U.S. Department of Agriculture

CENTER FOR NUTRITION

POLICY AND PROMOTION

FOOD GUIDANCE SYSTEM

PUBLIC COMMENT MEETING

Thursday, August 19, 2004

Jefferson Auditorium
South Agriculture Building
U.S. Department of Agriculture
14th and Independence Avenue, SW
Washington, DC 20250
<table>
<thead>
<tr>
<th>APPEARANCES/STATEMENTS:</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ERIC J. HENTGES, Panelist and Facilitator</td>
<td>5</td>
</tr>
<tr>
<td>KATE COLER, Panelist</td>
<td>17</td>
</tr>
<tr>
<td>CAROLE DAVIS, Panelist</td>
<td>21</td>
</tr>
<tr>
<td>TRISH BRITTEN, Panelist</td>
<td>24</td>
</tr>
<tr>
<td>ERIC M. BOST, Key Note Speaker</td>
<td>28</td>
</tr>
<tr>
<td>AMY LANOU</td>
<td>33</td>
</tr>
<tr>
<td>CHARLES BAKER</td>
<td>38</td>
</tr>
<tr>
<td>MARY YOUNG</td>
<td>43</td>
</tr>
<tr>
<td>BARBARA BERRY</td>
<td>47</td>
</tr>
<tr>
<td>STUART TRAGER</td>
<td>50</td>
</tr>
<tr>
<td>BILL SANDA</td>
<td>53</td>
</tr>
<tr>
<td>DEAN ORNISH</td>
<td>57</td>
</tr>
<tr>
<td>SUSAN LARAMEE</td>
<td>61</td>
</tr>
<tr>
<td>ALISON KRETSER</td>
<td>50</td>
</tr>
<tr>
<td>SAURABH DALAL</td>
<td>53</td>
</tr>
<tr>
<td>SUE BORRA</td>
<td>57</td>
</tr>
<tr>
<td>JAY LAVINE</td>
<td>61</td>
</tr>
<tr>
<td>Name</td>
<td>Page</td>
</tr>
<tr>
<td>---------------------------</td>
<td>------</td>
</tr>
<tr>
<td>KAREN MILLER-KOVACH</td>
<td>63</td>
</tr>
<tr>
<td>ROBERT EARL</td>
<td>68</td>
</tr>
<tr>
<td>KATHERINE BEALS</td>
<td>72</td>
</tr>
<tr>
<td>LAURA DAWSON</td>
<td>76</td>
</tr>
<tr>
<td>MICHAEL JACOBSON</td>
<td>79</td>
</tr>
<tr>
<td>DAVID KATZ</td>
<td>83</td>
</tr>
<tr>
<td>MAYA EDMONDS</td>
<td>85</td>
</tr>
<tr>
<td>CONNIE DIEKMAN</td>
<td>87</td>
</tr>
<tr>
<td>JENNIFER TONG</td>
<td>90</td>
</tr>
<tr>
<td>EDWARD SIGUEL</td>
<td>95</td>
</tr>
<tr>
<td>ANNETTE DICKINSON</td>
<td>100</td>
</tr>
<tr>
<td>ROBERT SINDT</td>
<td>103</td>
</tr>
<tr>
<td>ANNE BANVILLE</td>
<td>107</td>
</tr>
<tr>
<td>MARTHA LINDGREN MARINO</td>
<td>111</td>
</tr>
<tr>
<td>PHIL PERKINS</td>
<td>115</td>
</tr>
</tbody>
</table>
DR. HENTGES: Good morning. I'd ask everyone to go ahead and get their seats, and we'll get started here in just a minute. Good morning. I'm Eric Hentges, the Executive Director or USDA Center for Nutrition Policy and Promotion. I'd like to welcome you to this public comment meeting, looking at the revisions to the current food guide pyramid.

Our purpose today is very straightforward, very clear. It is to receive public stakeholder input into our development process for revising the current pyramid into a food guidance system. While being straightforward, it is very important, this step of getting this input early on in our process, so that we are able to incorporate it and take advantage of your expertise and your input today.

I'd like to quickly tell you the names of our panel members today. Here to the far right if Kate Coler, and she is Deputy Under Secretary for Food, Nutrition and Consumer Services. Second is Carole Davis, who is Director of the Nutrition Promotion Staff at the Center; and Trish Britten, nutritionist, also at CNPP.

I'd like to go ahead and have our opening comments from Under Secretary Bost. It's my pleasure this morning to introduce to you USDA Under Secretary for Food, Nutrition and Consumer Services, Eric M. Bost.
As Under Secretary, Mr. Bost oversees two agencies: the Food and Nutrition Service, and the Center for Nutrition Policy and Promotion. He is responsible for oversight of USDA's activities involving the Dietary Guidelines, and the food guidance system.

Additionally, he is responsible for administration of the 15 USDA nutrition assistance programs with a combined budget of over $50 billion dollars. These programs include the Food Stamp Program, the WIC program, and the National School Lunch Program.

During his tenure, Under Secretary Bost has made significant progress in furthering the agencies goals of combating obesity and helping needy families and individuals secure a nutritious diet. He has led efforts to support and motivate Americans to make concrete improvements in their diet and physical activity as part of the President's HealthierUS Initiative.

Please join me in welcoming Under Secretary Bost.

MR. BOST: Eric, thank you. Good morning and welcome. On behalf of myself and Secretary Veneman, we are so pleased to have all of you here with us today.

It's unfortunate and also very troubling that we are the fattest people in the entire world. Over 60 percent of all adults in this country are overweight. 30 percent of us are obese. We have seen a doubling and almost tripling
in the number of children in this country that are overweight.

If we were just chubby and happy, it would be one thing. But that's not the case. We've seen a significant increase in the number of adults that are experiencing diabetes, heart disease, cancer. In addition to that, over 400,000 people, over 400,000 people die as a direct result of obesity-related illnesses, soon to surpass the number of people who die as a direct result of smoking in this country.

And if that's not enough for you, we spend over $120 billion, and that's B, billion dollars a year on obesity-related illness in this country, all because we eat too much and we move too little. It sounds simple, but it's not.

That's one of the reasons that we're very happy that you're here. We're happy that you're here because of a couple of things. First and foremost, we believe the government has a very important role in addressing this issue of obesity in this country, and moving Americans toward a healthier lifestyle.

For us, that's the big picture, a healthier lifestyle. But as I said, we believe that we have a very important role to play, but we are not the only player when it comes to addressing this issue. And we cannot do it by
ourselves. We need the media. We need the industry. We need teachers, administrators. We need parents. All of us have a very important role to play in terms of addressing this issue of moving Americans toward a healthier lifestyle.

When I met with staff, it seems like years ago, but some time ago, to talk about setting up this process, there were a couple of things that I talked about. One, we wanted to be transparent and open. Two, we wanted to ensure that every person who was interested had the opportunity to come and talk about what they thought we should do to help Americans address this issue.

That's why you're here. It affords you an opportunity to talk with us, to share with your colleagues about what you believe that we can do in terms of the revision of the food guidance system, the food guide pyramid, if you want to call it that, in terms of moving Americans in this country toward a healthier lifestyle.

Obesity is very important, and we need to address it. And we've taken some steps with our partners under the umbrella of the HealthierUS Initiative to start to do that. But the issue for us is, it's not just obesity. It's moving people toward a healthier lifestyle, which is not only what you eat, how much you eat, but also some level or some form of physical activity which we believe is also very critical in terms of addressing this issue for all of us in
this country.

I talk about these things because we love to talk about them. You all are going to come and speak, and we've had the opportunity to have -- how many forums have we had around the country? We had 12 forums around the country where we had people that actually came and talked with us about what they believed we could do to address this issue.

And interestingly enough, I posed three questions to people in the audience. I said, what do you believe government can do to address this issue? What do you believe you can do to address this issue? And what do you believe that we can do together to address this issue?

Interestingly enough, 90 percent of the comments were on what they believed government should do. They didn't believe they should do anything. They believed that they could continue to eat and not gain any weight, but that somehow we were going to fix all of their issues. I think you know that that's not the case.

This is an opportunity for us to hear from you about what you think that we can do and also you can do to address this issue in this country that is essentially killing us and severely compromising the health of our children.

This is very important. We take this very seriously. We are interested in continuing to move the ball
forward to take very proactive steps in addressing something that is very serious, that is compromising the health -- let me back up, severely compromising the health of many Americans.

A couple of points that I think are real important. Remember what I said, 30 percent of us are obese. At the current rate that we're eating, by 2010 it is anticipated that 40 percent of us will be obese. It took us almost 20 years to get from 20 to 30 percent. At the current rate that we're eating, we're going to get from 30 to 40 percent of us obese in less than six years. That should be of concern to all of us, and I know that it is. And because of that, we are so pleased and very happy that you are here.

One of the issues that is very important to be personally, and I know is very important to the staff, and it's also very important to the Secretary, is that regardless of the recommendations that we make in terms of what should be on the Pyramid, or whether there should be a Pyramid itself, or what the graphics should look like, is the fact that somehow we've got to be able to implement this and also to provide information to Americans so that they are able to make informed decisions and choices about the nutritional needs of themselves, their family, and their children.
And this is critical, because regardless of what we come up with, it's not going to make any difference at all if people don't use it. Because at the end of the day, at the end of the day, individuals still have to make some decisions about what they are going to do.

So we can provide them with information, but if they don't use it, if it's not user-friendly, if they don't think that it's relevant to them, then they are not going to use it.

We talk about obesity, and obesity is very important. But I'm also sensitive to the needs of the family, and the mother at home, who is trying to make, or is interested in making informed decisions about the well being and health of her children who may not be obese. I'm also sensitive to the needs of the person who is not overweight, who is not obese, and wants to maintain a healthy lifestyle so that they don't get there.

I'm also sensitive to the needs of the people who were obese, they've lost a lot of weight, and they're trying to keep it off so that they don't go back, or they don't do the yo-yo effect.

And I can speak to some of those things personally. Over the last couple of years, I lost 70 pounds. That's almost a person, not quite, but almost. 70 pounds. But over the course of the last year, I've gained
20 back. And so the issue for me, that I talk to myself about all the time, and they'll tell you that I ask this question, what information can you provide to me that will help me, one, lose that 20 that I've gained, keep it off, and try to maintain some sort of healthy lifestyle in my diet.

And so for me it's a personal issue, too. And so I ask of all of you today who are going to comment, and we're very pleased that you're all here, to think in terms of the big picture; to think in terms of your comments and how they would apply to all Americans and to people around the world, because I talked with my colleague most recently in the UK, that he's very interested in what we're going to come up with. And so not only are people in this country interested in this process, but also people around the world are watching.

We have the ability and the capacity to make a positive difference in the lives of a significant number of people. It is my hope, it is my desire, it is my belief that we can do that.

Again, thank you so very much for being here. We appreciate you taking the time out to come and comment. And we are looking forward to hearing from you today. Thank you.

DR. HENTGES: We now want to go ahead and review
for you where we're at in this process, what has transpired before, and go through a little bit quickly. If we could have the curtains opened. We'll go ahead and have the first slide, please.

Okay. This is where we are at. And this is the issue that we have before us, is where do we go with this emblem, with this product, to move forward in the future, and get the kinds of changes that Under Secretary Bost just talked about.

The USDA has a long history in this area. The actual food guidance history goes back to 1916. These are just a few of the depictions of that history. And some of them are familiar to you. The circle, in particular, the basic seven, is quite familiar. And you can see the iteration of the history. Next.

In 1992 then, that food guidance became the food guide pyramid that we currently know. Next.

The question is, with that guidance system, what are we eating? What is it that we are actually consuming today? Next.

This is our consumption pattern today.

Unfortunately, this is where we are at. This is the behavior that we get when we look at food patterns today. Next.

And that brings us to our dilemma of updating this
food guidance system, and where we are going to go. The scope has been two-fold. We have had a technical aspect and a consumer updating aspect.

With regard to the technical update of the data, we have new nutrition standards, include the dietary reference intake, and the 6th Edition that many of you have participated in of the Dietary Guidelines for Americans.

