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

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.
Comment ID: 000638
Submission Date: 09/22/2009
Organization Type: Educational Institution
Organization Name: UNC Asheville
First Name: Stephanie
Last Name: Tullos
Job Title: Student
Key Topic: Eating Patterns, Food Groups
Sub Topic: Fruits
Attachment: Y
Comment: The Consumer Brochure should discourage the consumption of heavily processed foods and encourage the consumption of fresh, whole foods.

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

Comment ID: 000693
Submission Date: 10/25/2009
Organization Type: Educational Institution
Organization Name: Kansas State University
First Name: Svetlana
Last Name: Cotelea
Job Title: graduate student
Key Topic: Eating Patterns, Food Groups
Sub Topic:
Attachment: N
Comment: Please consider more emphasis on liquid calorie intake, which has a significant influence on weight gain. There is a great need to educate people to make smart beverage
choices.
Addressing the consumption of fruits and vegetables, it would be beneficial to encourage people to start every meal with vegetables or fruits. This practice has a lot of positive effects (keeps portions naturally under control, controls the absorption of fats and carbohydrates from the food that follows, increases the nutrient and fiber intake) and the
formation of such a habit among Americans can help in reducing the obesity rates.
Thank you.
Comment ID: 000729
Submission Date: 10/28/2009
Organization Type: Educational Institution
Organization Name: Kansas State University
First Name: Melissa
Last Name: Taylor
Job Title: Student
Key Topic: Eating Patterns, Food Groups, Other
Sub Topic:
Attachment: Y
Comment: Discussing some of the vague areas actual portion size by using examples and diagrams to make the document more "public friendly?. The aspects of adding more information on fast food and restaurant choices to aid for a more realistic diet in today's busy world.

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

Comment ID: 000611
Submission Date: 09/08/2009
Organization Type: Educational Institution
Organization Name: Lowcountry Prep School
First Name: Nicole
Last Name: Cyr
Job Title: Student
Key Topic: Eating Patterns, Food Groups, Other
Sub Topic: MyPyramid
Attachment: N
Comment: Our new Dietary Guidelines should involve different sections for age. We should have one pyramid for children, one for adults, and one for the elderly (or possibly even more). This is because at different ages, people have different needs. For example, a small child and an aged person both need more calcium in their diets for the development/maintaining of their bones than a young adult needs.
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

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

Comment ID: 000687	
Submission Date: 10/25/2009	
Organization Type: Educational I	nstitution
Organization Name: Kansas State	e University
First Name: Abigail	
Last Name: Bauer	
Job Title: MPH Student	
Key Topic: Fats, Food Groups, C	Other
Sub Topic: Milk, Other, Trans fat	ty acids
Attachment: Y	
Comment: Additions to the 2010 D	Dietary Guidelines should include the following topics:
1) Recommendations t	hat are more suitable for individuals who cannot or choose not to consume dairy products. More emphasis should be placed on alternative sources of
calcium.	vel of transferts in a visitional labola
	vel of trans-fats in nutritional labels. ducating consumers about the nutritional implications of fast food and restaurant dining.
Comment ID: 000688	about these topics in the attached letter.
Submission Date: 10/25/2009	
Organization Type: Educational I	nstitution
Organization Name: KSU	
First Name: Ann	
Last Name: LeBlanc	
Job Title: Student	
Key Topic: Food Groups	
Sub Topic:	
Attachment: N	
concern and how we ca when helping younger	bers, tary Guidelines of Americans 2005, I noticed a key concern that doesn't seem so clear. The amount of children becoming obese/overweight is my biggest an help them. When we look at the food groups, it talks about the best foods to eat, and how ever many servings you are supposed to consume. However, children especially who are obese, and need to limit their fat intake,they need to know what a healthy portion size is by comparing their fist or physical g to the amount they should eat. Helping a child learn how to eat a certain food in moderation cannot be done by ounces or only eating a certain percent of

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

Key Topic: food groups

fat each day. We need to find a more specific way to help children know when they have had the amount they need for their serving. We can help prevent obesity if we start healthy with the child learning better eating habits. Servings and portions are not only good for adults to be aware of.

