Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000652

Submission Date: 09/25/2009

Organization Type: Educational Institution

Organization Name: University of North Carolina at Chapel Hill

First Name: Adele

Last Name: Hite

Job Title: MPH/RD candidate

Key Topic: Carbohydrates, Evidence-based Review Process, Fats, Protein

Sub Topic:

Attachment: Y

Comment: Contradictions exist between the science contained in the 2005 Dietary Reference Intakes (Macronutrients) and the current nutritional recommendations and prevailing wisdom.

Comment ID: 000475

Submission Date: 04/28/2009

Organization Type: Educational Institution

Organization Name: Albert Einstein College of Medicine

First Name: Keith

Last Name: Ayoob

Job Title: Associate Clinical Professor of Pediatrics

Key Topic: Eating Patterns, Fats, Food Groups, Protein

Sub Topic: Cholesterol, Meat, Beans, Eggs, Fish, and Nuts, Saturated fatty acids

Attachment: Y

Comment: Please see attached commentary.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000727

Submission Date: 10/28/2009

Organization Type: Educational Institution

Organization Name:

First Name: Erika

Last Name: Bono

Job Title: Dietetics student

Key Topic: Eating Patterns, Fats, Minerals, Other

Sub Topic: Fish oil, Omega 3 fatty acids, Sodium

Attachment: N

Comment: Dear Committee Members,

Overall I am pleased with many of the aspects of our current dietary guidelines for Americans. I would like to offer suggestions for the 2010 guideline update that I think will supplement current recommendations for healthy living.

First, I would emphasize and promote the consumption of omega-3 fatty acids. Although polyunsaturated fats in general are encouraged over their saturated counterparts, I think a specific spotlight on these extremely beneficial essential fatty acids would help Americans increase quantity and frequency of consuming foods rich in omega-3s.

Secondly, I think daily sodium recommendations should more accurately reflect the variety of experimental outcomes and observations. The majority of those who have successfully elicited a reduction in blood pressure by adhering to a reduced sodium diet have been shown to have a higher sodium sensitivity than the majority of the American population. Also, some recent research supports the ineffectiveness of reduced sodium intake on the prevention of cardiovascular disease and overall mortality.

In my opinion, a focus that may result in a greater benefit to the American public would be the incorporation of ideal meal size and frequency (5 to 6 smaller meals) into the guidelines in order to avoid large spikes in blood glucose, but rather maintain a consistent level throughout the day.

Lastly, I would like to see a list of nutritious, wholesome, and sustainable food choices that average Americans could access and afford in order to support our farmers and our planet, and to promote food security nationwide.

I appreciate your time and consideration.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000696

Submission Date: 10/26/2009

Organization Type: Educational Institution

Organization Name: COLORADO STATE UNIVERSITY

First Name: MARY

Last Name: HARRIS

Job Title: PROFESSOR

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: AVERAGE INTAKE OF N-3 DHA FOR WOMEN IN THE UNITED STATES IS ABOUT 110 MG/DAY, WHICH IS WELL BELOW THAT OF OTHER DEVELOPED NATIONS. RECENTLY WHO AND THE EUROPEAN PERILIP GROUP HAVE ADOPTED A RECOMMENDATION FOR N-3 DHA DURING PREGNANCY AND LACTATION OF 200 MG/DAY. DESPITE GROWING EVIDENCE THAT DEMONSTRATES BENEFITS TO MOTHERS SUCH AS DECREASED RISK FOR PERINATAL DEPRESSION AND OPTIMAL NEUROCOGNITIVE DEVELOPMENT IN INFANTS, THERE IS NO CURRENT DRI FOR N-3 DHA IN THE US.

Comment ID: 000639

Submission Date: 09/22/2009

Organization Type: Educational Institution

Organization Name: UNC Asheville

First Name: Samantha

Last Name: Maser

Job Title: Student

Key Topic: Fats, Food Groups

Sub Topic: Cholesterol, Milk, Saturated fatty acids, Trans fatty acids

Attachment: Y

Comment: Please See Attached Comment

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000687

Submission Date: 10/25/2009

Organization Type: Educational Institution

Organization Name: Kansas State University

First Name: Abigail

Last Name: Bauer

Job Title: MPH Student

Key Topic: Fats, Food Groups, Other

Sub Topic: Milk, Other, Trans fatty acids

Attachment: Y

Comment: Additions to the 2010 Dietary Guidelines should include the following topics:

1) Recommendations that are more suitable for individuals who cannot or choose not to consume dairy products. More emphasis should be placed on alternative sources of calcium.
2) Disclosure of any level of trans-fats in nutritional labels.
3) The importance of educating consumers about the nutritional implications of fast food and restaurant dining.

Please see more detail about these topics in the attached letter.