We also have new food consumption date, and new food composition data. And then, additionally, regarding this implementation, and getting the better behavior change, the consumer education update, we need to have a new systems approach, is what we're looking at; a new consumer research. What are we being told. And we're looking for that kind of input today. Next.

Last September, we had the first Federal Register notice calling for comments on the technical revisions to the food patterns. And many of you participated and we're very pleased with that. Next.

We had a large number of comments, and a wide range of views expressed. But there were topics where there was considerable agreement, and that included energy level and nutrition goals, and emphasis on whole grains, legumes, dark green vegetables, and unsaturated fat. And also the communications -- moving away from a standardized serving to more of a household measures type of communications.
While we have moved forward and summarized those comments, we are waiting to receive the final report from the Dietary Guidelines Advisory Committee to finalize that aspect of the revision. Next.

And that brings us to this, our second, Federal Register notice on revisions. On July 13th we put forth this notice. Next.

There are six specific questions that we ask for comment on. And we hope to hear a lot of comment today around those six questions. It includes whether to keep the shape and strategies that include motivational and educational elements. How do we individualize and personalize the messages in the system? What about a core framework of education messages, and key components that will allow us to develop effective interactive tools, so once you have the motivation and the education you can also improve behavior and increase physical activity?

And then delivery channels, what are the best delivery channels? What are the most advantageous, and what should be a priority in those delivery channels? Next.

Well, the question on most people's mind is, are we going to have a new shape? And indeed, there is no decision on that. This is part of the process in making that decision. And we are open to all ideas in that venue. Next.
Well, the process that we will be going through here is that we have the opportunity today for oral public comment. Written comments are due on the 27th of this month. And all the comments will be posted on the Center's website. And if you don't have that, you can ask any of our staff in here, and we'll make sure that everybody has that information.

Staff will then analyze and summarize these comments, and that input will be used in support of the development of the food guide system. Next.

Our time line for this activity is that public comments will be concluded this summer; the consumer research will be completed by late fall of this year. The new Dietary Guidelines, the policy document from HHS and USDA is expected to be delivered in early 2005; and then shortly thereafter, the new food guidance system will be unveiled. Next.

In this whole process, USDA is committed to having an open, transparent process, with lots of opportunity, as Under Secretary Bost said, for public comment. We are also focused on the implementation of this new system, and to be able to personalize this and to individualize this system to get a meaningful behavior change in the future. Next.

I can't emphasize enough this key element of implementation. If we do not get a better way of
implementing our guidance, then we will probably have the same sort of results that we have had. Our science has been strong and it continues to evolve. We have got to find the best way to implement this. Mr. Bost made this very clear as well.

And we are looking forward, then, to your participation, your partnership, which is going to be vital in success of this activity. Thank you.

Before we have the first speaker, I have a few housekeeping items to go over. Each speaker will have five minutes to make their presentation. If you will refer to the speaker list that was handed out, this is the order of speakers. So, as you see the speaker ahead of you take the podium, please move to this front left side so that we can orderly move through our presentations today.

Janie Fleming, on our staff, over here, who has the rose, will be our time keeper. Janie will hold up a yellow card indicating that you have one minute remaining to complete your remarks. At the five minute mark, Janie will display a red card that indicates that your time is up.

Before you make your presentation, please state your name and affiliation. For the benefit of the panelists and the audience and the transcriber, please speak directly into the mike, clearly, so we can make sure we record all the information.
All remarks are being recorded and transcribed, and they will be posted verbatim on the website, as soon as we can get them up.

This is a listening session, and it will not be a discussion or Q and A. And, it is governed by the rules of notice and comment. So we look forward to receiving your input. If we need a point of clarification, the panelists will ask.

Again, we appreciate everyone taking time to prepare these comments, and take time out of your busy schedule to participate in this activity. Thank you very much.

And the first speaker is Amy Lanou. I apologize ahead of time if I am not correct on all pronunciations. We will look for you to pronounce your name correctly. Thank you.

MS. LANOU: My name is Amy Joy Lanou. I'm with the Physicians Committee for Responsible Medicine. Thank you for the opportunity to offer input to this important process of developing a new food guide graphic and consumer education materials.

First, let me say that in keeping with the scientific literature on diet and disease risk, and changing chronic disease patterns, I feel that both updated dietary advice and a new graphic are an excellent idea. And I
appreciate the way you are going forward with trying to provide more targeted information to consumers.

Specifically, I feel that the graphic and the education materials should target problematic food consumption patterns, promote healthy eating, and reduce chronic disease risk, and provide strong, clear food-based messages on how to achieve healthy weight and long term good health.

To the first point, what is wrong with the American diet? We've seen a little bit about that this morning. We certainly consumer too much protein, saturated fat, transfat, sugar, salt and cholesterol. We consume far too little fiber, and lower than recommended amounts of a variety of vitamins and minerals.

Our average, case in point, our average adult fiber intake is about 10 to 12 grams per day. The new IOM recommendations double that amount.

We consume too many calories and far too many discretionary ones. Or, put another way, we consume too few foods from plant sources, too many highly proceeded convenience foods, and too many foods from animal sources.

Consider that cheese intake has doubled between 1975 and 1999. Consider also that in one national survey, only 15 percent of high school students met the five a day recommendation for fruits and vegetables, while over half
did not eat any cooked vegetables on the previous day. 

As we all know, the intake of fast food, sugar, soda, and other sugary foods has been on the rise. And fluid milk is the number one source of fat and saturated fat in children's diets.

To the second point, science on diet and disease risk clearly shows that diets built from plant foods, vegetarian and also vegan ones, reduce the risk of cancer, heart disease, hypertension and diabetes, among other medical conditions. Diets rich in fiber reduce the risk of heart disease, obesity, and some types of cancer, and are useful in the management of diabetes. Diets low in saturated fat reduce the risk of heart disease.

Diets low, very low in total fat, saturate fat, and cholesterol, are beneficial for the treatment of type two diabetes, heart disease, hypertension, and overweight. And many plant food sources contain phyto-chemicals that may protect against cancer and promote immune function, or improve immune function. Think broccoli, tomatoes, blueberries, sweet potatoes, garlic.

To the third point, I urge you to provide clear, strong messages and images that urge Americans to, one, increase our consumption of fruits and vegetables and other foods of plant origin. This is how we're going to meet those fiber recommendations.
Limit or avoid foods of animal origin. These foods are the primary source of heart disease, promoting saturated fat, and the only source of dietary cholesterol. They are fiber-less and calorie dense.

I would also urge you to make it clear the dairy products are optional, and highlight the full range of calcium containing foods in the US food supply. Many nondairy sources have the advantage of being low in saturated fat, and high in fiber.

I also recommend that we reduce our reliance on highly processed foods. Processing at its most creative changes a nutrient dense food into a pile of discretionary calories.

I also encourage you all to incorporate language to help consumers understand the importance of complex carbohydrate and fiber in the diet. Specifically, we need to help them distinguish carbohydrates from whole foods, such as whole grains, legumes, fruits and vegetables, from those in highly processed foods, such as soda, candy, sugary cereals, and many baked goods.

In short, the new food guide graphic, and consumer education materials, would better serve Americans if they encouraged choosing a diet built from plant foods, and the graphic should highlight legumes, whole grains, fruits and vegetables, and specifically identify the foods to be
limited or avoided, rather than disguising these recommendations using macro-nutrient descriptions that many laypersons find difficult to understand.

Taken in total, I would recommend that the new food guide graphic, and the core messages help individuals to use discretion when making dietary choices. Thank you.

DR. HENTGES: Our next speaker is Charles Baker.

MR. BAKER: Good morning. I am Charles Baker, vice president, Scientific Affairs at the Sugar Association. The association represents US sugar cane and sugar beet growers and processors, and was established in 1943 to monitor nutrition science, fund research, and educate the public.

Based on the totality of the scientific evidence, we support and promote sugar as a safe, useful, and important food ingredient. We appreciate this opportunity to provide testimony on the proposed revision to the food guide pyramid.

No matter the issue, the association firmly believes that the American public is better served when dietary guidance and nutrition policy are established solely on the entire body of science. Every major scientific review has concluded that lifestyle diseases, including obesity, are not linked to sugar's intake. This conclusion was once again the outcome of the exhaustive 2002 review of
macro-nutrient intakes conducted by the US Institute of Medicine.

The institute found no compelling evidence to establish an upper intake level for either total or added sugars. The institute stated unequivocally that there is no link between the increased intakes of added sugars in BMI, nor did it find evidence of nutrient displacement at commonly consumed levels.

That said, the association agrees that the public should eat a balanced diet, rich in fruits and vegetables and various grain products. The association further agrees that there are certain foods meant to be treats and consumed in moderation. However, the association continues to strongly disagree with the underlying premise attached to added sugars in the original food guide pyramid and its proposed revision.

First, proposed added sugar intake levels are based solely on mathematical formulas instead of credible scientific evidence to substantiate negative health impacts. This methodology contradicts the science-based approaches applied when intake recommendations for classes of dietary fats and micro-nutrients like calcium were established. The association requests that the same standard of persuasive evidence be applied to all nutrients, including added sugars.
Second, the proposed food guidance system continues to assign added sugars to the category of leftover calories to accommodate this mathematical model. The association questions the consumer benefit, since this creative model essentially minimizes the importance of fortified and enriched foods in the US diet. The association respectfully points out that this model artificially lowers the number of discretionary calories allotted to added sugars.

The proposed treatment of added sugars continues to give the consuming public the perception that sugar has no value other than the source of calories. For centuries sugar has provided functional properties to food systems like safety, due to its preservative action, and palatability, due to its capacity to balance the acidity and bitterness of fruits and vegetables.

Thus, sugar is present in many of the healthy foods necessary for maintaining balanced and nutritionally adequate diets. Healthy foods require ingredients, and sugar is a natural time tested ingredient, with only 15 calories per teaspoon.

Continued mathematically-based emphasis on added sugars in food guidance in the absence of any valid scientifically verifiable detrimental health implications will only further obscure the real issue. If one consumes
more calories, no matter their sources than one requires for daily activities, weight gain is inevitable.

All of us in this room know obesity rates only increased throughout the low and fat decade of the 1990's. Focusing on the restriction of one food ingredient category, added sugars in this instance, camouflages the significance of caloric balance. The unintended consequence that it is okay to eat as much as one wants will only be repeated if a low in added sugars decade replaces the failed low in fat decade.

The pyramid's mathematical model lacks a scientific underpinning to be used as the basis for official or unofficial quantitative recommendations for levels of added sugars intake. Therefore, the association respectfully asks the Center for Nutrition Policy and Promotion to seriously consider this fundamental shortcoming as it directs revision of the food guide pyramid. Thank you.

DR. HENTGES: Thank you very much. Our third speaker is Mary Young.

MS. YOUNG: Good morning. I'm Mary Young, a registered dietician and executive director of nutrition for the National Cattleman's Beef Association, funded by America's beef farmers and ranchers. Thank you for the opportunity to offer some thoughts about improving our
nation's food guidance system. We commend USDA for focusing on nutrient density and energy balance in its considerations for the food guidance system. We believe these are the two most powerful concepts to address in today's environment. Given the epidemic of overweight and obesity, we must help Americans watch their calories, and help them make their calories count more.

And improved food guidance also needs to be communicated in a way that achieves sustainable behavior change. The food guidance system must fulfill its mission to help people follow the dietary guidelines for Americans. The dietary guidelines scientific advisory committee recently concluded that a person needs to eat from all five food groups to meet all their nutrient needs. Thus food guidance needs to help people build healthy diets. Each food group offers different essential nutrients that are critical to promoting health and preventing chronic disease.

Meat plays an important role in health, and is a fundamental building block in food guidance. In fact, in your published food patterns, USDA showed the important nutrient contributions of meat within a calorically balanced diet.

Improved food guidance needs to communicate this
important point. For example, just one three-ounce serving of lean beef is an excellent source of five essential nutrients, protein, zinc, vitamin B-12, selenium and phosphorus, and a good source of four, niacin, B-6, iron and riboflavin. And today, people can easily manage their saturated fat intake by choosing one of 19 cuts of beef that meet government standards for lean.