Comment ID: 000735
Submission Date: 10/28/2009
Organization Type: Educational Institution
Organization Name: KSU
First Name: Tamara
Last Name: Lovett
Job Title: Student
Key Topic: Food Groups
Sub Topic:
Attachment: Y
Comment: A Plant based diet needs to be emphasized for the health of the people and the environment, also a decrease in the amount of calories used as a general reference which will also decreased recommended serving amounts from the different food groups.
Comment ID: 000700
Submission Date: 10/26/2009
Organization Type: Educational Institution
Organization Name: Kansas State University
First Name: Ann
Last Name: Scheufler
Job Title: Undergraduate Student, Dietetics
Key Topic: Food Groups
Sub Topic: Vegetables
Attachment: Y
Comment: Please see the attached document for my comments on the subcategories of vegetables.

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

Key Topic: food groups

Comment ID: 000646
Submission Date: 09/22/2009
Organization Type: Educational Institution
Organization Name: University of North Carolina at Asheville
First Name: Shannon
Last Name: Worley
Job Title:
Key Topic: Food Groups
Sub Topic: Fruits, Grains, Whole grains, Vegetables
Attachment: Y
Comment: I am writing to ask for a review on suggestions to the 2010 Dietary Guidelines committee. Suggestions are as follows: Provide Plant-Based Vegetarian Dietary Guideline Supplement, List other Protein and Calcium-Rich non-Dairy Options, and Focus on Whole or Raw Foods. Thank you for your time.
Comment ID: 000599
Submission Date: 08/31/2009
Organization Type: Educational Institution
Organization Name: Baylor College of Medicine
First Name: Theresa
Last Name: Nicklas
Job Title: Professor
Key Topic: Food Groups
Sub Topic: Other
Attachment: Y
Comment: August 31, 2009
To: 2010 Dietary Guidelines Advisory Committee

Dairy foods contribute essential nutrients to the diet and their intake may decrease the risk of certain chronic diseases. However, some individuals may limit or completely avoid consuming dairy foods and their nutrients due to self-perceived lactose intolerance. Avoiding dairy foods may have long-term deleterious effect on diet quality, bone metabolism and strength as well as overall health.

According to the National Institute of Diabetes and Digestive and Kidney Diseases (NIDDK), between 30 and 50 million American have the potential for lactose intolerance symptoms based on previously reported lactose maldigestion studies. However, because not all lactose maldigestors experience the symptoms of lactose intolerance, the

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

Key Topic: food groups

prevalence rates of lactose intolerance in practical life settings may be lower. The goal of the attached study, accepted into Nutrition Today, was to determine the prevalence of self-reported lactose intolerance among a national sample of European American (EA), African American (AA), and Hispanic American (HA) adults. These results indicate that the national prevalence of self-reported lactose intolerance is significantly lower than what has been previously estimated.

Any committee making public health dietary recommendations needs to be aware of the misrepresentation of currently estimated lactose intolerance rates. Therefore, it is important that this new research be brought to the attention of the 2010 Dietary Guidelines Advisory Committee and be added to the evidence based library and included as part of the evidence based review process.

Respectively,

Theresa A. Nicklas, DrPH

Comment ID: 000534

Submission Date:06/25/2009Organization Type:Educational Institution

Organization Name: UMKC School of Dentistry - Library

First Name: Tracey

Last Name: Hughes

Job Title: Instructional Resources Librarian

Key Topic: Food Groups

Sub Topic: Other

Attachment: N

**Comment:** At our library, we have materials that the dental students use to educate the community on good oral health habits. One of the topics that the dental students discuss is the effects of good nutrition on oral health & hygiene. I haven't found very many materials that focus specifically on the connection between good (or bad) nutritional habits and oral health & hygiene. It would be great if the USDA were to create such materials, either on their own or in conjunction with another government agency, or even in cooperation with the American Dental Association. Thank you for your time.