Comment ID: 000635

Submission Date: 09/22/2009

Organization Type: Educational Institution

Organization Name: University of North Carolina at Asheville

First Name: Amanda

Last Name: Hall

Job Title: Pre-Med Student

Key Topic: Fats, Other

Sub Topic: Trans fatty acids

Attachment: Y

Comment: Attached are comments related to trans fats, diabetes, and corn syrup.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000708

Submission Date: 10/27/2009

Organization Type: Individual/Professional

Organization Name: Diet Heart Publishing

First Name: Alan

Last Name: Watson

Job Title: author, editor

Key Topic: Carbohydrates, Fats

Sub Topic: Cholesterol

Attachment: Y

Comment: There is compelling evidence that the low fat diet has failed the test of time. Thirty years after the publication of the first low fat Dietary Guidelines for Americans (1980), we are facing serious "unintended consequences." Today, according to the CDC in Atlanta, our country is facing runaway obesity and diabetes - and heart disease has not gone down as promised.

Young children are being diagnosed with type II diabetes and now even heart disease. At the other end of the age spectrum, slow, suffocating heart failure is the #1 Medicare expenditure. In record levels, Americans are being diagnosed with a cluster of abnormalities called Metabolic Syndrome. Diabetes, Metabolic Syndrome, and heart failure have nothing to do with eating bacon and eggs for breakfast or enjoying roast beef on Sunday afternoon.

Why? Because we are no longer eating eggs, butter, and roast beef. After 30 years of experimenting with an untested low fat diet, the DGAC must consider whether the low fat guidelines themselves are the root cause of obesity, diabetes, heart disease, and many types of cancer! Revising these guidelines in 2010 and restoring America's traditional whole foods high fat diet will be the first step in reducing the chronic disease overload now threatening to topple America's expensive, failing health care system.

The 2010 Dietary Guidelines should tell the truth about America's most demonized nutrients: Dietary fat and cholesterol. The current 2005 Dietary Guidelines blame fat and continue to overlook the role of elevated blood sugar and hyperinsulinism in chronic disease. I feel that the preponderance of the latest scientific and medical evidence suggests that the official embrace of ungraded carbohydrates (lumped together and up to 65 percent of calories) is the problem and the restoration of America's whole foods high fat diet is the solution.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000590

Submission Date: 08/21/2009

Organization Type: Individual/Professional

Organization Name:

First Name: Juliette

Last Name: Howe, Ph.D.

Job Title:

Key Topic: Eating Patterns, Evidence-based Review Process, Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: A survey conducted in 2006 to assess the external fat thickness of beef in US retail establishments found that external fat from beef cuts marketed today is less than 0.11 cm, which is practically devoid of external fat. To help better assess the content of the American diet, we spent several years updating the information on the fat content of meats. A comparison of data from Agriculture Handbook 8?10 in 1962 to SR 21 published in 2008 clearly demonstrates a reduction in total fat and saturated fat in most beef cuts, as illustrated in the accompanying table. Cuts denoted as ?separable lean only? in this table are trimmed of all visible fat prior to nutrient analyses; cuts denoted as ?separable lean and fat? represent the cuts as purchased in the market place. Between 1962 and 2008, total fat and saturated fat content decreased on average by 34% and 45%, respectively.

It is obvious from these data that beef is a significantly leaner product today than in 1962, as well as in 1980 when the first Dietary Guidelines were released. In fact, twenty-nine (29) cuts of beef meet government guidelines for lean according to the data published in SR. These facts underscore the importance of using the most recent SR data available. Use of older versions could result in overestimating population intake of fat as well as the fat content of nutrient-dense beef products.

Comment ID: 000589

Submission Date: 08/20/2009

Organization Type: Individual/Professional

Organization Name:

First Name: Peter

Last Name: Huth

Job Title: Principal

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: Based on existing evidence from clinical and prospective epidemiological studies, there is little compelling evidence that reducing SFA below the current Dietary Guidelines of <10% of energy will result in measurable reductions in CVD morbidity and mortality nor, as indicated in the Fatty Acid Subcommittee?s April presentation, is it likely that the American public would be able to comply with more stringent saturated fat reductions. Furthermore, there is recognition that some subpopulations may not benefit and may even be harmed by substituting increasing amounts of CHO for dietary SFA. Thus, there appears to be very real potential negative implications for further restricting SFA in some

subpopulations beyond current U.S. Dietary Guidelines that requires careful consideration.