Variety within food groups is also important. Within the meat group, for example, different proteins bring different nutrients to the table. Given the current concern over caloric intake relative to obesity, it is important to note that when comparing protein equivalents, beef provides significantly fewer calories than do some vegetable proteins. In fact, a one-ounce serving of ground beef contains the same amount of protein as a half-cup serving of legumes, yet only half the calories.

A healthy lifestyle is more than just eating. It is also about being active everyday. The food guidance system needs to emphasize the importance of energy balance by showing people how to enjoy daily physical activity, balanced with the amount of food they eat.

The food guide graphic should be evolutionary, not revolutionary. The USDA should build on the food guide pyramid's powerful brand recognition by keeping the pyramid shape, but strengthening it to make it more actionable. For
example, the graphic could be a two-dimensional pyramid that promotes energy balance and nutrient density by illustrating physical activity on one side, and naturally nutrient rich food choices on the other.

The food chart should show all five of the nutrient-bearing food groups and their recommended daily servings for a 2000 calorie diet, to make it compatible with the nutrition facts label. This simplified pyramid graphic could then support core messages for the general population to emphasize nutrient density and energy balance.

For example, a core nutrient density message that has tested well, with both professionals and consumers is, choose naturally nutrient rich foods first, such as whole grains, fruits, vegetables, lean protein sources, and low and nonfat dairy.

You've asked whether the food guidance system be generalized or individualized. We believe this is not an either/or proposition. In fact, in the interest of improving public health, it must be both.

The food guide graphic must provide a teachable moment for those consumers who may not seek or have access to individualized guidance. It is imperative that the improved graphic be available, accessible, and meaningful in and of itself, to reach people who may not have access, such as low income and low literacy populations.
The food guide graphic must also be accompanied by an education system that is flexible enough to allow people to individualize, based on age, lifestyle, and culture. This system should be designed to motivate behavior change. To do this, the system must be rigorously tested among consumers to ensure that the graphic and messages are clear and realistic, and that people are able to use it successfully.

Food guidance should involve all sectors of society to reach the widest possible audience. We encourage USDA to strengthen its existing public/private partnerships, such as the Dietary Guidelines Alliance, a longstanding successful partnership between health organizations, the food industry, HHS and USDA. Public/private partnerships are vital in extending the reach and impact of the new food guidance system. Thank you for your consideration.

DR. HENTGES: Thank you. Our fourth speaker is Barbara Berry.

MS. BERRY: Good morning. My name is Barbara Berry. I'm vice president of programs for the Produce for Better Health Foundation. PBH is the founding partner, along with the National Cancer Institute for the National Five-a-Day for Better Health program that encourages all Americans to eat five to nine servings of fruits and vegetables.
We are pleased to have USDA as such an integral part of our partnership, and appreciate your increased involvement over the past several years to promote fruits and vegetables, throughout many USDA programs and agencies. Thank you for providing me this opportunity to highlight PBH's recommendations on the reassessment of the food guide pyramid. I'm here today to provide three overall recommendations.

First, PBH recommends that the new food guidance system, no matter what shape it takes, needs to place a stronger emphasis on the role of fruits and vegetables. Specifically, based on the meeting of the dietary guidelines advisory committee, just last week, we recommend that the words five to 13 servings accompany the new food guidance graphic, and that fruits and vegetables figure more prominently in both the graphic and core messages.

We make this recommendation for the following five reasons. One, current intake for fruits and vegetables is low. Of all the key dietary recommendations, consumers do the worst in meeting the fruit and vegetable guidelines. So therefore, they need to be more prominently emphasized.

CMPP's own data shows, for example, the consumption of orange and green leafy fruits and vegetables is far below recommended intake levels. Women and men need to increase their dark green vegetables, for example, by 330
percent, and 406 percent respectfully, to meet the increased pyramid, the existing pyramid recommendations.

Second, all age and sex groups show a lack of variety in their fruit and vegetable intake. So not only are consumers under-consuming fruits and vegetables, but they're not eating enough variety. Just six fruits and vegetables make up about 50 percent of all the fruits and vegetables consumed by Americans.

Third, fruits and vegetables play a critical role in disease prevention and health promotion. And the science supporting this continues to grow stronger every day.

Fourth, fruits and vegetables can assist with weight management. When paired with activity and used as a substitute for energy dense less nutritious foods, fruits and vegetables play an important role in weight maintenance and reduction. Upbeat messages about eating more fruits and vegetables are a welcome relief from more restrictive approaches.

And fifth, fruits and vegetables play a critical role in meeting the new IOM recommendations for fiber and potassium. These new levels cannot be met without increasing fruit and vegetable intake levels.

For these five reasons, PBH urges USDA to assure that any food guidance system needs to better reflect the higher number of servings, the five to 13, and place fruits...
and vegetables more prominently in the graphic.

Our second recommendation deals with how to effectively communicate important dietary messages to consumers without overburdening them. USDA has recognized the need to provide consumers with a more individualized approach, based on their unique needs and intake patterns. We generally support such a strategy.

We have concern, however, regarding an approach that depends in large part on consumers needing to take extra steps to gather additional nutrition information, whether it's via the internet or CD rom.

We're concerned about the large number of Americans who don't likely share our keen interest in diet and health, and who may not take these extra steps. Before significant resources are spent on websites, interactive tools and brochures that may not reach those most in need, we urge USDA to take a hard look at existing social marketing efforts, and invest in strategies that have a proven track record.

Our final recommendation addresses the need for enhanced coordination among key government agencies. USDA's efforts to communicate key health messages to consumers should be coordinate with agencies such as the FDA that have specific expertise in this area. PBH suggests that CNPP work with FDA to develop a new set of standards to define
the use of any symbol or icon that may be used on food packages. The use of a symbol should be limited to food products that we want consumers to eat more of.

Because the pyramid currently appears on a wide number of food products, regardless of their nutritional quality, it's not an effective tool today in helping consumers make wise food choices. If USDA intends for the new symbol to have a significant meaning to consumers, then standards need to be developed, and they must be monitored and enforced.

In summary, in order to move consumers beyond simply recognizing the pyramid, the graphic and key messages must focus on those areas in most need of change. This includes encouraging consumers to eat more fruits and vegetables. This more targeted and cost-effective approach to behavior change puts the new food guidance system concepts into actionable steps.

We look forward to working with USDA and others as you continue your efforts to help consumers make healthy food and beverage choices. Thank you.

DR. HENTGES: Thank you. We are planning to have a break at 10:30, so if you are wondering if we are going to stop at all, indeed we will have a break at 10:30. Our fifth speaker is Stuart Trager.

DR. TRAGER: Good morning. Let me begin by
thanking you for the opportunity to present to you today, this morning, the Atkins Food Guide Pyramid, and our thoughts regarding the subject.

I am Dr. Stuart Trager, medical director of Atkins Nutritionals. And I am here today representing the tens of millions of people who have been helped by the Atkins nutritional approach, and who can be helped by controlling carbohydrates in the future. Together, we can offer options, offer solutions, and we can make a difference in helping people take a more active role in improving their health and managing their weight by recognizing emerging science, and the values of controlled carbohydrate nutrition.

With other 64 percent of our population overweight or obese, and more than 400,000 Americans dying of obesity-related diseases each year, the magnitude of this problem is not lost on any of us. It's becoming increasingly important, in fact, that we provide scientifically validated solutions to help people take an active role in managing their health and their weight, and find approaches that people can follow, as you pointed out earlier.

Moving beyond a one-size fits all approach that has failed to impact the epidemic, is critical. As is the recognition that solutions must work not only in the laboratory, but that they must work for real people in the
real world with real appetites and real lifetime stresses that preclude some of the other approaches that are sometimes discussed. Despite relentless admonishment regarding the evils of fat consumption through the national dietary guidelines, we have seen only limited success in lower the percentage of total fat intake with overall fat consumption actually rising. People simply can't follow this approach despite the fact that we've made this message very clear, repeating the message louder and louder, unfortunately, like dealing with our children sometimes, doesn't necessarily get the point home. We need to find a message that they can hear and are willing to embrace and accept if we expect to see results that are truly meaningful.

Even more staggering than the rise in fat consumption has been the overall consumption of highly refined carbohydrates and products with added caloric sweetners. Making foods that are low in fat to taste good and be acceptable requires, unfortunately at times, the addition of highly refined carbohydrates and sweetners to appeal to taste.

In the last three years alone, it's important to recognize that over 30 different studies published in prestigious peer review journals from major universities, and in many cases, funded by independent groups like the
American Heart Association and the National Institute of Health, have validated the Atkins nutritional approach to controlling carbohydrates as a valid solution that can help many improve their health and manage their weight effectively.

This research can no longer be ignored. Difficult as change may be, a nutritional policy must reflect science. Must as the low fat advocates and the animal rights activists would like, the accumulating body of scientific evidence can no longer be ignored.

For many, controlling carbohydrates has provided a valuable solution for taking an active role in managing their weight and improving risk factors for heart disease. It has helped them regain energy and in doing so changed their lives.

This, too, cannot be ignored. With the message of calorie control and fat restriction having failed many, it's time to offer a solution that works. Experts agree that a solution is not to be found in a particular diet, but rather a modification of lifestyle risk factors for obesity. This would include dietary modifications, combined with exercise to reach long term net health gains. And as we must remember, the solution must be one that people can embrace.

It is disheartening as we fight to manage the rising costs of health care, that less than 20 percent of
the population is currently following the guidelines and recommendations to eat less and exercise more. Especially when we consider the tremendous popular support that has grown for controlling carbohydrates.

Recognizing that people like to eat this way, can eat this way, and get tremendous results when they eat this way, and that this is backed up by scientific studies, is worth considering at a time when we take on such a great challenge like revising our guidelines.

Revisions to the pyramid must represent the dynamic relationship between activity and food intake, and there can be no escaping the understanding that exercise is clearly important for long term helpfulness. For this reason, our pyramid clearly demonstrates the relationship between increasing activity level and increasing food choices, as well as stresses the importance of consuming good carbohydrates, fruits and vegetables.

I think it's interesting to note on the pyramid, as you bring up (indiscernible).

Counting carbohydrates is quite simply easier for many people than eating smaller amounts of less satiating foods. And with new scientific research showing that there is, in fact, a metabolic advantage to controlled carbohydrate nutrition, we must figure this into recommendations going forward as it can provide a useful
tool for people who have struggled with managing their
weight because of genetic predisposition and activity levels
that haven't been able to be raised to the level that would
allow them, based again on their genetics, to manage their
weight effectively.

As the science in support of controlled
carbohydrate diets continues to mount, and national
guidelines are revisited, much can be gained by decisions
made to enhance, rather than stand in the way, of this very
encouraging development in fighting obesity.

To this end, we would hope that revisions to the
guidelines include recommendations that recognize the
benefits of adequate protein consumption, the importance of
balanced untreated fat consumption, and finally, teaching
carbohydrate awareness, so that Americans can learn to
respect and understand how this group of macro-nutrients
further impacts not only their weight, but also their
health.

We're offering our version of the pyramid as an
easy to follow, scientifically validated solution, that is
built on the principals of carbohydrate awareness. Our
pyramid refocuses attention towards nutrient dense whole
foods, noticing again that fruits and vegetables play a
major role right in the center of our pyramid. Pyramid
looks at whole foods and those carbohydrates with the least
impact on blood sugar as part of a healthy diet.
Helping our population better understand the
relationship between what we eat and how it affects our
health and weight, has never been more important. To this
end, we believe that giving people options that work, and
those that they can follow, must be a priority. The
solution must be individualized. It must be embraceable.
And it must include lifestyle changes.
We have seen the impact of controlled carbohydrate
nutrition now in tens of millions of people. We have seen
its acceptance, and people actually choosing it because it
is a lifestyle they can embrace. We are optimistic that
greater carbohydrate awareness --
DR. HENTGES: Please. Excuse me, please.
DR. TRAGER: -- play a significant role in --
DR. HENTGES: Please wrap up.
DR. TRAGER: Thank you.
DR. HENTGES: Thank you very much. Our sixth
speaker is Bill Sanda.
MR. SANDA: My name is Bill Sanda. I am the
director of public affairs for the Westin A. Price
Foundation. The foundation is a nonprofit 501(c)(3) food
and nutrition educational organization founded in 1999,
dedicated to restoring nutrient-dense foods to our diet
through education, activism, and research.
I want to take this opportunity to thank the USDA and the Center for Nutritional Policy and Promotion for conducting this very important public hearing on the food pyramid.

