



**Society for
Nutrition
Education**

**Comments to the 2010 Dietary
Guidelines Advisory Committee
March 18, 2010**

The Society for Nutrition Education (SNE) commends the 2010 Dietary Guidelines Advisory Committee for its dedication to creating a set of guidelines that will continue to strengthen dietary recommendations that support public health and reduce chronic disease risk. SNE also commends the 2010 DGAC for calling on expert testimony from the broad range of disciplines that have well established and critical relevance to food, nutrition and public health. Because the *Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans, 2010* will serve as the foundation for recommendations to consumers, policy makers, and professionals, we urge the Committee to address the broad range of factors that influence individual food choices.

Further, SNE encourages the 2010 DGAC to generate a report that maintains the orientation established with the 2005 Dietary Guidelines toward a broader set of stakeholders, including policymakers, healthcare providers, nutritionists, and nutrition educators as well as the general public. The Society for Nutrition Education (SNE) would like to commend the 2005 Dietary Guidelines Advisory Committee for its strong and thorough report and this new orientation. Three documents regarding dietary guidance were released in 2005: the Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans, 2005; Dietary Guidelines for Americans, 2005 which serves as a policy and professional resource; and the consumer brochure developed by the Center for Nutrition Policy and Promotion (CNPP) – *Finding Your Way to a Healthier You*. We hope the 2010 Dietary Guidelines for Americans will continue to follow the format established by the 2005 Dietary Guidelines for Americans with the publication of distinct documents intended for different audiences.

SNE's comments focus on consumer education, the need for evidence-based, and food-based recommendations that emphasize plant based diets, consider the role of the food environment in influencing eating behaviors, and acknowledge the links between dietary choices, production methods, and public and ecological health. As the Dietary Guidelines Advisory Committee develops the next set of dietary guidelines for Americans, the Dietary Guidelines Subcommittee of SNE's Advisory Committee on Public Policy encourages you to:

1. Assure that consumer messages remain positive

SNE believes that the majority of the 2005 messages take a positive approach, which is supported by behavioral sciences research, and we encourage the 2010 Committee to continue in this vein. We also encourage the Committee to insure that key recommendations are translated into actionable messages.

Dietary guidance messages directed at consumers/lay public should be tested for relevancy to ensure they are both understandable and motivational. Translational research methods such as social marketing can help in the development and dissemination of consumer messages. For

example, USDA consumer tested messages include “Maximizing the Message” developed by the Food and Nutrition Service. Such an evidence-based approach to translational nutrition communication will assist educators in the delivery of science-based messages that resonate with the public¹⁻⁷, and in addition to testing messages, offer positive messages for food choice. For several decades nutrition advice has emphasized avoiding specific foods and nutrients. However, surveys of consumers and nutrition professionals have found that positive messages are more effective than negative messages. The Nutrient Rich Foods Coalition (NRFC) surveyed 250 Registered Dietitians and 250 pediatricians concerning nutrition education approaches⁸. Ninety-seven percent of dietitians and 96% of pediatricians agree that Americans need to think positively about what foods they can eat instead of negatively about what foods they can’t eat. Almost two-thirds of the dietitians believe the current focus on negative messages has contributed to the obesity problem.

A similar online survey of 1,019 adults⁹ commissioned by the NRFC found that two-thirds of Americans are more likely to respond to advice about how to eat for the entire day versus what individual foods they should eat or not eat. A family-based study of 41 children 8-12 years old was reported in the 2008 Journal of Obesity¹⁰. Epstein et al compared two approaches: increasing nutrient dense foods such as fruits and vegetables versus decreasing non-nutrient rich foods. Not only did the children in the positive message group decrease their BMIs more than did the negative message group, but parents of positive message children also showed decreased BMIs.

Cornell University Professor and current Vice President of SNE, Brian Wansink strongly advocates for positive nutrition messages to the average American consumer¹¹. His research shows that positive messages are most effective “with most people, with most mind-sets, in most nutrition situations” while negative messages may be more effective with highly involved nutrition professionals. Nutrition professionals are not the target audience, however they tend to design messages that work best with their peers instead of the consumer.