Comment ID: 000529

Submission Date: 06/18/2009

Organization Type: Individual/Professional

Organization Name: Martek Biosciences Corporation

First Name: Rodney

Last Name: Gray

Job Title: Vice President, Regulatory Affairs

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: The 2010 Dietary Guidelines provide an excellent opportunity to educate U.S. women regarding the risks and benefits associated with fish consumption during pregnancy and the health benefits of long-chain omega-3 fatty acids (n-3 LCPUFA), particularly DHA. A recent publication by Health Canada, ?Prenatal Nutrition Guidelines for Health Professionals: Fish and Omega-3 Fatty Acids?, provides a balanced view of the benefits of n-3 LCPUFA while providing guidance on the types of fish to avoid or include as part of a healthy diet during pregnancy and nursing. The March of Dimes has also recently issued guidance regarding DHA intake for maternal health. Given the important role of DHA in maternal health and infant neurodevelopment it is respectfully requested that the Dietary Guidelines Advisory Committee consider addition of guidance language regarding the benefits of fish and DHA-fortified foods in the diets of pregnant and nursing women.

Comment ID: 000699

Submission Date: 10/26/2009

Organization Type: Individual/Professional

Organization Name: www.AskDrSears.com

First Name: William

Last Name: Sears

Job Title: Owner

Key Topic: Fats

Sub Topic:

Attachment: Y

Comment: Attached is a comment regarding the importance of omega-3 fatty acids for the Dietary Guidelines for Americans.
William Sears, M.D.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000550

Submission Date: 07/10/2009

Organization Type: Individual/Professional

Organization Name:

First Name: Juliette

Last Name: Howe

Job Title:

Key Topic: Fats, Food Groups

Sub Topic: Meat, Beans, Eggs, Fish, and Nuts, Saturated fatty acids

Attachment: Y

Comment: According the the USDA Nutrient Database, between 1992 and 2008, total fat for the outlined pork cuts has decreased by 20-36% and saturated fat has decreased by 22-41%. Pork is also a source of monounsaturated fat. For a 3-ounce cooked serving of pork center rib chop, 42% of total fat is from monounsaturated fat.

Comment ID: 000477

Submission Date: 04/29/2009

Organization Type: Industry Association

Organization Name: Malaysian Palm Oil Council

First Name: Kalyana

Last Name: Sundram

Job Title: Deputy Chief Executive Officer & Director, Science and Environment

Key Topic: Carbohydrates, Eating Patterns, Fats

Sub Topic: Other

Attachment: Y

Comment: For your kind consideration, attached is one of four studies that I believe would be of interest in the guidelines selection process.

New England Journal of Medicine ? Comparison of Weight-Loss Diets with Different Compositions of Fat, Protein, and Carbohydrates

Summary: In this study, researchers compared the effects on body weight of energy-reduced diets that differed in their targets for intake of macronutrients ? low or high in fat, average or high in protein, or low or high in carbohydrates ? an otherwise followed recommendations for cardiovascular health. After two years it was determined that reduced-calories diets result in clinically meaningful weight loss regardless of which macronutrients they emphasize.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000557

Submission Date: 07/24/2009

Organization Type: Industry Association

Organization Name: National Confectioners Association

First Name: Alison

Last Name: Bodor

Job Title: Vice President, Scientific and Regulatory Affairs

Key Topic: Carbohydrates, Eating Patterns, Fats, Nutrient Density/Discretionary Calc, Other

Sub Topic: Cholesterol, Other, Saturated fatty acids

Attachment: Y

Comment: NCA supports steps to improve Americans? ability to follow a healthy and active lifestyle and urges the DGAC to pursue guidelines that are realistic and accommodate all foods including occasional treats in moderation. NCA also recommends the Subcommittee on Fatty Acids recognize the neutral effect of stearic acid on blood lipid levels and distinguish between stearic acid and the other saturated fatty acids when making recommendations about saturated fat. While stearic acid, a significant fatty acid in cocoa butter, has a neutral effect on blood lipid profiles, the flavanols in cocoa and chocolate support cardiovascular health. Finally, we request that the DGAC recognize the contribution of sugar-free chewing gum to oral health and weight management in their recommendations.

Comment ID: 000520

Submission Date: 06/02/2009

Organization Type: Industry Association

Organization Name: National Cattlemen's Beef Association

First Name: Kristina

Last Name: Butts

Job Title: Manager, Legislative Affairs

Key Topic: Eating Patterns, Evidence-based Review Process, Fats, Food Groups, Protein

Sub Topic: Meat, Beans, Eggs, Fish, and Nuts, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids

Attachment: Y

Comment: Given the unique fatty acid profile and rich micronutrient content of beef, the role of beef in health outcomes, independent from other animal proteins, warrants independent review. One of the attached documents highlights newly published data regarding the limited role of dietary saturated fat on chronic disease risk, expands the previously submitted EBR to include HDL-cholesterol outcomes, and offers rationale to support a sub-question regarding the effect of beef on cardiovascular risk factors for consideration by both Subcommittees. In brief summary, evidence from randomized-controlled trials indicates that lean beef can lower LDL-cholesterol 7-12%, with or without weight loss, when included in a diet consistent with the 2005 Dietary Guidelines. A brief review of the scientific evidence suggests that plant-proteins may do little to reduce the risk of chronic disease, particularly cardiovascular disease. A second document outlining the rationale to support a sub-question regarding how a plant protein-based diet compares to that of an animal protein-based diet with regard to cardiovascular disease risk factors is provided for consideration by the Carbohydrate and Protein Subcommittee. In absence of compelling evidence to support recommendations for the substitution of plant proteins for animal proteins to reduce cardiovascular disease risk, the Subcommittees are asked to

consider, at a minimum, maintaining 2005 Dietary Guidelines recommendations for lean beef in the 2010 Dietary Guidelines.