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

Key Topic: food groups

Comment ID	000577
Submission	Date: 08/14/2009
Organizatio	n Type: Educational Institution
Organizatio	n Name:
First Name:	MaryAnne
Last Name:	Drake
Job Title:	Professor
Key Topic:	Food Groups, Nutrient Density/Discretionary Calc, Other
Sub Topic:	
Attachment	
Comment:	Food choice and preference play a critical role in consumer decisions and the nutrients that they consume. Please keep in mind taste preferences when formulating new dietary guidelines. The attached study has been peer-reviewed and is currently accepted for publication in the Journal of Sensory Studies.
Comment ID	
Submission	Date: 05/21/2009
Organizatio	n Type: Educational Institution
Organizatio	n Name: Department of Animal Sciences, Washington State University
First Name:	Jude
Last Name:	Capper
Job Title:	Assistant Professor of Dairy Science
Key Topic:	Food Groups, Other, Protein
Sub Topic:	Meat, Beans, Eggs, Fish, and Nuts, Other
Attachment	: Y
	U.S. milk and meat industries have made huge improvements in efficiency over the past 60 years, enabling more safe, wholesome, affordable food to be produced using fewer resources. However, anti-animal agriculture groups often deliberately misrepresent the conclusions of a recent FAO report, suggesting that U.S. livestock production is a significant contributor to greenhouse gas production, despite the report's conclusion that improving efficiency is key to mitigating climate change. When assessing environmental impact, it is essential to compare U.Sspecific EPA data (stating that livestock production only contributes 2.8% of U.S. greenhouse gas emissions) with the oft-quoted FAO

global estimates (18%) and to make dietary recommendations accordingly.

Submission Date Between 04/24/2009 and 10/28/2009 Key Topic: food groups

Comment ID: 000526
Submission Date: 06/09/2009
Organization Type: Individual/Professional
Organization Name:
First Name:
Last Name:
Job Title:
Key Topic: Eating Patterns, Evidence-based Review Process, Food Groups
Sub Topic:
Attachment: N
Comment: Many Americans look to the guidelines set by the USDA and those who strictly follow these very guidelines will continue to suffer the ill health effects of poor nutritional choices.
Speaking from personal experience, I ate a diet based upon the food pyramid throughout my formative years. After years of battling weight gain, bad skin, and generally poor health, I chose to go against my family's wishes and try vegetarianism. I would have appreciated greater guidance in making that choice as an adolescent. After 15 years of being a vegetarian (with 5 of those as a vegan), I cannot underscore enough the importance of the USDA giving due attention to the wealth of evidence of a lower calorie, plant-based diet.
I came to the nutrition.gov site today to check out the meal planner and was faced with the unimaginable: returning to a time of eating poorly (e.g., it recommended that I eat 2400 calories!).
As a layperson, I know that my experiences are not unique. The committee will again do a community disservice to publish similar recommendations to the 2005 standards. <b>Comment ID:</b> 000519
Submission Date: 06/01/2009
Organization Type: Individual/Professional
Organization Name:
First Name: Jennifer
Last Name: Shu, MD
Job Title: Pediatrician
Key Topic: Eating Patterns, Evidence-based Review Process, Food Groups, Minerals, Nutrient Density/Discretionary Calc, Protein, Vitamins
Sub Topic: B Vitamins, Iron, Magnesium, Meat, Beans, Eggs, Fish, and Nuts, Potassium, Zinc
Attachment: Y
Comment: As a pediatrician concerned about the health and well-being of children, I would like to share my thoughts regarding the role of animal protein products (meat, fish, eggs) in child health. There are not sufficient data to support a recommendation to replace animal protein with plant protein in the diet of children and adolescents. It is important for the DGAC

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

Key Topic: food groups

to acknowledge that beef provides a unique mixture of highly bioavailable micronutrients, not readily available in plant-based diets, that support the cognitive development and function of children and adolescents. Caution should be taken to avoid the establishment of protein source recommendations that inappropriately restrict animal protein in the diets of children and adolescents.

Comment ID: 000555
Submission Date: 07/22/2009
Organization Type: Individual/Professional
Organization Name: Bush Brothers & Company
First Name: Sara
Last Name: Rose
Job Title: Vice President
Key Topic: Eating Patterns, Food Groups
Sub Topic: Meat, Beans, Eggs, Fish, and Nuts, MyPyramid, Vegetables
Attachment: Y
Comment: Research shows that the current terminology used in Dietary Guidance to describe "beans" is confusing to consumers and excludes the forms that are most commonly consumed. An evaluation of 6 different descriptive terms for beans shows that consumer understanding of beans can be greatly improved, thus removing a barrier to greater bean, and vegetable consumption.
Comment ID: 000636
Submission Date: 09/22/2009
Organization Type: Individual/Professional
Organization Name: UNCA student in Food Politics and Nutrition Class
First Name: Danielle
Last Name: Earley
Job Title: Cashier
Key Topic: Eating Patterns, Food Groups
Sub Topic: Other
Attachment: Y
Comment: Why there is a need for clearer guidelines in order to assist individuals in choosing appropriate food choices.

