LL100 Tower Building Rockville, MD 20852

**Re: Response to Request for Comments on the Dietary Guidelines for Americans, 2015**

Dear Colleague:

On behalf of the Board of Directors of California WIC Association (CWA), I am pleased to have the opportunity to respond to the request for comments on the Scientific Report of the 2015 Dietary Guidelines Advisory Committee (DGAC).

The mission of CWA is "to lead California communities to nourish, educate, support, and empower families in building a healthy future." CWA represents all parties interested in support and improvements to the federal Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), offers training and staff development, public education and advocacy, research and policy analysis, and actively participates in allied public health and nutrition coalitions.

The US Dietary Guidelines are a key policy tool for WIC, since the WIC food packages are designed to achieve the goals laid out by the Guidelines, and WIC nutrition education interventions are also planned to align with these important national objectives. Low-income and busy working WIC families should not only be provided market baskets of healthy food based on the latest scientific research and best evidence, but they should hear the same nutrition and education messages from many sectors about the food and health decisions they make every day for themselves and their young children.

**Summary**

The Report reflects a tremendous contribution to national efforts to review and translate the most recent science in order to improve the dietary intake and prevent diet-related chronic disease in the US population. Contrary to some critical comments in the media, the Report's concern with policy implementation and a broader view of health is consistent with approach taken in earlier iterations.

In this comment letter, we make the following points:

- A) We support the DGAC's use of the socio-ecological model and recognition that individual diet and physical activity are influenced by individual biological, household, community, societal, and cultural factors, as well as public and private policies, systems, and environments.
- B) We strongly support the DGAC's inclusion of specific policy and organizational practice changes that are needed to create healthy environments. The final DGA report should continue to reflect

these science-based changes to our food environment and public policies to support and facilitate Americans making healthier food and beverage choices across the lifespan.

C) We commend the DGAC's recognition of a variety of healthy dietary patterns and the continued emphasis that healthy diets meet nutrient needs with whole foods.

D) We support DGAC's finding that multi-component interventions that use a variety of strategies, including environmental change approaches, are more effective than single-component interventions.

E) We endorse the DGAC's recognition of sustainability as an essential component of federal dietary guidance. We strongly agree that linking health, dietary guidance, and the environment will promote human health and sustainability.

F) We support the DGAC's recommendations to reduce consumption of added sugars, and to incorporate added sugars into the Nutrition Facts label, including a percentage of a Daily Value based on 10 percent of calories or less in a 2,000-calorie diet, and for amounts expressed in teaspoons as well as grams to maximize consumer understanding.

G) We support the development of policies to promote water as the primary beverage of choice. We also support public education and policy changes to encourage access to clean water, including a symbol for water as part of the graphics for MyPlate.

## **Dietary Recommendations**

We commend the DGAC's continued emphasis that healthy diets meet nutrient needs with whole foods, and, in particular, support the Committee's assessment that the overall body of evidence identifies a healthy dietary pattern as one that is:

- higher in fruits, vegetables, whole grains, low or non-fat dairy, seafood, legumes, and nuts;
- moderate in alcohol, among those who choose to drink, except for children and other individuals for whom alcohol consumption is not recommended;
- lower in red and processed meats; and
- lower in sugar-sweetened foods and drinks and refined grains.

## **Sustainability, Added Sugars, and Water**

We endorse the DGAC's recognition of sustainability as an essential component of federal dietary guidance. The DGAC took a measured but significant step in including a review of the relationship between dietary patterns and environmental impacts in terms of increased greenhouse gas emissions, land use, water use, and energy use. DGAC's comprehensive review of the literature found moderate to strong evidence that, "dietary patterns that promote health also promote sustainability." The findings support the assertion that sustainable dietary choices support both long-term and short-term nutritional

health, and are closely linked to the choices recommended for optimal nutrition. Our nation's ability to meet future food needs will depend on those environmental outcomes, particularly in the context of a changing climate, with more extremes in weather such as drought, resource shortages, changes in global dietary patterns, and population growth.

We support the DGAC's recommendations to reduce consumption of added sugars, and to incorporate added sugars into the Nutrition Facts label, including a percentage of a Daily Value based on 10 percent of calories or less in a 2,000-calorie diet, and for amounts expressed in teaspoons as well as grams to maximize consumer understanding.

In fact, we believe that a lower recommendation would be appropriate. Specifically, Americans should get no more than five to ten percent of their calories from added sugars. That recommendation would align the DGA with recommendations from the World Health Organization and the American Heart Association (AHA).

We are pleased to see specific inclusion of water as the preferred beverage of choice in the DGAC report, including the recognition that strategies are needed to ensure water is available in "public settings, as well as child care facilities, schools, worksites and other community places." In addition to the language contained in the report, we recommend that the Dietary Guidelines include specific guidance that plain tap water is the primary beverage of choice. Encouraging water consumption can help to build demand for improved access to clean and safe tap water, needed in many homes, schools, and WIC sites across the country. In addition to including strong language on drinking water in the 2015 DGA, CWA encourages the USDA to update MyPlate to include a symbol for water.

Thanks again for this opportunity to comment on this critical policy document. We look forward to a positive outcome in the final Guidelines.

Sincerely yours,

A handwritten signature in blue ink that reads "Karen Farley".

KAREN FARLEY, RD, IBCLC  
Executive Director