Comment ID: 000467

Submission Date: 04/24/2009

Organization Type: Industry Association

Organization Name: United Egg Producers

First Name: Gene

Last Name: Gregory

Job Title: President

Key Topic: Eating Patterns, Fats, Food Groups, Nutrient Density/Discretionary Calc

Sub Topic: Cholesterol

Attachment: Y

Comment: These are the comments of the United Egg Producers regarding the Dietary Guidelines.

Comment ID: 000505

Submission Date: 05/26/2009

Organization Type: Industry Association

Organization Name: Paramount Farms, Inc.

First Name: Dominic

Last Name: Engels

Job Title: Vice President of Marketing

Key Topic: Eating Patterns, Fats, Protein

Sub Topic:

Attachment: Y

Comment: Comment is attached.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000521

Submission Date: 06/03/2009

Organization Type: Industry Association

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: Background: Saturated fatty acid (SFA) intake increases plasma LDL-cholesterol concentrations; therefore, intake should be reduced to prevent coronary heart disease (CHD). Lower habitual intakes of SFAs, however, requires substitution of other macronutrients to maintain energy balance.

Objective: We investigated associations between energy intake from monounsaturated fatty acids (MUFAs), polyunsaturated fatty acids (PUFAs), and carbohydrates and risk of CHD while assessing the potential effect-modifying role of sex and age. Using substitution models, our aim was to clarify whether energy from unsaturated fatty acids or carbohydrates should replace energy from SFAs to prevent CHD.

Comment ID: 000479

Submission Date: 04/29/2009

Organization Type: Industry Association

Organization Name: Malaysian Palm Oil Council

First Name: Kalyana

Last Name: Sundram

Job Title: Deputy Chief Executive Officer & Director, Science and Environment

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: For your kind consideration, attached is one of four studies that I believe would be of interest in the guidelines selection process.

American Journal of Clinical Nutrition ? Desaturation and interconversion of dietary stearic and palmitic acids in human plasma and lipoproteins

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000483

Submission Date: 04/29/2009

Organization Type: Industry Association

Organization Name: Malaysian Palm Oil Council

First Name: Kalyana

Last Name: Sundram

Job Title: Deputy Chief Executive Officer & Director, Science and Environment

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: For your kind consideration, attached is one of four studies that I believe would be of interest in the guidelines selection process.

American Journal of Clinical Nutrition ? Metabolism of dietary stearic acid relative to other fatty acids in human subjects

Summary: These studies, using definitive stable isotope methods, found that very little stearic acid is converted in the body. Stearic acid does not act like oleic acid in the body, and it is not converted to oleic acid. Additionally, conversion of palmitic acid to palmitoleic acid was approximately the same as for stearic.

Comment ID: 000465

Submission Date: 04/24/2009

Organization Type: Industry Association

Organization Name: Martek Biosciences

First Name: Connye

Last Name: Kuratko

Job Title: Principal Scientist

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: Dear Dietary Guidelines Committee,

In a previous posting to this site we summarized the results of a systematic review conducted regarding the health benefits of long chain n-3 fatty acids (n-3 LCPUFA) and docosahexaenoic acid (DHA) in particular since the publication of the 2005 Dietary Guidelines for Americans. As a follow-up to our summary document, we are providing the enclosed details regarding methodology, search results, and included/excluded studies.

It is our goal to provide the Committee with the most recent research regarding the health benefits of DHA and the other long chain n-3 fatty acids. The results of this systematic

review support the need for guidance concerning DHA and other n-3 LCPUFA in the 2010 Dietary Guidelines. It is our hope that you will provide dietary guidance which includes frequent consumption of foods which supply DHA and other n-3 LCPUFA particularly among vulnerable subpopulations such as pregnant and nursing women and young children.

If you have any questions please do not hesitate to contact us.

