



Dietary Guidelines Too Important Not to Get Right

ON JAN. 7, AFTER MONTHS OF CONTROVERSY, THE DEPARTMENTS OF HEALTH AND HUMAN SERVICES AND AGRICULTURE JOINTLY RELEASED THE 2015 DIETARY GUIDELINES FOR AMERICANS (DGAs), AS THEY DO EVERY FIVE YEARS.

Each time the DGAs are released, the same question is raised: Do these guidelines have any impact on improving the diet and health of Americans?

In truth, if one were to plot the data you'd find an association showing quite the opposite impact.

There is no doubt that added sugars are the latest dietary target of the media, bloggers, consumer groups, the Food and Drug Administration and now the DGAs. As with eggs, butter and the low-fat era of the 1990s, to name just a few examples, dietary guidance not based on sound scientific principles and rigorous investigation not only results in chaos and potential harm to the food industry but, more importantly, raises questions as to whether our obsession with focusing on individual dietary components backfires as a public health intervention.

While most Americans don't follow these guidelines, or even know what they are, the impact of the messages they contain cannot be underestimated. One fact many people may not realize is that the DGAs are the basis for all federal nutrition educational efforts and in some cases nutrition policy. For example, Congress requires that the school lunch and breakfast programs follow the DGA recommendations. Quite simply, they are too important for us not to get them right.

A bit of background: since 1985, HHS and USDA have established a Dietary Guidelines Advisory Committee (DGAC) to inform the final DGAs. This committee is responsible for evaluating the science and submitting a report to the secretaries recommending changes when new

evidence from the previous guidance justifies such. This DGAC report is then used to inform the final DGAs, written by the secretaries. However, the 2015 DGAC went far beyond its charge, with several recommendations falling outside of the scope of science. This ignited a firestorm of controversy, generating the submission of more than 29,000 public comments on its report in a process where around 1,500 comments is the norm.

Concerns were also raised regarding how the 2015 DGAC selected and evaluated the scientific evidence. The committee bypassed the established Nutrition Evidence Library process that is set up to include the full body of scientific evidence for objective and systematic evaluation and, instead, cherry-picked from already published systematic reviews to support its clearly predetermined conclusions. This unorthodox evaluation of the science, coupled with its recommendations for changes in federal policies that were outside the scope of its charge, led to concerns that the recommendations in this report were agenda-based, not science-based.

This fall, Congress stood up and acknowledged that the scientific integrity of the process is in question and, in recognizing the need to ensure consumer trust, funded a \$1 million mandate in the Omnibus Spending Bill that the National Academy of Medicine (NAM) review the entire Dietary Guidelines process.

However, despite how controversial a given DGAC report may be, it is ultimately up to the secretaries to ensure that the final DGAs adhere to the congressional mandate requiring any new recommendations be based solely on the preponderance of scientific evidence. So when the official DGAs were released Jan. 7, many of the most controversial 2015 DGAC recommendations were omitted or scaled back.

So why did the 2015 DGAC

recommendation to limit added sugars intake to 10 percent of daily calories remain, despite the fact this recommendation was based on science of low evidentiary value, such as food modeling?

It's hard not to conclude that it might have something to do with FDA's recent Proposed Rules to require added sugars appear on the Nutrition Facts Label and to set a percentage Daily Value for added sugars of 10 percent. FDA also went rogue with its process, bypassing its typical reliance on the NAM to set intake recommendations (among other irregularities in its proposal). There was undoubtedly pressure on the secretaries to ensure the DGAs did not go against what FDA had laid out; thus, no surprise that the 10 percent limit remained in the final DGAs.

It should be stated that we agree with the new DGAs' emphasis on healthful dietary patterns and the recognition that any food or beverage, including sweetened foods and beverages that don't contribute nutritional value, should be consumed as treats within caloric needs. But the first ever quantified limit on added sugars is scientifically out of bounds. If examined closely, the studies used by the DGAC in its report don't actually support this 10 percent recommendation. However, in nutrition policy of late, these facts don't seem to matter.

What scientific evidence coupled with centuries of sugar intake does tell us is that that sugar makes many healthful foods palatable, which helps contribute to increased intakes of many essential vitamins and minerals needed to maintain good health. In fact, the 10 percent recommendation for added sugars would bring our intake to a low we haven't seen in the American diet since nutrient deficiencies were a major public health concern—well over half a century ago.

Fundamentally, the problem is the obesity epidemic and its causes and the war against it are as complicated as the human race. It's no surprise that despite billions of dollars in research, no one has the answer. Limits on added sugars are seen as the low hanging fruit—a way to do something—a quick way to cut calories. There's a strong argument against why all of these efforts to limit added sugars will be ineffective at best, and possibly destructive at worst.

Added sugars intake has been on a steep decline over the past 15-to-20 years, yet total caloric intake and obesity rates keep climbing. As a country, our intakes are already only about 50 calories of added sugars away from this new limit. So, when you think of your own diet, and the more than 1,700 calories not coming from added sugars, does it make sense to target only added sugars? Especially when the science doesn't support it?

Nope, it's just the easiest way to look like we're doing something.

Weak scientific evidence is eventually revealed and reversed. Regrettably, in the meantime it continues to result in consumer apathy, distrust and confusion. Americans deserve better. ■

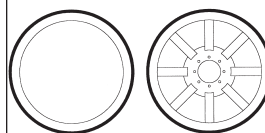
Editor's note: Dr. Gaine is the interim president and CEO of The Sugar Association.

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