Before I give our recommendations, I wanted to make two comments. A 1971 USDA study on nutrition titled, an evaluation of research of the United States on human nutrition reported, number one, major health issues are diet related.

Number two, the solution to illness can be found in nutrition.

Number three, the real potential for an improved diet is preventative in that it may defer or modify the development of a disease state.

And fourth, better health, longer life span, and greater satisfaction from the work, family, and leisure time are some of the benefits from improved nutrition. Interestingly, this study was never released by the Nixon administration to the public.

In addition, many now believe that we have more altered our food, we have more altered our food supply in the last 50 years, than we have in the last 10,000 years, when humans started to shift their, from hunter gatherers to farming practices.

Given these findings, as well as many others, on
nutrition, food in our diets, obviously play a most
significant role in our health and well being. To that end,
the foundation finds an effective approach to healthy
nutrition is to go back to the four basic food groups and
eating practices recommended more than 60 to 70 years ago in
books on nutrition dietetics written before the introduction
of imitation foods in the 1950's.

The Westin A. Price Foundation makes the following
recommendations. First and foremost, abandon the current
food pyramid concept. Return the proposed food guidance
dietary guidelines to plain high quality of foods in the
four basic food groups.

Every day, eat high quality unprocessed foods from
each of the following groups. Animal foods, meat, poultry,
fish, eggs and whole milk products; grains and legumes,
including whole grain baked goods, breakfast cereals and
beans; fruits and vegetables, preferably fresh or frozen;
fats and oils, unprocessed, saturated and mono-unsaturated
fats including butter and other animal fats, palm oil,
coconut oil, olive oil, and peanut oil. Eat sparingly,
sweets, white flour products, soft drinks, and fried foods.

Urge the avoidance of processed foods containing
refined and partially hydrogenated vegetable oils, highly
sugared foods, especially those foods containing high
fructose corn syrup, as well as foods containing refined
highly processed protein isolates. In addition, we would limit the added sugars to no more than 10 percent of our daily caloric intake.

As you can see, we don't distinguish between any particular food group as to which should go before the other, as the food pyramid does now.

I am aware of the fact that this statement contradicts the information given to both the health profession and the public since the development of the dietary guidelines in the 1970's.

Our experience is that the current food pyramid does not give anyone trying to use any clear indication of the amounts of natural food products that would be appropriate, versus the processed food products that would be selected.

Our preference is that all food products used for forming meals and snacks should be natural and not highly processed products that are so readily available in a supermarket. That would mean that there should be a minimal amount of products being promoted that are made or prepared with trans-fatty acid containing partially hydrogenated vegetable oils, or with excessive amounts of the refined polyunsaturated oils with high amounts of omega-6 essential fatty acids, which are highly inflammatory.

Natural more saturated fat and oils, such as
butter, tallo, lard, coconut, palm, and palm kernal oils should be encouraged rather than discouraged, because of their health promoting benefits. These include the saturated fatty acids such as palmetic acid and loric acid, both of which are needed in the diet. Palmetic acid keeps the lungs healthy, and loric acid helps the body fight many pathogenic bacteria and viruses.

Butter should be used instead of margarine. Milk and cheese products should be preferably full fat. Nut and bean milks should used judiciously, knowing that they are not an appropriate replacement for cow or goat milk. And imitation cheese should be avoided. Eggs should be farm raised, as opposed to factory or battery raised.

Only during the last century, as man's diet included a high percentage of refined carbohydrates. Our ancestors ate fruits and grains in their whole, unrefined state. The nature of sugars and carbohydrates, the energy providers, are linked together with vitamins, minerals, enzymes, protein, fat and fiber, the body building and digestion regulating components of the diet.

In whole form, carbohydrates support life, but refined carbohydrates are identical to light because they are devoid of body building elements.

The amounts of grain products should be individualized with the realization that many individuals
are carbohydrate sensitive. Grain products made with sugar or high fructose corn syrup should be recognized as foods for occasional consumption that may have excessive calories for some individuals. Fruits and vegetables should be encouraged to be grown organically. I thank you very much.

DR. HENTGES: Thank you. Our seventh speaker will be Dean Ornish.

DR. ORNISH: Thank you for indulging me. I appreciate it. Distinguished panelists, ladies and gentlemen, thank you for the opportunity to be here today. It's just on a personal note, the last time I was in this hall was four years ago when we had the great nutrition debate with Dr. Atkins and others. So it's nice to be back. And while we're on the subject, it's worth mentioning to try to clarify some of the common misconceptions that we've heard from previous speakers and in the general media that people say, you know, Americans have been told to eat less fat. They're fatter than ever, therefore, fat is not part of the problem; when in fact, Americans are actually eating more fat than ever. They are eating even more simple carbs. So the relative percentage of fat in the American diet has gone down, but the total amount of fat is actually higher than ever. And so therefore, the pyramid that I represent is suggesting eating less fat and fewer simple carbs. And
second, that the studies of the Atkins diet have focused primarily on weight and triglycerides and lipids. Those studies that have actually looked at blood flow to the heart, have found that it gets worse. And that's one of the bottom lines.

So before accepting recommendations to increase the amount of red meat and animal protein in the American diet, I think it's important to take an evidence-based approach that looks at the actual disease processes, not simply at risk factors.

In our work, we've spent the last, I guess, 27 years doing a series of randomized trials, showing that when people eat a diet comparable to what's on this food pyramid, heart disease can be reversed. Our new studies indicate that the progression of prostate cancer can be stopped and even reversed in some patients. And so having seen what a powerful difference these changes can make, I hope that the pyramid guidelines reflect these, so that they can be made available to more people.

I like the concept of the pyramid, because it's really about a food spectrum. It's saying, you have a range of choices, and as opposed to a diet that you get off or that you get on.

And as soon as you tell somebody, don't eat this, don't eat that; do eat this, do eat that, people immediately
want to do the opposite because part of what we've learned is that even more than being healthy, people want to feel free and in control. And the food pyramid gives you a spectrum, and the message can be, to the degree that you move in a healthful direction, you can lose weight, feel better, and look better and be healthier.

I also think it's worth pointing out that there is a lot that we all agree on. I wrote an essay in Time Magazine a couple of months ago to say that there is actually a lot of agreement. For example, I think most people agree that trans-fatty acids should be avoided; that simple carbs should be reduced. Even Dr. Atkins and I agreed on that.

It's where you go from there. I don't think that, again, red meat and so on are the ways to go; but rather to increase your consumption of fruits and vegetables, whole grains, legumes and soy products. I think that we all agree that omega-3 fatty acids are beneficial in reducing the risk of sudden cardiac death, and stabilizing endothelium, and in reducing the risks of prostate, breast, and colon cancer.

And again, it's not just what you exclude from your diet that's harmful, but what you include that's beneficial. And there are at least 1,000 substances that are protected that have anti-cancer, anti-heart disease, anti-aging properties. Phyto-chemicals, bio-flavinoids,
carotinoids, retinals, isoflavones, dremosine, lycopine.

There is alphabet soup of these.

Where do you find these? With few exceptions, you find them in fruits, vegetables, whole grains, and legumes. That's why they're at the base of the pyramid, where I think that they belong.

The major difference that I have with, for example, Dr. Walter Willet, and others, whose work I respect tremendously, is the emphasis on plant-based oils. And I think plant-based oils can be beneficial, particularly the omega-3's, but Americans have 10 times as many omega-6 as omega-e's. And so an emphasis on olive oil, for example, is only going to exacerbate that.

And second, we've heard a lot about energy balance, which is true. And all oils have nine calories per gram. So if you have one tablespoon of oil, you're going to have 14 grams of fat, multiply that by nine for the number of calories, it's a tremendously energy-dense way of getting calories.

And so from the standpoint of reducing caloric intake, I think that oil should be closer to the top, rather than near the bottom. But I do think that it's important to distinguish between the simple carbs and the complex carbs, and I think that would be the major difference between the old food pyramid and what we're proposing here.
So in summary, this is an evidence-based approach that also recommends moderate exercise, stress management techniques, and social support with an emphasis on fruits, vegetables, whole grains, legumes and soy products, with some plant-based oils, some egg whites, some fish for those who want it, trying to avoid the mercury and the toxins, and minimizing the intake of simple carbohydrates and red meat.

Thank you. And there are copies of this on the table outside.

DR. HENTGES: Thank you. Okay. Our next speaker is Susan Laramee.

MS. LARAMEE: Good morning. I am Susan Laramee, a registered dietician and president of the American Dietetic Association. On behalf of the more than 67,000 members, I would like to thank you for taking on this thorough, transparent and evidence-based review of the food guidance system. ADA is a strong advocate for evidence-based nutrition guidance, and is proud to be a participant in this process.

Given ADA's reliance on science, we support maintaining the pyramid shape as the primary icon for the food guidance system. The original research that identified the pyramid as the best guide to communicate variety, proportionality, and moderation is still valid today.

Although it is clear that the food guide pyramid has
not been fully affective as an independent nutrition education tool, it is not the shape, but rather the content details and the accompanying consumer messages that need to be revised.

ADA regularly conducted nutrition trend surveys that give us insight into consumer behavior, knowledge, and perception. In 1997, in a survey, we asked people if they recognized the food guide pyramid, and if they found it valuable. Two-thirds of the people recognized the pyramid and almost half of them considered it valuable.

In 2002 we asked people to identify correct serving sizes for different foods. With the exception of bread, the majority of consumers could not correctly identify the serving sizes of foods. With very few exceptions, the consumers perceptions of the right serving sizes are larger than those recommended by the food guide pyramid.

While people recognize the pyramid, and many people value the pyramid, most do not understand the message of the pyramid. They are particularly puzzled about issues related to moderation, such as the serving size confusion illustrates.

ADA suggests that the graphic be maintained, that the content be updated, and the focus be on improving consumer understanding. Serving sizes must be harmonized
amongst all government programs, such as food labels and the pyramid.

The utility of the updated food guidance system will be directly related to the effectiveness of the consumer messaging that accompanies it. The range of strategies described in section three of the Federal Register will require considerable market testing, with diverse audiences in order to ensure that the graphic, design, and core messages communicate what is intended to all those audiences to whom it is intended.

The messaging will be most effective if coordinated with other relevant agencies. Most importantly, USDA should coordinate with FDA on the issues of serving sizes, such as the nutrition label complements, so that the nutrition label complements, rather than confounds, the message of the food guidance system.

Given the importance of the consumer research in making these messages relevant and effective, ADA suggests that the consumer research results be made public and available via the Federal Register. The consumer messaging piece requires the same level of analysis as the technical background piece received. Continuing with the transparent and evidence-based approach to the food guidance system development beyond this comment period and throughout the development of the messaging is paramount to creating the
best outcomes, and to maintaining the process' credibility. ADA supports the food guidance system's focus on the total diet, and the general principals of good nutrition: variety, proportionality, and moderation. Those messages are based in sound science. It is critical that consumers be more than just familiar with a message. They must understand it in order to be able to apply it in their daily life.

ADA stands ready to assist USDA in developing a scientifically-based consumer-oriented food guidance system, and looks forward to continuing to work with USDA to communicate the messages of healthy eating to Americans. Thank you.

DR. HENTGES: Thank you. Our next speaker is Allison Kretser.

MS. KRETSE: Good morning. I'm Allison Kretser, representing the Grocery Manufacturers of America. GMA appreciates this opportunity to comment on the graphics and educational materials for the food guidance system that have been proposed for the Center for Nutrition Policy and Promotion at USDA.

