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**2015 Dietary Guidelines Advisory Committee Report**

**To,**

**The Secretaries of Health and Human Service and U. S. Department of Agriculture**

**Public Testimony of:**

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I'm Dr. Courtney Gaine, Vice President of Scientific Affairs with the Sugar Association.

The Association has participated in the Dietary Guidelines process since its inception and appreciates the hard work of the Advisory Committees and Federal staff. We support recommendations to reduce certain foods and beverages containing added sugars to within caloric needs. However, for the 2015 process, the Committee has taken added sugars recommendations to uncharted territory, raising serious concerns about timing, consistency and potential biases.

Sugars guidance has appeared in every version of the Guidelines and added sugars intake is a major topic of scientific debate. So, we ask how is it possible that this important topic wasn't addressed early in this process. The Added Sugars Working Group wasn't formed until September 2014. After decades of debate, two months' time is certainly not long enough to adequately evaluate this important body of research.

Yet, this short duration of time seems to be the explanation as to why the Working Group conducted only *one* Nutrition Evidence Library (NEL) review to inform its four conclusions on added sugars, despite the known importance of the NEL process to reducing bias and increasing transparency and ensuring that all literature is considered. For the other three questions, the Working Group hand-picked pre-existing systematic reviews to develop its recommendations – which happen to be dramatically different from not only the 2010 Guidelines but also contradict findings of major scientific reviews by authoritative organizations.

When only pre-existing reviews are used, the Committee is entirely basing its conclusions on research questions, search criteria, study quality, and evaluations determined, not by the Committee themselves, but by those reviews' authors. As such, the Committee is not privy to all of the limitations and design elements of the studies included in these reviews and, even when available, the Committee in its report ignored many of the limitations and qualifying statements that are found in these reviews.

We attest that systematic reviews are helpful research tools but should not be used as the sole basis for strong dietary recommendations. There are several published papers raising this issue, given biases and errors inherent to conducting these analyses and that findings from meta-analyses on the same topic often contradict each other.

We contend that consistent use of NEL reviews, such as performed in 2010, would have ensured that *all* studies were given consistent, transparent and unbiased consideration. But, instead, the 2015 process raises concerns that the Committee selected science to support its pre-determined conclusions.

Dietary guidance that links any food ingredient with a serious disease outcome should only be the result of a robust review of the entire body of scientific evidence by experts in the field of investigation.

The 2015 Dietary Guidelines Advisory Committee recommendations for added sugars are not based on the preponderance of new scientific information; therefore, we request the Secretaries maintain the 2010 Dietary Guidelines on added sugars.

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