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

Comment ID: 000673
Submission Date: 10/15/2009
Organization Type: Individual/Professional
Organization Name:
First Name: Jess
Last Name: B.
Job Title:
Key Topic: Eating Patterns, Food Groups
Sub Topic: MyPyramid
Attachment: N
Comment:       As an American trying to balance my diet properly, I agree with the author of Comment ID: 000124, written by dietitian Melissa Baumann. The 2005 Food Pyramid is my current food plan, yet the equivalent ounces/cups is unmanageable because the equivalent measure information is confusing and incomplete. "Equivalent cups/ounces" confuses the user more than "portion/serving".         Also, I would like to see unprocessed food equivalents listed comprehensively. As a vegetarian, I use shelled edamame as a complete protein source to avoid using high-fat alternatives such as nuts and nut butters. Edamame is not in the food plan program (only soy nuts). The foodapedia page is broken, so if it's there, I cannot access it. I can find processed foods on the My Pyramid Meal Planner list, like dry, boxed Macaroni and Cheese. I don't understand why, when processed foods are vilified, any unprocessed food is overlooked.         I would like to see a relative calorie equivalent breakdown by food group, if possible, so I can use that if what I'm eating isn't on "the USDA list". Also, comprehensive lists of unprocessed foods from around the world by portion would be appreciated.         Also, I am disappointed legumes and starchy vegetables were reclassified as "vegetables". Legumes are a protein; starchy vegetables, a "grain". The vegetables that nutritionists want us to eat are high-fiber and low calorie. Putting legumes and starchy vegetables in there gives average Americans a free pass to avoid dark, leafy greens.         Comment ID:       000678
Submission Date: 10/20/2009
Organization Type: Individual/Professional
Organization Name:
First Name: Erin
Last Name:
Job Title:
Key Topic: Eating Patterns, Food Groups, Food Safety
Sub Topic:
Attachment: N
Comment: The current daily recommendation to eat at least 6 servings of grains (including processed foods) encourages the consumption of genetically modified organisms (mostly in the form of corn or soy) which have not been sufficiently tested and are not required to be labeled. The focus of the food pyramid should be on encouraging consumption of fruits,

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

Key Topic: food groups

vegetables, and whole grains; highly processed and refined grains (e.g. breakfast cereals, breads, cookies, crackers, etc.) should be consumed sparingly, if at all. The USDA recommendations should not be influenced by the special interest groups representing the corn/soy, meat, dairy, and fast food industries.

Comment ID: 000539
Submission Date: 06/30/2009
Organization Type: Individual/Professional
Organization Name: Exponent Inc. Health Sciences
First Name: Dominik
Last Name: Alexander, PhD, MSPH
Job Title: Senior Managing Epidemiologist
Key Topic: Evidence-based Review Process, Food Groups
Sub Topic: Meat, Beans, Eggs, Fish, and Nuts
Attachment: Y
Comment: Lack of scientific consensus for red meat and cancer in the WCRF/AICR report.
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
According the the USDA Nutriant Database, between 1002 and 2008, total fat for the outlined park cuts has decreased by 20-36% and saturated fat has decreased by 22-41%.