As the voice of branded foods and beverages, the foods that people purchase at the supermarket everyday, GMA will provide more detailed written comments by the August 27th deadline. Today, I will make four points that GMA and
its member companies believe are key to a successful food guidance system.

One, keep the shape of the pyramid. It's not the shape that's hampered Americans from following the current pyramid's dietary advice. The pyramid is widely recognized. A number of GMA companies use it on their packages and the department should build on the brand equity it has built since 1992. By all means, change the dietary recommendations inside the pyramid based on the most recent nutrition and health science.

Two, prioritize the changes in the food supply and dietary habits. Neither consumers nor the food and beverage industry can make all of the recommended changes overnight, so help us all avoid failing. Surely the Center for Nutrition Policy and Promotion knows what changes it would like to see first. Let us all know so that we can succeed.

Three, make the goals achievable for all Americans. The proposed food guidance pyramid appears to recommend ideal diets for Americans. This will likely be a significant challenge for most consumers, and therefore a challenge to the success of the food guidance pyramid.

For the pyramid to be a useful tool for most Americans, it's imperative that the agency lay out a roadmap. The shortest path to the top of a mountain may be straight up, but almost all hikers actually use an elaborate
set of switchbacks to get to the summit successfully. The
same holds for changing dietary habits.

Individuals should be encouraged to make small
improvements in eating that over time add up and move them
closer to meeting the recommendations of the new food
guidance pyramid, incremental but cumulative change should
be encouraged and applauded.

Four, harmonize educational information across all
consumer touch points, including dietary guidelines, the
food guidance pyramid, and the nutrition facts panel. GMA
urges the department not to conflict with the NLEA
regulations that comply with a statue of law on what
constitutes a serving size. While it is true that the
serving sizes for the nutrition facts panel and the revised
food guidance pyramid serve different purposes, care must be
taken that conflicting advice on what constitutes a serving
should not be given to the consumer.

In closing, we all have a shared goal, getting
consumers to reach and maintain a healthy lifestyle. GMA
and its member companies stand willing to be an effective
partner with the department by amplifying the diet and
nutrition messages developed by the department and
motivating consumers to make healthy food choices. Thank
you.

DR. HENTGES: Thank you. Our next speaker, and I
MR. DALAL: Good morning. Thank you for the opportunity to hear the comments. My name is Saurabh Dalal and I'm speaking on behalf of three organizations: the International Vegetarian Union, of which I'm secretary, and its regional arm for North America, the Vegetarian Union of North America, as well as the Vegetarian Society of D.C. So there's little doubt about what the theme of my comments will be.

Vegetarian foods offer powerful advantages and are best for humans. So many studies have shown and proven the remarkable health benefits of a vegetarian diet. Animal products are the main source of saturated fats, and the only source of cholesterol in the diet. Animal products contain no fiber, and we know fiber helps reduce cholesterol levels.

I claim that a well planned low fat vegetarian diet, actually a vegan diet, where no animal products whatsoever are consumed, is the best diet for humans. Preventing and actually reversing heart disease, as we have heard, preventing certain cancers, preventing and reversing diabetes, lowering blood pressure, helping manage weight, are some of the successes of such a diet, and the list goes on.

The American Dietetic Association in its 2003 position paper on vegetarian diets states, well planned
vegan and other types of vegetarian diets are appropriate for all stages of the life cycle.

Vegetarian diets offer a number of nutritional benefits including lower levels of saturated fat, cholesterol, and animal protein, as well as higher levels of carbohydrates, fiber, magnesium, potassium, folate, and antioxidants, such as vitamin C and vitamin E, as well as phyto-chemicals.

Vegetarians have been reported to have lower body mass indices than nonvegetarians, as well as lower rates of death from ischemic heart diseases. Vegetarians also show lower blood cholesterol levels, low blood pressure, lower rates of hypertension, type two diabetes, and so forth.

The unified dietary guidelines developed by the American Cancer Society and the American Heart Association, the National Institutes of Health, and the American Academy of Pediatrics -- and note no word of vegetarianism in any of those organization names -- they all call for a diet based on a variety of plant-based foods, including grain products, vegetables, fruits, to reduce the risk of major chronic diseases.

And your group, of course, the USDA in its fifth edition of the dietary guidelines for Americans in 2000, states, vegetarian diets can be consistent with the dietary guidelines for Americans and meet recommended daily
allowances for nutrients. They give recommendations on meeting nutrient requirements for those who choose to avoid all or most animal products. So support for vegetarian diets is established and strong.

If the food guide pyramid is to continue to emphasize specific nutrients as in the cases of calcium and protein, represented by the milk, et cetera, group, and the meat, et cetera group, then the updated pyramid and graphic could demonstrate the above important positions by illustrating plant foods and alternatives more prominently. The group should be renamed something akin to calcium, et cetera, group, or the protein group, and not only can plant products provide calcium and protein along with all the nutrients needed, they also are typically lower in saturated fats and cholesterol. Plant foods are then indeed better sources.

The key is removing the emphasis on animal derived foods in favor of plant foods, with the well-represented vegan diet being optimal.

A few reminders on nutrition and health, a diet drawn from varied plant sources easily satisfies protein requirements without the potential for protein excess. I'd go on, but there are many parts there.

Many plant-based sources of calcium exist. And examples are soy and rice milks that are fortified,
fortified juices, all sorts of dark, leafy greens, and many others. Let's not forget the calcium absorption and bioavailability from these foods have been shown to be excellent.

Each serving of these plant-based sources of calcium also count towards choices from one of the other food groups, like say cooked leafy green vegetables count as a serving results from the calcium-rich groups, and in the vegetable group.

More extensive range of dietary sources of calcium would increase intakes of boron, vitamin K and magnesium, helping reduce the risk of osteoporosis. Animal products force calcium out of the body, and so promote bone loss. Again, well-planned vegetarian diets and yield a lower risk of osteoporosis. Iron is, of course, plentiful in beans, whole grains, and fruits. Flax seeds are an excellent source of omega-3's, while fish has the downside of potential mercury content, other contaminants, and significant cholesterol.

A few broad observations. Eating patterns are changing, and the diets of a great many towards a more plant-based diet are true for in the past decade, including vegetarians with a proportionally high percentage of vegans and many quasi-vegetarians. There is tremendous interest around vegetarians when the USDA guidelines must address
those needs.

The eating patterns of many people who do not use milk and dairy products for ethnic, health or ethical reasons, need to be reinforced by guidance that is more comprehensive in terms of alternatives to animal foods. There is a greater societal context, and what's better for the individual in terms of vegetarian foods, is also what's best for the health of the country and the planet, if I had more time. But the numbers are truly staggering.

A simple, wholesome, well-planned vegetarian diet that consists of no animal products, is the right type of guidance to establishing healthy eating habits through the daily selection of foods. Let's make sure we're doing our utmost to make the lives of our citizens far better, and also recognizing and improving on the way we impact the world and indeed in turn ourselves.

So we urge the reassessment team to incorporate even more vegetarian foods, specifically, a well-planned low fat vegan diet, and the remarkable benefits in all respects as you update the food guide pyramid and the dietary guidelines. Thank you for your time and consideration.

DR. HENTGES: Thank you. After the next speaker, we will go ahead and take a 10 minute break. Our next speaker is Sue Borra.

MS. BORRA: Good morning. I'm Susan Borra with
the International Food Information Council, and I want to thank you for the opportunity to comment on the revision of the food guidance system.

The decision to revise food guidance is extremely timely, given our current understanding of the way consumers attitudes and behaviors are about diet and nutrition. Surveys tell us that consumers are feeling confused. They're feeling conflicting. And they feel this advice is constantly changing.

Therefore, it's important as we look at future food guidance, that it provide clarity in its messaging to meet consumer needs, as also motivate positive behavior change.

It's through the IFIC foundation's experience in conducting consumer research and developing consumer messaging, we'd like to share the following insights. The first vital step to developing new food guidance is consumer research. The food guide pyramid has indeed been very successful in getting recognition over the years. In fact, recent consumer research shows that almost 90 percent of the American public recognizes the current pyramid graphic. This is an enormous accomplishment, and it provides an excellent framework to build upon as we modernize and build our nutrition guidance.

At the same time, though, we also know that a
majority of our Americans do not follow the pyramid's advice. The divide between recognition and behavior certainly provides an opportunity for us to improve our food guidance messages. The best way to ensure that the public will be receptive to nutrition and physical activity messages is to conduct consumer research.

Consumer research will help us to be instrumental in personalizing the food guidance information, improving on educational messages, and also it should be used to guide creation of interactive tools to increase motivation to follow the guidance.

Now, developing messages that personalize food guidance is our next important step. We know that each individual has unique food preferences, and consumer research has told us, we really need to respect these preferences when it comes to recommending food intake.

Therefore, it's necessary to provide individuals with highly personalized nutrition information that really fits into their lives. Additional consumer research that we've conducted in collaboration with USDA and the Food Marketing Institute indicates that pyramid messages are much more useful to consumers when they are tailored to meet their specific needs.

For example, participants in our research found it was more understandable when things like portion sizes for
various food groups were illustrated in the context of the foods that they eat, such as a deli bagel is equivalent to four or more servings from the bread group. Consumers told us that they found providing portions size information in real life amounts was very helpful and something that they could relate to.

Maximizing public adoption of new food guidance may appear to be daunting, therefore, our next recommendation is to use partnerships to reach the widest possible audience with the clearest possible messages. This can be done by forming partnerships with groups such as health professional organizations, educators, food industry, and even the media.

One such entity is certainly the Dietary Guidelines Alliance. This alliance is a public/private partnership that's been active in extending dietary guidelines for Americans since 1995. The group's consumer research can provide a strong foundation for developing and designing effective food guidance communications.

So in summary, three steps should be taken as you start down this pathway to increase food guidance effectiveness. Conduct consumer research, personalize the dietary advice, and utilize partnerships. It's important that while you're thinking of food guidance revision, that this revision be guided by consumers, rather than merely be
developed for consumers. This is accomplished by conducting consumer research throughout the development process, and using this information to personalize the dietary advice. Consumers will be much more likely to adopt messages that they can identify with, thus increasing public health and wellness. And to disseminate these messages in a clear in consistent manner, communication partnerships are imperative.

Finally, the International Food Information Council looks forward to exploring new partnerships and opportunities to communicate food guidance messages that consumers will really recognize, understand and use. Thank you.

DR. HENTGES: Thank you. We will go ahead and take a 10 minute break at this time. When we come back, our next speaker will be Jay Lavine, and I ask that you return promptly and return to your seats at that time, so that we do have time for all of the next speakers. Thank you.

(Recess.)

DR. HENTGES: Our next speaker is Jay Lavine.

DR. LAVINE: Good morning. I'm Jay Lavine, M.D., and I'm representing myself. The present food guidelines and pyramid have not been successful in changing the dietary habits of Americans. If we look at the food balance sheet data for the year 2001 from the FAO, we see that if we
exclude potatoes, Americans derive only 2 percent of their calories from vegetables, 3 percent if we include legumes in the vegetable category.

In contrast, 12 percent of calories come from beef, or meat in general, 13 percent from dairy products and eggs, and a whopping 18 percent from added sugars.

What we have failed to do is to change the way most Americans think about a meal. The prevailing conception is that meat of some kind is central to any entree, and that vegetables are mere condiments. As long as that conception remains, the goals of the dietary guidelines will go unrealized.

What we need to do is to turn things around and make whole planned foods, vegetables and whole grains central to any meal. Anything else, low fiber foods, fatty foods, sugary foods, or salty foods, should be just an option or a condiment.

The message will be to put plants on the center of your plate, and teaching people just how to do that will be the educational project of the next decade.

I would emphasize the word whole with regard to plant foods, because less healthy plant products like white bread would be relegated to the periphery. Consuming whole grains needs to be an important part of this educational message.
It should not be necessary to compartmentalize healthy foods. Many people who look at the food guide pyramid have the mistaken notion that if they fail to consume the recommended number of servings of each and every food group, they will become nutritionally deficient.