2. Strengthen existing recommendations to emphasize minimally processed foods in the diet.

Recommendations for healthful eating emphasize getting nutrients from a variety of minimally processed, whole foods^{12,13}. Whole foods¹, particularly plant-based foods, tend to be lower in dietary components associated with a higher risk for chronic disease (e.g., sucrose, saturated fats, cholesterol, and sodium), and generally higher in nutrients and components that are associated with more positive health outcomes (e.g., fiber, potassium, vitamins, phytochemicals). Foods provide essential nutrients, and nutrients are most beneficial to health when they are consumed in a natural form and in combination with each other¹⁴. For this reason, educational guidelines that center on food-based recommendations, rather than nutrient based, may be easier to interpret. Dietary recommendations that emphasize plant foods, though not necessarily to the exclusion of

¹ By minimally processed we mean foods that have been submitted to some process that does not substantially alter the inherent nutritional properties of the original foods which remain recognizable as such, while aiming to preserve them and make them more accessible, convenient, sometimes safer, and more palatable. Examples include: processes such as cleaning, removal of inedible fractions, portioning, refrigeration, freezing, pasteurization, fermenting, pre-cooking, drying, skimming, bottling and packaging. Fresh meat and milk, grains, pulses (legumes), nuts, and fruits, vegetables, roots and tubers sold as such, are usually minimally processed in various ways. (Source: Monteiro, CA. Public Health Nutrition: 12(5), 729–731)

animal foods, are consistent with accumulating evidence on the relationship between diet and health.

3. Include evidence related to the impacts of food environment on food choice.

The fact that the food or nutrition environment influences individual food choices has been well established¹⁶⁻¹⁸. There are many components of the “nutrition environment” such as availability, accessibility, price, marketing, etc. that individuals cannot mediate independently. However, it is nonetheless important to acknowledge, when providing dietary guidance to individuals or population groups, that while they may be independent actors in their own (and possibly their families) food choices, their choices are made in the context of this larger environment. The guidelines should also stress that higher dietary quality and weight management are generally easier to achieve when more food is prepared and consumed in the home¹⁹. Additionally, it is important to include recommendations that acknowledge cultural diversity in commonly consumed foods and eating patterns in the U.S.

Because of the influence of the nutrition environment on individual and population-wide dietary patterns, SNE recommends that the Committee’s report address such issues as availability, accessibility, affordability, cultural diversity, food marketing, and other elements of the nutrition environment to ensure that policy documents and consumer guidelines, which will be developed from this report, also address these concerns. In order to assist consumers in choosing high quality diets and healthy lifestyles, the food and activity environment must support at a minimum: 1) availability – the preponderance of foods in both retail and institutional settings must be nutrient dense; 2) accessibility – per capita density and ratio of supermarkets, grocery stores, farmers’ markets, and chain restaurants should ensure ready access to healthy foods and lesser access to foods of marginal nutrient density; 3) affordability – foods of greater nutrient density need to be more rather than less affordable^{20,21}; 4) marketing – studies have demonstrated that food marketing attracts children’s attention, influences their food choices, and prompts them to request the purchase of specific products, thus marketing, particularly to children, must be addressed; 5) foods that acknowledge the diverse cultural needs of the U.S. population; and 6) availability of safe physical activity opportunities.

4. Include evidence related to the impacts of food choices on the natural environment in the development of dietary guidance for the public

Finally, we encourage the Committee to address the issue of sustainability in its report. Recent policy briefs, including those from the World Bank²², United Nations Food and Agriculture Organization²³, Johns Hopkins and Pew Charitable Trusts²⁴, as well as position statements from several health related professional organizations²⁵⁻²⁸ recognize that methods of food production, which are tied to dietary choices, are a leading contributor to environmental degradation, ecosystem decline and climate change. A recent report from World Watch Institutes²⁹ estimates that nearly 40% of green house gas production can be attributed to the methods and types of foods produced. As each of these organizations clearly present, much of this ecological damage has been attributed to the already huge, and globally growing emphasis placed on animal food production, predominantly from large-scale Confined Animal Feeding Operations (CAFOs). Concerns about antibiotic over-use in the food supply, and its contribution to the development of