**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.

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

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Comment ID: 000490
Submission Date: 05/06/2009
Organization Type: Individual/Professional
Organization Name: Nutrition Solutions
First Name: Lynda
Last Name: Warringer
Job Title: registered dietitian
Key Topic: Food Groups
Sub Topic: Fruits, Grains, Whole grains, Milk, Vegetables
Attachment: N
Comment: Please consider using the same portion sizes for the diabetics vs non diabetics. The public has a right to know the true calories for a portion size.
Please consider including the absorption ability of high calcium foods when mixed with foods containing fat, oxalates and fiber. Many colorful pictures in the food pyramid partner blueberries with milk or yogurt as a good nutrition source. scientific evidence reveals the oxalates in blueberries prevents calcium absorption. this is one example there are many others
Submission Date: 08/25/2009
Organization Type: Individual/Professional
Organization Name: Food, Nutrition & Health Communications
First Name: Betsy
Last Name: Hornick
Job Title: Nutrition Consultant/Writer
Key Topic: Food Groups
Sub Topic: Meat, Beans, Eggs, Fish, and Nuts, Vegetables
Attachment: Y
Comment: As the Committee evaluates the current Food Group designations, we urge the Committee to keep beans in both the Meat & Beans group and the Vegetable group. Dividing certain foods within the Meat & Beans group into two new groups could have the unintended consequence of Americans not meeting needs for key nutrients such as protein, iro and B vitamins, while possibly increasing intake of total and saturated fat. In addition, research shows that beans, nuts, and seeds are not interchangeable in how they are

consumed by Americans-- and these foods are different in their nutrient profiles. Lastly, food group assignments should be logical and consistent over time, and messages and guidelines need to be continually reinforced to help improve consumer compliance of the Dietary Guidelines for Americans and MyPyramid. With fewer than 4% of Americans following the Dietary Guidelines, now is not the time to add more confusion by creating new food groups and daily recommendations that may ultimately lead to more nutrient shortfalls in American diets, and that do not reflect how consumers eat.

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

Comment ID: 000621
Submission Date: 09/14/2009
Organization Type: Individual/Professional
Organization Name:
First Name:
Last Name:
Job Title: Dietitian
Key Topic: Food Groups
Sub Topic: Meat, Beans, Eggs, Fish, and Nuts
Attachment: N
Comment: Several studies and reviews of studies show a relationship between population groups and vegetarian / vegan diets in regards to the prevalence of overweight and obesity. The correlation between overweight/obesity and chronic disease, including heart disease, stroke, and cancer, cannot be overlooked. The "Guidelines" needs to seriously consider the consequences of a high protein, high fat diet (mainly in the form of meat and processed meat products) and should stress the adoption of a plant-based or semi plant-based diet that greatly reduces the consumption of meat products.
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
<b>Comment:</b> 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.

Submission Date Between 04/24/2009 and 10/28/2009 Key Topic: food groups

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: 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.

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

Key Topic: food groups

Comment ID: 000499
Submission Date: 05/21/2009
Organization Type: Industry Association
Organization Name: California Dried Plum Board
First Name: Richard
Last Name: Peterson
Job Title: Executive Director
Key Topic: Food Groups
Sub Topic: Fruits
Attachment: Y
Comment: On behalf of the California Dried Plum Board (CDPB), we thank you for the opportunity to submit written comments to the 2010 Dietary Guidelines Advisory Committee (DGAC). The CDPB is a California marketing organization representing California growers and processors of dried plums, who pay assessments to support communication, education and scientific research. California produces over 50% of the world's dried plum supply.
We commend the efforts undertaken by the Department of Agriculture (USDA), the Department of Health and Human Services (HHS), and members of the DGAC to conduct an evidence-based review and update of the current Guidelines. As the DGAC continues to review the evidence for development of the 2010 Dietary Guidelines for Americans, we would like to highlight some key findings related to the role of dried plums in some of the most pressing dietary issues facing Americans today. More details and references are on the attached document.
Dried plums can help overcome the shortfall of needed nutrients and foods. Dried plums can help manage weight. Dried plums promote heart health. Dried plums promote bone health. Dried plums can offer meat processors natural solutions to several meat industry needs, beyond improved nutritional profile. Dried plums promote digestive health. Dried plums promote digestive health. Children enjoy dried plums.

The CDPB appreciates this opportunity to provide comments to the DGAC as the Committee continues its important work. We hope that you consider this body of evidence on dried plums during your deliberations, and recognize the benefits of dried plums in dietary guidance advice.