Does it really matter whether someone consumes six to 11 servings of grains and three to five of vegetables instead of the reverse? As far as I know, no one ever suffered sudden death from consuming too many servings of kale.

The fact is that many healthy foods, such as kale, by themselves cover almost the entire nutritional spectrum. So even if people decided to omit a food group, such as legumes or nuts, they would still do just fine.

The overriding nutritional principal is to consume a wide variety of healthy foods, and to minimize the less healthy foods. That recommendation avoids confusion and provides the greatest latitude and flexibility in healthy food choices that will facilitate compliance. Thank you very much.

DR. HENTGES: Thank you. Our next speaker is Karen Miller-Kovach.

MS. MILLER-KOVACH: Good morning. I'm Karen Miller-Kovach, chief scientific officer for Weight Watchers International. Thank you for the opportunity to provide a
perspective on how the food guidance system can be enhanced to help Americans establish sustainable and healthy eating patterns.

I had the privilege of attending last week's meeting of the Dietary Guidelines Advisory Committee. We believe that the committee is providing you with an outstanding foundation from which to build a new food guidance system.

The committee's recognition that a healthful diet needs to be met through a thoughtful and balanced selection of essential calories that are rich in nutrients and low in energy density presents clear direction for you.

It was apparent to all of us at that meeting that the guidelines panel places a high priority on addressing the major public health issues of overweight and obesity. The food guidance system must make this a priority as well.

When it comes to helping adults lose excess weight, no one can match Weight Watchers' experience. For more than 40 years, we've helped millions of people achieve and maintain a healthy body weight through a combination of sound nutrition, behavior modification, physical activity, and a supportive environment.

As research in healthy weight has evolved, we've used the latest evidence-based science in our programs to help our members lose weight. And contrary to the long held
assumption that weight loss cannot be maintained, we have seen through the accomplishments of our members that sustainable weight loss is possible. And we've also seen through the accomplishments of our members that how a person loses weight directly affects their long-term outcomes.

A recent study published in the May supplement of the International Journal of Obesity, looked at a national random sample of Weight Watchers members who had achieved a healthy body weight and completed a six-week maintenance phase of the program. The study showed that after two years an average of two-thirds of the participants weight remained off, and after five years about half of the weight had stayed off.

The USDA acknowledges that while almost 80 percent of Americans recognize the existing food pyramid, only 2 to 4 percent eat their meals according to its guidance. In other words, they recognize it, but they don't do it.

The current pyramid, as a food guidance system, falls short because it does not show people how to eat in a way that matches the reality that is their lives. We have a diverse population when it comes to eating, from ethnic groups with exotic food traditions, to the dietary preferences of vegetarians. More importantly, we have a myriad of mixed foods.

A slice of bread and a tomato are single foods
whose place on the pyramid is easily recognizable. But that's not what people eat. They eat tacos. They eat pizza. They eat spaghetti with meat sauce. And where do these fit on the pyramid? That's not so easily recognized. And that's where the pyramid falls short. It's recognizable and it's understandable, but it doesn't help us to make food choices in a way that matches the foods that we eat. And if it doesn't do that, it cannot succeed as a food guidance system.

It's often said, people don't eat nutrients. They eat food. We would add, people don't think or eat foods as isolated components that are organized into neat little food groups. They eat foods in combinations, as casseroles, as soups, as stir fries. And they eat meal type foods, and they eat snack type foods.

A key lesson that we've learned at Weight Watchers is that for people to make wise food choices that control calories, they must have a versatile, easy to follow way of doing it. This is the only means by which food choices can be made in a livable and sustainable way.

Americans need a guidance system that shows them how to choose familiar foods that are rich in nutrients and low in energy density, and in a way that fits within their lives. Such a system would also guide people to control caloric intake, a critical component for weight management.
Another lesson that we've learned from our extensive experience, is that a method for controlling calories alone isn't enough. People must have a supportive environment that reinforces making those healthy food choices on a daily basis.

People need a guidance system that shows them how to eat familiar foods, but also how to make those food choices within a variety of situations; situations that vary from day to day, weekday to weekend, and from week to week.

Our experience and our science-based research shows that providing people with the four mutually reinforcing pillars of healthy nutrition, behavior modification, physical activity, and a supportive environment, is a guidance system that brings about results, in our case, healthy and sustainable weight loss.

We urge the USDA to extend the food guidance system beyond a graphic depicting a single food choice, and develop a true guidance system that's easy to follow; a system that helps people reduce calories, if they need to lose weight, to choose nutrient-dense foods that are also low in energy density, and to provide encouragement for behavior modification and increased physical activity. This approach to a food guidance system can truly address the epidemic of overweight and obesity that exists in our country. Thank you.
DR. HENTGES: Thank you. Our next speaker is Robert Earl.

MR. EARL: Thank you to Mr. Bost, Dr. Hentges and the USDA staff for having this open meeting on this important topic. Good morning. I am Robert Earl, senior director for nutrition policy at the National Food Processors Association based here in Washington, D.C.

As the department prepared the next evolution of America's food guidance system, it has the critical task of making graphic communications, education, and motivational sense of dietary and food guidance for consumers. This is a great challenge.

NFPA offers the following remarks to highlight selected issues that will be amplified in written comments that we will submit later.

The current pyramid graphic may not be perfect, but it performed better than other evaluated when it was first developed. We urge the department and center to revisit what was learned during the initial development of the food guide pyramid, an experience, as well, that has been learned over a decade with the nutrition facts panel, in order to learn from the past, to prepare for the future.

Given high consumer recognition of the current pyramid, we believe that USDA should invest in refining the graphic with the majority of resources devoted to public
education materials, to support the graphic as part of the food guidance system. There's a compelling need to make the dietary guidelines, the food guidance system, and the nutrition facts panel on food labels, as complementary as possible.

For food guidance, the challenge is to foster consumer use of the current pyramid, or any revised graphic, so that it will be equivalent to its current recognition by consumers.

We believe that individual guidance should build on general messages. Educational components must motivate consumers to choose wisely, whether for a healthy lifestyle, whether for weight management, or for weight loss.

Communications messages and educational support materials must convey the spectrum of options for food products available to consumers from both fresh and processed foods. The graphic needs to be flexible and reflect the reality of the forums in which consumers purchase and consume foods, fresh, minimally processed, juice, dried, canned, frozen, and multi-component foods.

There is an abundant variety of processed foods from fresh and then minimally-processed to multi-component that provide high nutrition, convenience, and value to consumers.

Whether it be a revised food pyramid, an
adaptation thereof, or a new graphic, food manufacturers also need to be able to use the graphic to illustrate how their products informs as purchased, fit in the food guidance system. We believe this flexibility to responsibly depict individuals foods, main dishes and meals into food guidance, will encourage understanding and use by consumers. Because individualized needs of consumers and their desire to craft healthful diets as part of healthy lifestyles, we believe that multiple modes of communication and education are essential. Determining what is effective with consumers across a range of technologies, languages, cultures, and motivation levels, is critical. To achieve this, consumer understanding, testing and evaluation of general and individualized messages is absolutely vital.

A critical component of food guidance education is to inform the public about servings and portions. To that end, we want to reiterate comments we've previously made, of the need for harmony between serving and portion information across the dietary guidelines, food guidance system, and the nutrition facts panel on food labels.

To maximize consumer benefit, we believe that the food guidance system should move toward serving sizes and use of household measures that are used in nutrition labeling, and make them compatible. There will always be some tension between the food guidance and the food label,
but if consumer nutrition education materials focus on services expressed as what is used in nutrition labeling, tools such as a new food guidance system and the nutrition facts panel can be best used for wise food choices for good health.

Because of the inseparable link between physical activity and food and energy balance, weight maintenance or weight loss, parallel materials need to motivate consumers about the need for physical activity as part of a healthful lifestyle.

Food and activity pyramids for children may provide models that may serve as examples that can be used across all age groups to convey both food guidance and physical activity information.

The National Food Processors Association appreciates the opportunity to comment on these important issues. As you proceed forward with the next evolution of America's food guidance system, we encourage maximum flexibility and integration with other government-wide and public and private efforts to educate the public about how to eat and live healthful lifestyles, taking full advantage of processed and fresh foods available.

Calories count, energy balance and variety, and enjoyment of food choices are themes that make America's trilogy of tools for healthful eating, the dietary
guidelines, food guidance and nutrition labeling, a coordinated way to motivate the public to improved health.

Thank you.

DR. HENTGES: Thank you. Our next speaker will be Katherine Beals.

MS. BEALS: I'm Katherine Beals. I'm a registered dietician and consultant to the U.S. Potato Board. We appreciate the opportunity to provide input on the design and communication of the new food guidance system. We have targeted our suggestions to address the specific goals for the revision outlined by the CNPP in the second Federal Register.

Goal number one, increase consumer awareness of the new science-based food guidance system. Consumers are becoming more discerning when it comes to diet nutrition information. They need to be assured that the new food guidance system is not the result of industry and/or private party persuasion, but the synthesis and analysis of the most current scientific research.

Providing consumers with the science to support the dietary recommendations is crucial for establishing the credibility of the information, and thus consumer confidence in its validity.

Goal number two, encourage consumers to make positive changes in their food choices. The declining
quality of the American diet, and the concomitant increasing prevalence of obesity are proof that despite widespread consumer awareness of the food guide pyramid, the majority of Americans do not follow the dietary recommendations it illustrates.

This is not particularly surprising, given what we know from social learning theory, which is that simply increasing knowledge and/or awareness is not enough to promote behavior change. By the same token, dietary change requires not only knowing what needs to be done, that is awareness, but knowing exactly how to do it; that is, guidance via simple, actionable steps.

Indeed, research examining the efficacy of structured meal plans for weight loss confirms that providing specific dietary instructions promotes greater weight loss and improved weight loss maintenance.

We also know from social learning theory that behavior is shaped by reinforcements, and positive reinforcements seem to be more effective than negative reinforcements. According to a recent study by the International Food Information Council, consumers prefer positive messages that motivate and alleviate confusion about nutrition. Telling Americans that they are allowed to eat certain vegetables, but must reduce their intake of others, as implied by the daily food intake patterns, is
negative messaging, may confuse consumers, and even
discourage vegetable consumption. On the other hand,
encouraging Americans to eat the vegetables they enjoy is
positive and reinforcing.

No nutrition education tool, pyramid or otherwise,
will effectively change eating behavior if it does not
capitalize on the factors that influence food choices.
Taste, convenience, and cost are most often cited as the top
three influences of food choices.

Potatoes are perfectly suited to play the role of
sample vegetable in positive communication messages, and
education materials, since they readily capitalize on these
three influences.

Potatoes are America's favorite vegetable, proof
they taste great. Potatoes are convenient. They are simple
and easy to prepare. And potatoes are inexpensive and
widely available year round.

Goal number three, educate consumers about food
choices and amounts to eat. Learning theory tells us that
people acquire new knowledge more readily if they can build
upon existing knowledge. Thus the food guidance system
should be developed and communicated in such a way that it
builds on Americans existing eating patterns and
preferences, using foods that are well liked and familiar to
consumers in educational tools and messages.
For example, combining vegetables that are well liked and more frequently consumed, such as potatoes, with those that are less well liked, or infrequently consumed, may help meet the goal of increased vegetable consumption.

We strongly urge against the new food guidance system separating vegetables into subgroups, and more importantly making recommendations based on these groups. Such segregation will not help to meet the goal of increasing vegetable consumption, and is likely to produce the exact opposite effect.

No single vegetable provides all the nutrients needed for good health. Each vegetable has a unique nutritional profile that adds to the overall nutrient density of the diet. Thus a wide variety of vegetables should be consumed daily so as to ensure an adequate intake of all the essential nutrients.

Potatoes eaten with the skin rank highest in potassium among the 20 most commonly consumed raw vegetables and fruits. Potatoes are an excellent source of vitamin C, providing 45 percent of the daily value. Potatoes provide as much or more fiber than many whole grain foods. And potatoes have been a dietary staple for millions of people of many cultures for hundreds of years. Thank you.