Regards,

Connye Kuratko, PhD, RD
Mary van Elswyk, PhD, RD
On behalf of Martek Biosciences

Comment ID: 000466

Submission Date: 04/24/2009

Organization Type: Industry Association

Organization Name: Martek Biosciences

First Name: Connye

Last Name: Kuratko

Job Title: Principal Scientist

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: Dear Committee members,
Attached are the Appendices for the Systematic Review posted earlier today.
Regards,
Connye Kuratko
on behalf of Martek Biosciences

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000564

Submission Date: 07/29/2009

Organization Type: Industry Association

Organization Name: Martek Biosciences

First Name: Rodney

Last Name: Gray

Job Title: Vice President, Regulatory Affairs

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: Attached is a letter to the Dietary Guidelines Advisory Committee for review regarding long chain omega-3 fatty acids and the primary prevention of cardiovascular disease. Also attached is a document of scientific opinion from the European Food Safety Authority.

Comment ID: 000623

Submission Date: 09/14/2009

Organization Type: Industry Association

Organization Name: Martek Biosciences

First Name: Norman

Last Name: Salem, Jr.

Job Title: Vice President, Chief Scientific Officer

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: The newest issue of PLEFA addresses the importance of docosahexaenoic acid (DHA) for health. Please see attached letter.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000664

Submission Date: 10/05/2009

Organization Type: Industry Association

Organization Name: National Association of Margarine Manufacturers (NAMM)

First Name: Sarah

Last Name: Wally

Job Title: Manager, Nutrition Communications

Key Topic: Fats

Sub Topic: Cholesterol, Oils, Unsaturated fatty acids, Saturated fatty acids, Trans fatty acids

Attachment: Y

Comment: NAMM encourages the Committee to inform consumers that high intake of trans fat ? from both natural and industrially produced sources ? is associated with a greater risk of cardiovascular disease. Please find comments attached.

Comment ID: 000514

Submission Date: 05/29/2009

Organization Type: Industry Association

Organization Name: National Fisheries Institute

First Name: Jennifer

Last Name: McGuire, MS, RD

Job Title: Manager, Nutrition Communication

Key Topic: Fats, Food Groups, Protein

Sub Topic: Fish oil, Omega 3 fatty acids, Meat, Beans, Eggs, Fish, and Nuts

Attachment: Y

Comment: Please see comments regarding the emerging idea of splitting sources of protein in to subcategories.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000619

Submission Date: 09/11/2009

Organization Type: Industry Association

Organization Name: Martek Biosciences

First Name: Rodney

Last Name: Gray

Job Title: Vice President, Regulatory Affairs

Key Topic: Fats, Food Safety

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: EU recommends preformed DHA AI for Maternal Health. Please see attached letter.

Comment ID: 000597

Submission Date: 08/26/2009

Organization Type: Industry Association

Organization Name: BC Salmon Farmers Association and others

First Name: Mary Ellen

Last Name: Walling

Job Title: Executive Director

Key Topic: Fats, Food Safety, Protein

Sub Topic:

Attachment: Y

Comment: The attached comments and scientific citations address common questions about farm-raised salmon

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000583

Submission Date: 08/18/2009

Organization Type: International Organization

Organization Name: International Society for the Study of Fatty Acids and Lipids (ISSFAL)

First Name: Ray

Last Name: Rice

Job Title: Secretary/Treasurer

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids, Oils, Unsaturated fatty acids

Attachment: Y

Comment: ISSFAL has produced an official statement reflecting our consensus view on the question of the extent to which the 18 carbon omega-3 polyunsaturate alpha-linolenic acid (ALA) can be metabolised to the more biologically active 20 and 22 carbon omega-3 polyunsaturates eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA). The conclusion from this comprehensive expert review is that in most people there is very little conversion of ALA to EPA, and even less to DHA.
I attach a word document of this statement, which was also published in the April 2009 issue of the Society official journal, Prostaglandins,Leukotrienes and Essential Fatty Acids. It can also be viewed on the Society website at www.issfal.org.uk/

Comment ID: 000681

Submission Date: 10/22/2009

Organization Type: Nonprofit/Voluntary

Organization Name: The Weston A. Price Foundation

First Name: Sally Fallon

Last Name: Morell

Job Title: President

Key Topic: Carbohydrates, Fats, Food Groups, Minerals, Vitamins

Sub Topic: B Vitamins, Calcium, Cholesterol, Meat, Beans, Eggs, Fish, and Nuts, Milk, Saturated fatty acids, Trans fatty acids, Vitamin A and Carotenoids, Vitamin D, Zinc

Attachment: Y

Comment: Current USDA dietary guidelines are on the flawed notion that cholesterol and saturated fat are unhealthy. They are unrealistic, unworkable, unscientific and impractical; they have resulted in widespread nutrient deficiencies and contributed to a proliferation of obesity and degenerative disease, including problems with growth, behavior and learning in children. The US government is promoting a lowfat, plant-based diet that ignores the vital role animal protein and fats have played in human nutrition throughout the ages.

The Weston A. Price Foundation strongly urges the USDA Dietary Guidelines committee to scrap the food pyramid and replace it with the following Healthy 4 Life guidelines, based on four groups of whole foods.