Submission Date Between 04/24/2009 and 10/28/2009 Key Topic: food groups

Comment ID: 000584
Submission Date: 08/18/2009
Organization Type: Industry Association
Organization Name: California Raisin Marketing Board
First Name: Gary
ast Name: Schulz
ob Title: President/General Manager
Key Topic: Food Groups
Sub Topic: Fruits
Attachment: Y
Comment: Comment is attached as PDF.
Comment ID: 000602
Submission Date: 09/01/2009
Organization Type: Industry Association
Organization Name: Tomato Products Wellness Council
First Name: Rodger
ast Name: Wasson
ob Title: Program Coordinator
Key Topic: Food Groups
Sub Topic: Vegetables
Attachment: Y
Since tomatoes are the number one consumed non-starchy vegetable and a significant source of nutrients in the American diet, they should be positioned in a new ?Red? vegetable category rather than just ?Other.? Currently, tomato products are listed in the ?other vegetables? category within MyPyramid?s vegetable section. As with other highlighted vegetable groups in this section like ?dark green? and ?orange?, tomato products should be highlighted into a ?red? vegetable category based on higher levels of lycopene and high consumption levels. Consumed more than any non-starchy vegetable and greater than the total ?Orange? category, tomatoes in all forms should be in a

?Red? category.

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

Key Topic: food groups

Comment ID: 000603
Submission Date: 09/02/2009
Organization Type: Industry Association
Organization Name: Sunsweet Growers, Inc
First Name: Katherine
Last Name: Beals
Job Title: Nutrition Consultant
Key Topic: Food Groups
Sub Topic: Fruits
Attachment: Y
fiber, vitamin C, potassium and iron), is associated with an increase in whole fruit consumption and can improve diet quality. Moreover, despite popular belief, the bulk of the scientific literature indicates that the consumption of 100% fruit juice is NOT associated with an increase in body weight or an increased risk for obesity.  Comment ID: 000605
Submission Date: 09/04/2009
Organization Type: Industry Association
Organization Name: California Dried Fruit Coalition
First Name: Judy
Last Name: Hirigoyen
Job Title: Executive Director
Key Topic: Food Groups
Sub Topic: Fruits
Attachment: Y
Comment: Per serving, traditional dried fruit is nutritionally comparable to fresh fruit. Its simplicity, affordability and year-round availability make it an important staple in the American diet.

Current DGAs recommend dried fruit.

Dietary Guidelines for Americans 2005 recognize dried fruit as nutritionally comparable to other forms (canned, frozen, fresh), adjusting the recommended serving sizes to account for the concentration that occurs naturally when dried. We appreciate that the current DGA includes dried fruit as a particular source of certain important nutrients, such as potassium, iron and dietary fiber in its Appendix: Food Sources of Selected Nutrients.

Dried fruit is convenient, affordable and always in season.

Now more than ever, Americans are looking for simple and economic ways to improve their diets. Dried fruit is easy to incorporate into every meal, a wholesome snack food, and

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

Key Topic: food groups

with less waste than fresh, it can aid in increased fruit consumption at home. Dried fruit assures that a fruit choice is always available when maintained as a pantry staple. Dried fruit is beneficial in the diets of special populations.

Dried fruit serves the needs of special populations, as described in this submission. Older adults, women of reproductive age and children especially benefit from dried fruit, according to research we cite. In the fight against obesity, a shift to more healthful diets must occur and the NHANES (1999-2004) data shows that diets high in dried fruits (approximately two servings per week) are associated with lower BMI, reduced overweight and obesity. Moreover, institutional settings and schools appreciate dried fruit for its ease of storage and preparation.

Dried fruit has a long history of food safety.

There is no known incident of a food-borne illness related to dried fruit, due to its lower moisture content, high drying and processing temperatures, and the very high priority our farmers, packers and shippers place on food safety.

#### **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:

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

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

Key Topic: food groups

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.
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.

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

Comment ID:	000628
Submission Da	ate: 09/20/2009
Organization T	Type: Nonprofit/Voluntary
Organization N	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:	
	urrent USDA dietary guidelines are unrealistic, unworkable, unscientific and impractical; they have resulted in widespread nutrient deficiencies and contributed to a proliferation obesity and degenerative disease, including problems with growth, behavior and learning in children.
ca rep	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 uses 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 place 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, burological 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:	
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; 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.
	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 d D.
	void: foods containing refined sweeteners such as candies, sodas, cookies, cakes; white flour products; processed foods; modern soy foods; polyunsaturated and partially drogenated vegetable oils.