DR. HENTGES: Thank you. Our next speaker is Laura Dawson.
MS. DAWSON: I'm waiting for my screen to light up, and I will, too, when that happens. Good morning, ladies and gentlemen. My name is Laura Dawson. I am a disabled individual that is a small business owner here in the United States, and I hold a masters degree in traditional Chinese medicine and acupuncture.

I became nationally certified to practice acupuncture and oriental medicine in the United States, and I'm certified by the NCCAOM. I was a participant in the National Institute of Health's consensus that brought acupuncture into the medical system in the United States in 1997.

One of the things that I find most profound in my practice in the past, and my consulting work, is the nutritional evidence of created health. So in establishing my business, Spirit of Food, in 1998, during my academics, it was dedicated to educating and to inspire and empower individuals to achieve and maintain optimum health and enjoy life more fully. This is done through using food choices to create and manage better health.

We have developed a method, food physics and body dynamics, which is trademarked, as a public interactive presentation to that end. Nutrition has been the focus of this method to improve and enhance health, thus my presence here today.
In the interest of time, I will address my comments to the pros and cons of individualized as opposed to generalized information.

The food intake patterns that are currently being looked at by ourselves for the -- excuse me, for the individualized information are age, sex or gender, and physical activity.

I would propose that two additional items are included in them, and they are climate and locale, in that a body's constitution is environmentally interactive, and also the foods that are available at that particular climate and location are important to address so that individuals are not required to eat watermelon in Alaska.


In finalizing my information to you, it is my hope that to choose to individualize the information, and continue to use the food pyramid, I recently attended a conference of 365 people in Las Vegas, and they were global. These people are in all facets of business and medicine. And I took a mini-survey and found that almost everyone had knowledge of the food pyramid. And while they could not recognize the components that were within it, they had the shape down. So they knew what to look for, for their information.
And I would propose that we put an icon path to that further location of information. Every audience member that I surveyed, did have computer access. So that appears to me to be an excellent tool and pathway to the information that you're able to provide.

It is my goal as an individual and as a practitioner, to teach. I am the person that goes out to the public. And in traditional Chinese medicine, it used to be called the barefoot doctor. And that was the person who traveled from village to village and shared information.

I'm a yadda-yadda. I happen to be better at yadda-yadda than anything else. So as I do my yadda-yadda before you today, I would like to claim that there are several types of learners. Those learners are readers. Those learners are listeners. There are also the sensory learners. But I would propose to you that the learners that are most commonly found and travel over the widest amount of individuals are those that model after roles.

I believe this to be the most profound method. And as a person who manages her disabilities with nutrition, I happen to be one of those role models. I think that, therefore, it is essential that we look at quality stakeholders to deliver the information that you as a panel created.

I would like to also state, just for a moment,
that I was a candidate to be on the panel, to write this, some of these guidelines that you people did in the year of 2002. I'm disappointed that I didn't get to be a part of that panel. I'm actually pleased that I did not have that level of responsibility. I am totally in awe of the work that you do. But I would be honored to continue that work.

My feeling is that the American public enjoys the right to independent choices. Excuse me. I'm going to take a breath. Excuse me. Excuse me. I will finish.

The American public enjoys the right to independent choice. It is one of our fundamental rights, and one of the things that we, as Americans, honor the most about who we are. Don't smile at me and I'll do a heck of a lot better. Let us support that right to choose with the knowledge to make the best choice. Thank you.

DR. HENTGES: Thank you.

MS. DAWSON: My pleasure.

DR. HENTGES: Our next speaker is Michael Jacobson.

MR. JACOBSON: Thank you very much for this opportunity to provide CSPI's comments on USDA's food guide. The current food guide pyramid was tragically flawed from the day it was announced, because it fails to distinguish between foods of very different nutritional qualities within given food groups.
Thus hamburgers and peas are considered the same. Whole wheat and white breads are equals. And skim milk, cheese, and ice cream show up in the same sector. That's a formula for dietary confusion, not healthful diets.

Regardless of the content, precious little was done to convert the guide's advice into actual dietary improvements. The government has undertaken neither policy changes, nor sponsored well-funded educational campaigns to encourage people to eat more healthful foods. Without an implementation program, the shape or content of the guide hardly matters.

USDA said it is considering using a food guide graphic more as a branding logo than an educational device, in part because improving the current triangle would make it too complicated. I disagree. Draining the graphic of content would forego an opportunity to educate consumers.

Instead, the current content should be modified by focusing on healthful foods. That is, USDA should make the symbol a healthful diet triangle. For instance, grains would be whole grains, and protein foods would focus on beans, fish and poultry, and low-fat or fat-free dairy products. A line of text could also indicate that foods should be low in sodium and that alcohol, if consumed, should be limited to one drink a day for women, and two for men.
CSPI and others have used the triangular shape to depict various diets that are far more healthful than what is described by USDA's triangle. In one case, CSPI published a triangle based on the Dash trial. And I gave Mr. Webster copy to give to you, that I assume you have, of that triangle.

Dash studies demonstrated that a diet rich in fruits, vegetables, and low-fat dairy foods, but limited in saturated fat, cholesterol, and total fat, can provide all the necessary nutrients, while lowering blood pressure and LDL cholesterol. Reducing sodium resulted in further declines in blood pressure.

A triangle based on the Dash diet would be built on a foundation of top quality, government sponsored, clinical studies.

A complementary unhealthful diet triangle could emphasis the nutrients and foods we should eat less of because of their content of saturated and transfat, cholesterol, salt, and refined sugars and flour. Translated into foods, that would include such foods as soft drinks, cheeseburger, whole milk, candy, ice cream, and french fries cooked in partially hydrogenated oil.

In that vein, CSPI published an actual pyramid which, that is there, that lists anytime foods, in moderation food, and seldom foods on three of its sides.
In the few moments I have this morning, I would like to respond to two specific questions the USDA raised. First, USDA asks about the value of individualizing messages, as opposed to disseminating messages appropriate for the general public.

It would, indeed, be useful to have advice geared to specific subpopulations, and it would also be useful to have websites that provided more detailed nutrition information based on an individual's personal characteristics.

But individualized guidance would not supplant the need for broad public health campaigns, and food and farm policies to move the whole nation toward a more healthful diet.

Mass media campaigns and policies should encourage the foods that are depicted on the anytime side of the pyramid, and the kinds of foods that many of the speakers this morning were talking about, of moving towards a more plant-based diet.

USDA also asks how, beyond printed materials, and the internet, information should be delivered to the public. Clearly, television and radio remain the pre-eminent media for mounting marketing campaigns, be they to encourage people to eat more candy bars, or to eat more fruit.

CSPI knows from the controlled studies that it has
conducted that paid mass media campaigns can actually change eating habits. Our campaigns in several West Virginia cities encouraged people to drink 1 percent and skim milk instead of higher fat milk. Those campaigns, which lasted only six weeks, as much as doubled the market share of 1 percent or skim milk, as measured by supermarket sales.

Nutrition campaigns work. What is missing are the political will and the funding to mount them. Thank you very much.

DR. HENTGES: Thank you. Our next speaker is David Katz.

MR. KATZ: Good morning. My name is Dr. David Katz. I direct the Prevention Research Center at the Yale University School of Medicine, and I'm here on behalf of the partnership for essential nutrition.

Two principal threats to effective dietary guidance are dissent and ambiguity. This morning is witness to the unavoidability of health dissent. But I appeal to your common sense. We are not clueless about the basic care and feeding of homo-sapiens. There is a forest through these trees we have climbed this morning. Please do not lose sight of it for the ruckus we are making.

Several historical follies attest to the hazard of ambiguity. The public received the message to restrict their intake of dietary fat, and sought solutions to the
problems of epidemic obesity and diabetes in boxes of Snackwell Cookies, and found neither there.

We now have a case of deja vous all over again, same basic strategy, different macro-nutrient class. We see supermarket shelves filling up with high calorie low carb foods of suspect nutritional quality, which are no better than high calorie low fat foods of suspect nutritional quality.

And another issue of ambiguity is that we admonish schools to ban vending machine junk food. We inform the public that up to a third of the calories of the typical American diet derive from junk food. And yet it is policy to state that there is no such thing as a bad food.

Does that mean that up to a third of our calories come from foods that don't exist, or that junk isn't bad? That is ambiguous, and that is an enemy to effective dietary guidance.

I believe we can do better. Eating well is not about choosing among the macro-nutrient classes. But rather, choosing well within each of them. Choosing well means, eating more of some foods, but also eating less of others. And we should not hesitate to convey that message.

And if there are junk foods, if there are bad foods, we should be neither shy nor trepidatious in pointing them out to a public in need at a time of crisis.
Those who do not learn from the follies of history are destined to repeat them. The single best way to predict the future is to create it. I implore you now to be parents, to be protectors of the public health, rather than engaged in politics as usual.

The public needs clear guidance from us about foods they should be eating more of, foods they should be eating less of. We can do better than repeat the follies of history. We can create a better nutritional future. Thank you very much.

DR. HENTGES: Thank you. Our next speaker is Maya Edmonds.

MS. EDMONDS: Good morning. I'm Maya Edmonds, director of scientific affairs with the Soy Foods Association of North America. The Soy Foods Association of North America, SANA, is a trade association of soy farmers, manufacturers, processors, chefs, and educators. SANA appreciates the opportunity to raise three key points before USDA regarding the acknowledgment of diverse eating patterns and lifestyles, as you shape national dietary guidance.

First, the new food guidance system, like the 2005 dietary guidelines, will need to provide information and messages that will assure diets can be planned to meet recommended nutrient intakes, especially for potassium, iron, calcium, fiber, vitamin D, and magnesium.
These diets must be flexible to enable individual, cultural, vegetarian, and other preferences. SANA suggests that the new food guidance system parallel the food guide pyramid for young children that acknowledges the cultural diversity in American food choices, and presents plant-based food alternatives.

Soy foods are presented in that publication as calcium-containing alternatives to dairy foods, and high quality protein alternatives for meats.

Secondly, to ensure that more legumes are included in the American diet, the new guidance system should also illustrate various versions of foods made from legumes, and show how they fit into several groups. Widely available forms of soy fit into numerous food groups of the food guide pyramid.

Fortified soy milk and cultured soy in the milk, yogurt and cheese group; tofu, soy burgers, soy nuts and soybeans in the meat, poultry, fish, dried beans, eggs and nuts group; fresh soybeans in the vegetable group; and baked goods made with soy flour into the bread and grain group.

Third, soy foods that provide high quality protein and key nutrients without contributing saturated fat, cholesterol, or excess energy have become a fast growing part of the American diet. In 2003, one in six Americans incorporated some form of soy into the diet at least once a
week, according to a United Soybean Board survey. This finding parallels the increasing sales of soy foods that grew from 862 million in 1992, to reach 3.65 billion in 2002, about a 15 percent annual growth.

In supermarkets across the United States, thousands of forms of soy foods are available to meet the taste preferences of Americans. The new food guidance system should feature a wide variety of foods to help all Americans, regardless of cultural, ethnic, or health food preferences, meet the 2005 dietary guidelines.

SANA appreciates this opportunity to testify on the role of soy in the food guidance system, and looks forward to providing any additional information that may be needed in additional deliberations. Thanks.

DR. HENTGES: Thank you. Our next speaker is Connie Diekman.

MS. DIEKMAN: Good morning. I'm Connie Diekman, director of University Nutrition at Washington University in St. Louis, Missouri. Thank you for the opportunity to offer comment on the design and implementation of the proposed food guidance system.

Americans are heavier than ever, and conflicting nutrition messages are in the news everyday. As a registered dietician I applaud the committees leadership in proactively looking for solutions that will address these
issues to help guide Americans to make better health and lifestyle choices.

It is important to consider the high level of recognition the pyramid shape has attained as a symbol of food guidance. Dieticians use it as a teaching tool. My students recognize it. And it's on millions of food packages. Changing the shape now would mean abandoning the base level of awareness it has established.

Instead, the USDA can capitalize on the pyramid recognition by evolving the graphic, to more clearly convey two things for consumers. One, what balanced intake of food and nutrients looks like; and two, clear portion messages.

