September 21, 2004

Kathryn McMurry
HHS Office of Disease Prevention and Health Promotion
Office of Public Health and Science
Suite LL100
1101 Wootton Parkway
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Dear Ms. McMurry:

Overall, the Dietary Guidelines Advisory Committee produced an excellent scientific report and basis for national nutrition programs and promotion. The scientific rationale and general advice regarding fats, refined sugars and complex carbohydrates, sodium, alcohol, and body weight are strong and well documented. Importantly, for the first time the Committee provided quantitative advice regarding trans fat, sodium, and whole grain intakes. The challenge now to HHS and USDA is to convey the Committee's science-based advice to the general public in a way that is accurate, understandable, actionable, and most conducive to improved diets.

While the supporting details of the report are important, it is the major messages of the *Dietary Guidelines* that are publicized most widely by the mass media and in nutrition-education materials. Thus, we urge HHS and USDA to adapt the Committee's nine major messages to make them clearer to the public. The messages should do more than provide a unifying theme for the dietary advice in a section of the *Guidelines*. The messages also must provide direct advice that people can understand and use to improve their diets. In particular, the messages concerning carbohydrates and fats are so vague as to be meaningless:

- \* Choose fats wisely for good health.
- \* Choose carbohydrates wisely for good health.

In contrast, previous editions of the *Dietary Guidelines for Americans* used such language as:

- \* Choose a diet that is low in saturated fat and cholesterol and moderate in total fat.
- \* Choose beverages and foods to moderate your intake of sugars.

We strongly urge HHS and USDA to recommend diets that are less conducive to heart disease by forthrightly stating what the Dietary Guidelines Advisory Committee more clearly lays out in the rationale accompanying the main message:

\* Choose a diet that is low in saturated fat, trans fat, and cholesterol and moderate in total fat.

It would be even clearer to the public (most people are not nutritionists) if that advice were expressed not in terms of nutrients, but in terms of foods. It could state:

\* Eat less cheese, beef, pork, whole and 2% milk, egg yolks, pastries, and other foods that are high in saturated fat, trans fat, or cholesterol.

People do not eat nutrients, they eat food. Providing advice about which foods to eat more of or less of is easier to understand and more effective than focusing on nutrients.

If the fat message was changed in that way, the main message concerning healthful foods could be changed to:

\* Eat more fruits and vegetables, whole grains, nonfat or low-fat milk and milk products, **beans, and fish**. (emphasis added for added words)

That one message would provide in a "nutshell" the basis of a very healthful diet.

Similarly, the advice to choose carbohydrates more wisely does not provide clear advice about which foods to eat or to limit. A key message under this section is to choose three servings of whole grains a day. However, that advice is also included under the message to "Increase Daily Intake of Fruits and Vegetables, Whole Grains, and Nonfat and Low-fat Milk and Milk Products." The other key message in this section is to limit intake of refined sugars. To avoid redundancy and convey this important dietary advice in a manner that in more understandable and available to the public, the carbohydrate main message should be edited to read:

\* Drink fewer soft drinks and limit cake, cookies, frozen desserts, and other foods rich in refined sugars.

The scientific rationale for such a statement is explained well in the Committee report. Concerns about the effects of added sugars on discretionary/essential calories and nutrient needs, dental caries, and obesity are discussed in several places in the report.

Just as the message about healthful foods encourages people to increase intake, since most Americans are under-consuming those foods, we suggest that the main message regarding calories reflect the fact that most Americans are overweight and over-consuming calories. The message about calorie intake ("Control calorie intake to manage body weight") should be edited to read:

\* Limit calorie intake to manage body weight.

We strongly urge HHS and USDA to build on the good work that the Dietary Guidelines Advisory Committee has done and ensure that their strong summary of nutrition science is translated into nutrition advice for the public that is easier to understand and put into practice. Given the limited budgets that the departments have for disseminating the *Guidelines*, it is especially important that the main messages be clear and actionable. We have provided some

suggestions as starting points and urge the Departments to conduct a series of focus groups to assess how our and others' suggestions could be refined to best motivate consumers to improve their diets.

Sincerely,

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