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

Comment ID: 000594
Submission Date: 08/24/2009
Organization Type: Nonprofit/Voluntary
Organization Name: International Tree Nut Council Nutrition Research & Education Foundation
First Name: Maureen
Last Name: Ternus
Job Title: Executive Director
Key Topic: Food Groups
Sub Topic: Meat, Beans, Eggs, Fish, and Nuts
Attachment: Y
Comment: Third set of comments on nuts and health to the DGAC from the International Tree Nut Council Nutrition Research & Education Foundation (see attached comments)
Comment ID: 000525
Submission Date: 06/08/2009
Organization Type: Nonprofit/Voluntary
Organization Name: Luv-it Wellness, Inc
First Name: Gloria
Last Name: Lovett
Job Title: Director/Health Educator
Key Topic: Food Groups
Sub Topic: Other
Attachment: N
Comment: I would like to recommend that water be added to the food pyramid so that children will learn to recognize the importance of drinking water daily.

Submission Date Between 04/24/2009 and 10/28/2009 Key Topic: food groups

Comment ID: 000740
Submission Date: 10/28/2009
Organization Type: Nonprofit/Voluntary
Organization Name: Life Sciences Research Office
First Name: Michael
Last Name: Falk
Job Title: Executive Director
Key Topic: Food Groups
Sub Topic:
Attachment: Y
Comment: Comments are attached in a zip file
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.

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

Comment ID: 000496			
Submission Date: 05/15/2009			
Organization Type: Other			
Organization Name:			
First Name: Ardelia			
Last Name: Johnson			
Job Title: Secretary			
Key Topic: Eating Patterns, Energy Balance/Physical Activity, Food Groups, Other			
Sub Topic: Fruits, Vegetables, Weight loss			
Attachment: N			
Comment: I had high blood pressure and have osteoarthritis. I was told to loose weight from my physicians. I tried all the fad diets- Atkins made me constipated and the grapefruit diet, it made me oversize with food after I had enough of grapefruits. I went to the food pyramid guide and followed its instructions to eat more fruits, vegetables, grains, and milk. It was easy and I never ate healthy all my life I am 47 years old. To my amazement, I lost 10 pounds in 3 weeks by following the food pyramid guide. Controlling ones weight loss is really simple - eat healthy. It is just that simple. Thank you all so, very, very much. With Love.			
Comment ID: 000658			
Submission Date: 09/28/2009			
Organization Type: Other			
Organization Name: ConAgra Foods			
First Name: Mark			
Last Name: Andon			
Job Title: Vice President, Nutrition and Food Labeling			
Key Topic: Eating Patterns, Food Groups			
Sub Topic: MyPyramid			
Attachment: Y			
<b>Comment:</b> ConAgra Foods would like to encourage the Dietary Guidelines Advisory Committee (DGAC) to maintain the current USDA Food Guide and thus maintain the integrity of the current MyPyramid graphic. MyPyramid is not intended to replace the Nutrition Facts Panel. The Nutrition Facts Panel can provide the additional nutrition information consumers may need to meet their individual dietary needs. Maintaining the simplicity of MyPyramid as a food based system, not a nutrient based system, best supports progress toward more Americans adopting MyPyramid eating patterns. ConAgra Foods supports continuing private-public partnerships as an effective means of leveraging limited resources to increase awareness and use of the current MyPyramid, and ultimately, of improving American's diets.			