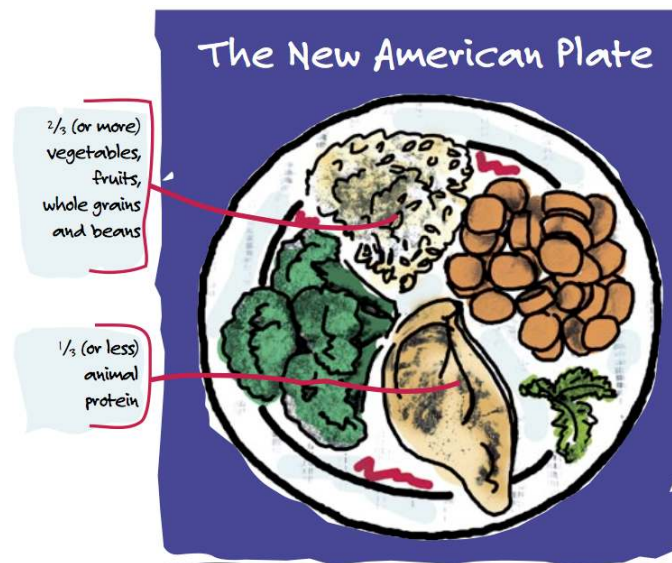
drug-resistant bacteria, as well as viral infections in closely confined livestock stem from the CAFO model of animal production^{24,30}.

National dietary guidelines should place greater emphasis on dietary patterns that are associated with the promotion of human health as well as reductions in environmental costs. The USDA's "Know Your Farmer, Know Your Food" webpage³¹, encourages Americans to consume foods that are associated with sustainable production methods. Yet current government policy disproportionately supports production of foods that are less ecologically sustainable. To promote bio-diversity in the food supply, conserve land, water, and soil, reign in global greenhouse gas production, and ensure that a wide variety of foods will be available for consumers to choose well into the future, sustainability needs to be addressed through both policy and individual food choices.

As a society of nutrition educators, we have need of credible tools for communicating nutrition information that can be translated into healthy behaviors for consumers, and thus SNE has a significant professional stake in the government's dietary guidelines for Americans. Thank you for your efforts to grapple with these complex issues and for your consideration to our recommendations, and we welcome the opportunity to provide further evidence in support of our recommendations if needed.

We propose the development of specific recommendations consistent with current evidence about diet and health that incorporate the following principles:

1. A health-promoting diet encompasses a variety of foods: primarily vegetables, fruits, whole grains, legumes, and nuts. This recommendation is well supported by the preponderance of evidence showing plant-based diets to be generally associated with better health^{15,16}.
2. Nuts, beans, lentils and nut butters provide protein, fiber and important nutrients and should be encouraged to be included in the diet more often, in recommended amounts. Lean meats, poultry, fish and eggs contribute high quality protein as well as other nutrients, and can be included in a healthful diet when consumed in recommended amounts.
3. That high fat meats, fried meats, and highly processed meats, such as sausage, bacon and many deli meats, be limited ("be consumed less frequently rather than regularly").
4. That dairy foods be low in fat or non-fat, and be consumed in recommended amounts.
5. That sugary and processed foods and beverages (cakes, cookies, potato chips, sweetened beverages, etc.) be replaced with more nutrient dense foods such as fruits, 100% juices, vegetables, low-fat dairy foods, whole grains and nuts.

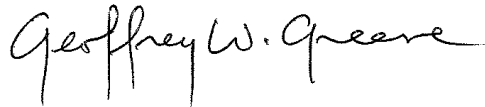


Start reshaping your diet by looking at your plate. Is the greater proportion of your meal plant-based? (See page 5.) Are your portion sizes appropriate to your activity level? (See page 14.)

The American Institute for Cancer Research has a tool for consumer education that illustrates proportionality of food groups, is based on current evidence indicating the importance of plant-based foods in chronic disease prevention and weight management, and is a good example of how to educate consumers on this message. (See graphic.)

As a society of nutrition educators, we have need of credible tools for communicating nutrition information to culturally, socially, and economically diverse audiences to help them implement healthy behaviors. Thus SNE has a significant professional stake in the government's dietary guidelines for Americans. Thank you for your efforts to grapple with these complex issues and for your consideration to our recommendations, and we welcome the opportunity to provide further evidence in support of our recommendations if needed.

Respectfully submitted,



Geoffrey W. Greene, PhD, RD, LDN, President
Society for Nutrition Education

ABOUT THE SOCIETY FOR NUTRITION

The Society for Nutrition Education is an international organization of nutrition education professionals who are dedicated to promoting effective nutrition education and communication to support and improve healthful behaviors with a vision of healthy communities through nutrition education and advocacy. Visit the Society for Nutrition Education at www.sne.org.

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