Every day, eat high quality, whole foods to provide an abundance of nutrients, chosen from each of the following four groups:

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

1. Animal foods: meat and organ meats, poultry, and eggs from pastured animals; fish and shellfish; whole raw cheese, milk and other dairy products from pastured animals; and broth made from animal bones.

2. Grains, legumes and nuts: whole-grain baked goods, breakfast porridges, whole grain rice; beans and lentils; peanuts, cashews and nuts, properly prepared to improve digestibility.

3. Fruits and Vegetables: preferably fresh or frozen, preferably locally grown, either raw, cooked or in soups and stews, and also as lacto-fermented condiments.

4. Fats and Oils: unrefined saturated and monounsaturated fats including butter, lard, tallow and other animal fats; palm oil and coconut oil; olive oil; cod liver oil for vitamins A and D.

Avoid: foods containing refined sweeteners such as candies, sodas, cookies, cakes etc.; white flour products such as pasta and white bread; processed foods; modern soy foods; polyunsaturated and partially hydrogenated vegetable oils and fried foods.

Comment ID: 000741

Submission Date: 10/28/2009

Organization Type: Nonprofit/Voluntary

Organization Name: National Dairy Council

First Name: Gregory

Last Name: Miller

Job Title: Executive Vice President, Research, Regulatory and Scientific Affairs

Key Topic: Eating Patterns, Energy Balance/Physical Activity, Fats, Fluid and Electrolytes, Food Groups, Minerals, Nutrient Density/Discretionary Calc, Protein, Vitamins

Sub Topic: B Vitamins, Calcium, DASH, Magnesium, Milk, MyPyramid, Potassium, Saturated fatty acids, Vitamin A and Carotenoids, Vitamin D, Weight maintenance

Attachment: Y

Comment: The National Dairy Council appreciates the opportunity to comment on these important issues in support of improving the health and well-being of all Americans. Please consider the attached science-based comments.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000493

Submission Date: 05/08/2009

Organization Type: Nonprofit/Voluntary

Organization Name: Carolina Animal Action

First Name: Stewart

Last Name: David

Job Title: President

Key Topic: Eating Patterns, Evidence-based Review Process, Fats, Food Groups

Sub Topic:

Attachment: N

Comment: The excessive consumption of animal products has been scientifically and conclusively linked to a myriad of human diseases. Encouraging people to eat plant-based diets would play a critical role in disease prevention. This simple change would greatly reduce the incidences of diabetes, many cancers, cardiovascular disease, obesity, etc. It's time to get the money and politics out of the dietary guidelines and follow the science.

Comment ID: 000628

Submission Date: 09/20/2009

Organization Type: Nonprofit/Voluntary

Organization Name: The Weston A. Price Foundation

First Name: Sally

Last Name: Fallon Morell

Job Title: President

Key Topic: Eating Patterns, Fats, Food Groups, Vitamins

Sub Topic: Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Saturated fatty acids, Trans fatty acids, Vegetables, Vitamin A and Carotenoids, Vitamin D

Attachment: N

Comment: Current USDA dietary guidelines are unrealistic, unworkable, unscientific and impractical; they have resulted in widespread nutrient deficiencies and contributed to a proliferation of obesity and degenerative disease, including problems with growth, behavior and learning in children.

The pyramid with its strictures on fat restriction does not recognize variations in human metabolism. Recommendations for fat restriction are predicated on the assumption that fat causes weight gain; several recent studies have shown that restriction of natural fats actually leads to obesity in both children and adults, while the trans fats that frequently replace natural saturated fats contribute to weight gain. Restriction of animal fats leads to deficiencies of vitamins A, D and K2, needed for growth, strong bones, immunity, neurological function, and protection from tooth decay.

RECOMMENDED NEW GUIDELINES:
Every day, eat high quality, whole foods to provide an abundance of nutrients, chosen from each of the following four groups:

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

1. Animal foods: meat and organ meats, poultry, and eggs from pastured animals; fish and shellfish; whole raw cheese, milk and other dairy products from pastured animals; and broth made from animal bones.

2. Grains, legumes and nuts: whole-grain baked goods, breakfast porridges, whole grain rice, beans and lentils; peanuts and nuts, properly prepared to improve digestibility.

3. Fruits and Vegetables: preferably fresh or frozen, preferably locally grown, either raw, cooked or in soups and stews, and also as lacto-fermented condiments.

4. Fats and Oils: unrefined saturated and monounsaturated fats including butter, lard, tallow and other animal fats; palm oil and coconut oil; olive oil; cod liver oil for vitamins A and D.

Avoid: foods containing refined sweeteners such as candies, sodas, cookies, cakes; white flour products; processed foods; modern soy foods; polyunsaturated and partially hydrogenated vegetable oils.