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

Comment ID: 000742
Submission Date: 10/28/2009
Organization Type: Other
Organization Name: The Kellogg Company
First Name: Nelson
Last Name: Nelson Almeida, PhD, FACN
Job Title: VP, US/Global Nutrition Science, Labeling & Marketing
Key Topic: Eating Patterns, Food Groups, Nutrient Density/Discretionary Calc
Sub Topic: Grains, Whole grains, MyPyramid
Attachment: Y
Comment: The Kellogg Company has a longstanding commitment to health and nutrition, dating back to its founding in 1906. The attached comments focus on the importance of both breakfast and snack time as two underutilized eating occasions that are associated with many health benefits. Included within the comments and as an appendix are summarie of research since 2005 that highlight benefits of breakfast and snacking as they relate to nutrient adequacy.
Based on this summary, we suggest that the 2010 Dietary Guidelines reinforce the importance of dietary meal patterns and eating nutrient-rich breakfasts and snacks in order t achieve one?s daily MyPyramid goals for food groups and essential nutrients. Additionally and in light of more recent research, we reiterate comments submitted last June suggesting more of an emphasis on fiber in the 2010 Dietary Guidelines given its importance for public health.
We appreciate the DGAC's consideration of these comments as they deliberate their recommendations for the 2010 Dietary Guidelines for Americans.
Comment ID: 000746
Submission Date: 10/28/2009
Organization Type: Other
Organization Name:
First Name: Scott
Last Name: Present
Job Title:
Key Topic: Food Groups
Sub Topic:
Attachment: N
Comment: Current guidelines, while encouraging consumption of whole fruits, nevertheless equates certain 100% fruit juice (i.e. apple) with consuming the fruit itself.
Phytonutrients are significantly more concentrated in the skin or peel of the fruit than the fruit juice, regardless of the fruit in question.

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Key Topic: food groups

Therefore, the health benefits of drinking 100% fruit juice will not result in similar health benefitrs of eating the whole fruit because these phytonutrients within the skin or peel are not being consumed.

Moreover, the vitamins added back to 100% fruit juice after processing and pasteruization are commercially produced vitamins; they do not have the co-factors and enzymes that produce the still little understood synergy that produces a health benefit based upon the interraction of these various compounds working together, as oppossed to the commercially produced vitamin acting alone.

Therefore, please consider eliminating the current equiavlence of 1/2 cup 100% fruit juice with eating a whole fruit, as it is misleading to the American consumer.

Comment ID: 0	000649
Submission Date	te: 09/23/2009
Organization Ty	ype: Other
Organization Na	ame: Sun-Maid Growers of California
First Name: Ari	rianna
Last Name: Ca	arughi
Job Title: He	lealth & Nutrition Research Coordinator
Key Topic: Fo	ood Groups
Sub Topic: Fru	ruits
Attachment: Y	
Ms. 0 Co-E Dieta Cent U.S. 3101 Alex Dear Sun Maid cons Curr mee the s We bioar cons	tember 16, 2009 Carole Davis Executive Secretary tary Guidelines Advisory Committee ter for Nutrition Policy and Promotion 5. Department of Agriculture 11 Park Center Drive, Room 1034 xandria, VA 22302 ar Ms. Davis: 

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

Key Topic: food groups

Arianna Carughi, Ph.D., C.N.S. Health & Nutrition Research Coordinator

Attachment

Comment ID: 000683
Submission Date: 10/23/2009
Organization Type: Professional Association
Organization Name: National Medical Association
First Name: Cheryl
Last Name: Dukes
Job Title: Director
Key Topic: Food Groups
Sub Topic: Milk
Attachment: Y
<ul> <li>Comment: The National Medical Association (NMA) is dedicated to promoting the health and well being of African Americans. As the 2010 Dietary Guidelines Advisory Committee looks to develop nutrition guidance, we hope you will consider the information in the attached NMA report: Lactose Intolerance and African Americans: Implications for the Consumption of Appropriate Intake Levels of Key Nutrients.</li> <li>Research shows that African Americans may be at risk of nutrient deficits as a result of under-consumption of dairy products due to perceived lactose intolerance. According to an NMA study, 85 percent said they would add more milk and dairy to their diet if they could avoid the symptoms. This report provides the strategies to help make dairy foods easier to digest.</li> <li>Due to its nutrient-rich package, the consumption of dairy products may play a unique role in preventing many diseases. Studies suggest that the nutrients in dairy products intermediate hypertension, obesity, and other medical conditions with high prevalence rates among Americans in general, and African Americans in particular. This report includes research about the risks for nutritional deficiencies associated with lactose intolerance.</li> <li>As you develop nutrition guidance, we hope you will consider the research and important findings included in this report to address lactose intolerance for African Americans. Thank you for the opportunity to submit this report and comments for your consideration. Please feel free to contact NMA should you need further information.</li> </ul>