Comment ID: 000540

Submission Date: 06/30/2009

Organization Type: Nonprofit/Voluntary

Organization Name: International Life Sciences Institute North American Branch

First Name: Eric

Last Name: Hentges

Job Title: Executive Director

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids, Trans fatty acids

Attachment: Y

Comment: A panel of experts convened at an ILSI North America workshop recently published their opinion that a clear, direct relationship exists between EPA+DHA intake and risk of fatal (and possibly nonfatal) CHD, providing evidence that supports a nutritionally-achievable Dietary Reference Intake (DRI) for EPA+DHA between 250 and 500 mg/d. A summary of key data are presented here. These comments also describe results of a project in which the impact of various trans fatty acid substitutes on population CVD risk is estimated.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000541

Submission Date: 06/30/2009

Organization Type: Nonprofit/Voluntary

Organization Name: International Life Sciences Institute North American Branch

First Name: Eric

Last Name: Hentges

Job Title: Executive Director

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: This attachment, the Journal of Nutrition publication, "Towards dietary reference intakes for EPA and DHA," accompanies comments uploaded 6/30/09 that describe expert panel recommendations for EPA+DHA intake.

Comment ID: 000497

Submission Date: 05/20/2009

Organization Type: Other

Organization Name: Will

First Name: Aliaga

Last Name:

Job Title:

Key Topic: Carbohydrates, Eating Patterns, Fats, Minerals, Protein

Sub Topic:

Attachment: N

Comment: Is there any possible way you can research more on the advantages of a high protein diet. High protein with an addition of "good carbs" such as those from whole wheat products, oatmeal, and fruits can become an advantageous meal. Though I am not a profession or doctor or anything, I have researched nutrition for a bit.

I have read that protein is a chain of amino acids. And one of these amino acids (can not recall which) is a stimulant in the brain. So, the more of this amino acid the better one feels neurologically, and this changes a person's overall mood throughout the day. A high protein diet is not only good in helping people keep muscle on, but it also makes them feel good. Speaking of muscle, one loses more weight when they have more muscle, because muscle burns more calories than fat. So, in order to maintain weight or lose weight, one must exercise and eat a good amount of protein and try to avoid carbs before bed.

Also, please do not exclude fat from the pyramid. Fats are essential to the human body, but they must be fatty acids such as Omega-3 fat that comes from salmon and other fish products.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Additionally, can you please review the milk standards. When milk is pasteurized it burns the bad germs from it, but at the same time it burns some of the good bacteria, so would raw milk be a good suggestion?

Calcium is extremely important because bones do not stop growing (in density) until the age of around 30. So, please emphasize calcium, which can be digested through supplements.

Please emphasize that a person's diet is extremely important. In order to reach a goal (whether it be it weight, body sculpting, athletic goals, or overall well being) a person must exercise AND watch what they eat. Their diet is 90% of their goals.

Thank you,
Will

Comment ID: 000672

Submission Date: 10/12/2009

Organization Type: Other

Organization Name: General Mills Inc.

First Name: Kathryn

Last Name: Wiemer

Job Title: Fellow/Director

Key Topic: Carbohydrates, Fats, Food Groups

Sub Topic: Fiber, Fish oil, Omega 3 fatty acids, Grains, Whole grains, Whole grains

Attachment: Y

Comment: Our comments address key scientific considerations and recommendations regarding : whole grains, including definition, importance in the diet and science-based health benefits, and omega-3 fatty acids.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000680

Submission Date: 10/21/2009

Organization Type: Other

Organization Name: Lovett

First Name: Jeremy

Last Name: Plone

Job Title: health teacher

Key Topic: Fats

Sub Topic:

Attachment: N

Comment: processed fats are not good for you! Do NOT eat them!!! Dont go to the dark side!!!! dont go to the light!!!! be healthy

Comment ID: 000637

Submission Date: 09/22/2009

Organization Type: Other

Organization Name:

First Name: April

Last Name: Bradshaw

Job Title: Student

Key Topic: Fats

Sub Topic: Trans fatty acids

Attachment: Y

Comment: Many consumers do not know how to interpret the meaning of trans-fat content on the Nutrition Facts panel. In fact, without specific prior knowledge about trans fat and its negative health effects, consumers, including those at risk for heart disease, may misinterpret nutrient information provided on the panel. Also, there is no requirement to list trans fats on institutional food packaging; thus bulk purchasers such as schools, hospitals, and cafeterias are unable to evaluate the trans fat content of commercial food items. Trans fat should be labeled on all foods including fresh bakery products, etc. Restrictions on restaurant usage should be imposed as well.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000485

Submission Date: 05/03/2009

Organization Type: Other

Organization Name:

First Name: tabinda

Last Name: firdaus

Job Title:

Key Topic: Fats

Sub Topic: Cholesterol

Attachment: N

Comment: One should eat good food.That food should be healthy.there should be no cholesterol in it or low cholesterol in it.. Fat is not good for health. It increases your weight. If you weigh more the chances of getting diabetes and blood pressure increase.and you can have heart attack. these are very bad things.

Comment ID: 000531

Submission Date: 06/18/2009

Organization Type: Other

Organization Name: Martek Biosciences Corporation

First Name: Rodney

Last Name: Gray

Job Title: Vice President, Regulatory Affairs

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: The 2010 Dietary Guidelines provide an excellent opportunity to educate U.S. women regarding the risks and benefits associated with fish consumption during pregnancy and the health benefits of long-chain omega-3 fatty acids (n-3 LCPUFA), particularly DHA. A recent publication by Health Canada, ?Prenatal Nutrition Guidelines for Health Professionals: Fish and Omega-3 Fatty Acids?, provides a balanced view of the benefits of n-3 LCPUFA while providing guidance on the types of fish to avoid or include as part of a healthy diet during pregnancy and nursing. The March of Dimes has also recently issued guidance regarding DHA intake for maternal health. Given the important role of DHA in maternal health and infant neurodevelopment it is respectfully requested that the Dietary Guidelines Advisory Committee consider addition of guidance language regarding the benefits of fish and DHA-fortified foods in the diets of pregnant and nursing women.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000523

Submission Date: 06/05/2009

Organization Type: Other

Organization Name: Monsanto Company and Solae LLC

First Name: Priscilla

Last Name: Samuel

Job Title: Director of Nutrition Sciences, Scientific & Regulatory Affairs

Key Topic: Fats

Sub Topic: Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: The 2005 Dietary Guidelines Advisory Committee Report on fats reached the conclusion that omega-3 fatty acids have a positive impact on health. Stearidonic acid (SDA) may be beneficial in increasing intakes of n-3 fatty acids. Moreover, SDA is potentially a biologically active precursor to eicosapentaenoic acid (EPA) based on its relatively efficient conversion to EPA following consumption. Emerging evidence suggests omega-3 enriched soybean oil (especially enriched in stearidonic acid) is more efficiently converted to eicosapentaenoic acid (EPA) than alpha-linolenic (ALA).

The Committee acknowledged in 2005 that:

?Other sources of long chain n-3 fatty acids are currently on the market. Some are fortified with deodorized fish oil or contain algae as the source of EPA + DHA. With the pending availability of agronomic crops such as corn and soybeans that have been genetically enhanced to contain EPA and DHA, it is conceivable that vegetable oils rich in these n-3 fatty acids will become an important plant source of these fatty acids?.

The US populations? dietary intakes of effective omega-3 fatty acids continues to be far below what would be considered by experts to be adequate for optimal health. The key to increasing omega-3 fatty acid intake may be to encourage intake of a wider range of foods enriched in omega-3 fatty acids that suit their usual dietary habits and fit within their budgets. Plant-based SDA sources, including SDA-enriched soybean oil, as part of the current and future food supply provide a valuable and meaningful source of omega-3 fatty acids. The 2010 Committee is encouraged to re-evaluate the 2005 report conclusions to assess whether consumers have adapted their behavior to include two servings of fatty fish or whether guidance would be more impactful if it included a target intake level of EPA and DHA that consumers could reach using a variety of foods (including fatty fish) and supplements instead.

Comments Summary Report

Submission Date Between 04/24/2009 and 10/28/2009

Key Topic: Fats

Comment ID: 000684

Submission Date: 10/23/2009

Organization Type: Other

Organization Name: The Hershey Company

First Name: Daniel

Last Name: Azzara

Job Title: Vice President, Global Research & Development

Key Topic: Fats

Sub Topic: Saturated fatty acids

Attachment: Y

Comment: The purpose of these comments is to respectfully request the Dietary Guidelines Advisory Committee (DGAC) to consider excluding stearic acid from dietary recommendations for saturated fatty acids based on the body of consistent scientific evidence that stearic acid in foods such as chocolate/cocoa butter, beef, and butter has neutral effects on blood lipids and lipoproteins. The Hershey Company makes this request because of the potential practical and regulatory ramifications of including stearic acid with other saturated fats known to negatively impact cardiovascular risk factors. The exclusion of stearic acid from dietary guidance on saturated fatty acids would provide more accurate information to consumers regarding cardiovascular risks associated with the consumption of saturated fats in the diet.

Comment ID: 000711

Submission Date: 10/27/2009

Organization Type: Other

Organization Name:

First Name:

Last Name:

Job Title:

Key Topic: Fats, Protein

Sub Topic: Trans fatty acids

Attachment: N

Comment: Dear Committee Members,

I am concerned that the push of meats and proteins interferes with trying to avoid trans-fats and saturated fats. The Dietary Guidelines for Americans does address the fact that these fats are found in animal products but I feel it is easily looked over. Please make a clarification and emphasize this issue.