On balanced intake, the new pyramid should help Americans choose a balanced eating plan based on current science. The USDA and the dietary guidelines advisory committee have both emphasized the importance of eating nutrient rich foods. Science has shown that many foods and nutrients can promote better health and when as part of a balanced eating plan, may even help reduce the risk of serious health problems like obesity, diabetes, and hypertension.

On clear portion messages, the USDA's proposed strategy to motivate and create awareness through the new graphic suggests it is not to be used as a stand alone educational tool. However, in this time of over
information, it's likely to be used alone, including many food companies who simply don't have room on packages for much more information. In this scenario, the pyramid with no numbers indicating how much of a food group is not likely to help anyone.

The simplified symbol should include clear portion messages. Simple, actionable messages, such as three a day of dairy, and five fruits and vegetables a day have increased consumer awareness about the number and the size of portions they should get from those food groups.

The proposed strategies for educational components suggest a focus on core messages, instead of the graphic to represent educational messages. This requires three steps from an individual.

Look at the graphic. Read the messages. And then go on line and follow instructions. We live in a very time crunched world where moms want five minute recipes with three ingredients that the family will eat and like. This approach may be too much work for today's world.

The graphic should convey consumer-friendly guidance messages that are tested to convey motivation for the consumer. Specific serving recommendations for each food group, based on the 2000 calorie eating plan, may be less confusion and more actionable for Americans. This corresponds with the nutrition facts label, and my represent
an opportunity to work with FDA to communicate proper portion sizes and keep nutrition messages consistent. The core messages could motivate consumers to seek additional information through printed materials or on-line. In this technological time, interactive tools allow consumers to assess nutritional intake in the privacy of their homes, providing them immediate, individualized feedback. And this helps them feel in control. Making lifestyle changes is easier when the individual is involved. Interactive tools give the consumer that opportunity. Once the new food guidance systems is released, the USDA can encourage coordinated consumer education efforts by facilitating partnerships among groups, including the educational community, industry, and government. And finally, to help ensure the food guidance system is effective in motivating change among Americans, I suggest you synchronize it with the nutrition facts panel. You keep it simple, relevant, and actionable, as best you can. Thank you very much.

DR. HENTGES: Thank you. The next speaker is Jennifer Tong.

MS. TONG: Good morning. My name is Jennifer Tong, and I am the director of food safety and nutrition outreach for the United Fresh Fruit and Vegetable
As the produce industries oldest national trade association and public policy advocates for producers, wholesalers, distributors, brokers and processors of fresh fruits and vegetables, we have long supported scientific evidence endorsing the health benefits associated with a varied diet based on fruit and vegetable consumption.

We commend the USDA Center for Nutrition Policy and Promotion for initiating a broad-based review and update of the food guide pyramid. The revised consumer presentation to be known as the food guidance system, is a critical step in helping consumers develop and meet nutritional objectives. We are hopeful that the new system will meet its intended objectives of encouraging consumers to make positive changes in their food choices, and educate them about the amounts and types of foods to eat, resulting in increased fresh fruit and vegetable consumption.

Given the unfortunate statistics relating to fruit and vegetable consumption, which still remain below the current recommended levels of five servings per day, United believes that it is time for the government to refocus its efforts and develop programs such as the food guidance system that aggressively address this problem.

I would like to briefly comment on the elements that United believes should be strongly considered as part
of the proposed guidance system. We believe that the incorporation of these suggestions will help the American consumer clarify the important health benefits of consuming a variety of fruits and vegetables as recommended in the dietary guidelines for Americans.

First, we believe that the new food guidance system must be easy for consumers to understand and use while moving Americans to make real positive dietary changes. The food guide pyramid has been a good tool, but has not been effective in helping Americans change their diet to reflect its recommendations.

Fruit and vegetable consumption data alone tells us that the average American eats only one and a half servings of fruits, and 3.3 servings of vegetables daily. Moreover, more than 75 percent of US residents fail to meet the pyramid's minimum recommendation of five daily servings of fruits and vegetables in 2000.

Therefore, the new system must incorporate strong dietary messages that are not only educational, but motivational as well, driving consumers to live healthier lifestyles.

The revised guidelines must also clearly reflect that fresh fruits and vegetables are the cornerstone of healthy living. Science tells us that diets rich in fruits and vegetables can greatly reduce the risk of chronic
diseases such as cancer, diabetes, and coronary heart
disease. In fact, recognizing current science, the draft of
the revised dietary guidelines calls for Americans to eat
five to 13 servings of fruits and vegetables daily,
increasing the current recommendation of five to nine.

Because fruits and vegetables are a vital
foundation to optimal health, it is critical that they are
not lost within the new guidance system. Fruit and
vegetable consumption information must be the foundation of
any graphical representation depicting good eating habits.

Further, if the current food guide pyramid makes
total diet recommendations, and notes that consumers should
be eating five to nine servings of fruits and vegetables
daily, but it provides no overall health messages specific
to the food groups.

We believe that consumers will increase fruit and
vegetable consumption if they fully understand their
importance to overall health. With this in mind, we feel
that the agency must incorporate dramatic messages relating
the health benefits of fresh produce consumption to
consumers in the revised system. These messages must be
strongly communicated graphically, and in a narrative
format, and should not be buried in the overall framework of
the new guidance.

The guidance should also be strengthened to
communicate the need for Americans to consume a wider variety of fruits and vegetables. Economic research service data from 2000 tells us that potatoes, iceberg lettuce, and canned tomatoes accounted for 48 percent of US vegetable consumption, and that oranges, apples and bananas made up one-half of the daily fruit servings consumed.

Clearly individuals are not reaping the benefits of eating a variety of fruits and vegetables, and as such may be missing the health promoting nutrients unique to various fruit and vegetable items. Therefore, the new guidance system must strongly convey and support the variety messages, and it's importance to healthy living.

Finally, I would like to share our view of the advantages and disadvantages of retaining the current shape of the graphic, and other potential shapes to use as a representative of the overall food guidance system.

We believe that the current graphic has not been wholly successful in changing overall consumer diets, but do not feel that it's lack of widespread success is the result of its shape, a pyramid. We believe that the graphic shape may be inconsequential. Pyramid, circle, square, or the myriad of other options available.

What we believe is needed is better public communication and messaging concerning the system's dietary recommendations. Since the pyramid has achieved a wide
level of recognition among Americans, the agency may want to consider building upon its current foundation. But we are certainly open to exploring other graphical representations, such as pie charts, bar charts, and the like, that might convey a greater understanding of proportions within the diet. In fact, we encourage USDA to test all of these formats.

United believes that these suggestions will add clarity to the proposed nutrition guidance system to ensure that the American public is fully aware of the sound science and the most recent recommendations that have clearly identified the health and prevention benefits of increased produce consumption. Thank you.

DR. HENTGES: Thank you. Our next speaker is Edward Siguel.

DR. SIGUEL: I'm Edward Siguel. I am a Ph.D. I am speaking for myself. My representation will be over-simplified, due to the space and time restrictions, and I refer people to my website, Essential Fats, where there are articles, and to the NIH Medline.

I study the effects of different types of fats on health and disease. In my presentation, I will use the word essential fats to refer to certain types of polyunsaturated fats such as the Omega-3 and Omega-6.

I invented a method to measure different types of
fatty acids transfers in blood. I created a database of fatty acid profiles from over 1000 blood samples from patient subjects, and from heart study subjects.

Based on my presentations at the scientific meetings, published articles, and personal conversations with over 100 fat researchers, I believe I have the best data on the relationship between fats in blood, health and disease, and I will summarize a few findings.

I found that excessive calorie intake from foods low in essential fats creates a biochemical deficiency of essential fats in humans. Most overweight people have this biochemical deficiency of essential fats, unless they became overweight from eating too many healthy foods, a rare situation here.

More than one-fourth of the US population appears to be biochemically deficient in Omega-6, more than 50 percent deficient in Omega-3's, based on biochemical measurements of fatty acids in blood.

Contrary to popular belief, I don't think there is a substantial biochemical difference in the long term between whole grains and processed grains. The distinctions are very subtle, and too complex for most people. It's easy to distort these differences and provide empty calories from cookies that use whole grains.

The essential fats are far more important than
trans and other fats. Total, the total cholesterol to HDL
ratio, a very well know marker for heart disease, is
inversely proportional to essential fats and directly
proportional to transfats. Essential fats account for about
50 percent of the variance, and the trans for about 10
percent. The levels of essential fats appear to be, by far,
the most significant factor in cardiovascular diseases of
normal lipids, diabetes, and hypertension. Other factors
are minor in comparison.

Using as a criteria the R-squared variability,
where most biologists rely on 10 percent, and I have shown
the total situation that was predicted by more than 50
percent by elevation of essential fats.

The transfatty acids in blood, I found, are burned
fairly quickly. It is the lack of essential fats that is
more important. It is eating too many calories and not
enough essential fats is far more harmful than eating too
many transfats.

We must beware of monos. They are mostly
unnecessary. It is well known that monos are not
biochemically essentially. I suggest the recommendations
should emphasize essential fats, not unsaturated fats that
includes monos.

My research has shown there is a direct inverse
relationship between the blood levels of monos and the blood
levels of polyunsaturated fats.

This is a graph that shows if we measure the fatty acids in blood of humans, and we plot the levels of monos and the levels of essential fats, for different populations, for different diseases, and different levels of nutritional status, it is pretty much a straight relationship. What this basically means is that the body will make more or less monos in response to the diet. If we eat more monos, the body makes less. If we eat less, the body makes more. But in the end, they balance out and it is in balanced proportion to the essential fats.

If we look at the relationship between total HDL and the transfats, I found a fairly straight relationship, so that the more polyunsaturates we eat, the lower the level of the total HDL ratio. The more trans people eat, the higher the level of total HDL. By context, the essential fats are far more important, roughly like 10 times more important than trans.

So recommendations that put emphasis on monos and trans, and don't put enough emphasis on essential fats are missing the point.

We should keep, use the key principals. Too much information on levels of food and nutrition recommendations is not very practical. I learned I cannot cover a computer every day and try to type all the information to figure out
how much I am eating. Even the simple food pyramid is far
too complicated from day to day.

I found in my experience a message that is much
simpler. I emphasize total calories and cells. I tell
people they should eat natural foods with cells. They
should eat, eating foods without cells is all the foods
without cells are fairly similar. And they should eat foods
with cells and membranes, and they should emphasize calories
from vegetables.

And as a way of a reminder, I tell people to use a
very simple diagnostic technique for overweight and
viscosity. I call it the belt. You use the belt and you
mark it yourself. And you see where you are every day.

As I told the secretary of HHS, if you a month ago
only make your hearings, the best three-minute technique
that I found is duct tape. If you think that you are
getting a little bit too much in your belt, you put the duct
tape on your mouth. If you use it for 30 days, it will
stop, no matter what your biochemical metabolism is. It is
100 percent guaranteed to lose weight. I am taking bets
from anyone who disagrees.

The food pyramid, I have, my food pyramid which I
roughly sketch here is basically based on the council of
using foods that contain natural cells, and they are
natural. Vegetables, some fruits, lean meats and eggs, and
then on the top I put the grains and sugars and stuff like that. And people can understand the concept of eating natural foods that contain cells.

DR. HENTGES: Dr. Siguel, we do need to wrap up.

Thank you.

DR. SIGUEL: Just keep the message simple to these concepts, and I hope it will help. Thank you.

DR. HENTGES: Thank you. Thank you. Our next speaker is Annette Dickinson.

MS. DICKINSON: Good morning. I am Annette Dickinson, president of the Council for Responsible Nutrition. CRN is a leading trade association for the dietary supplement industry.

The food guide pyramid is a powerful and flexible tool for consumer information that can be modified in numerous ways, either to reflect public policy, or to embody the views of groups that disagree with public policy, as you have seen this morning.

This power and flexibility, I believe, is an asset. And the existence of numerous modified versions of the pyramid is a testament to its utility, and the appropriateness of it in conveying complex concepts. It would be a shame to consign such a valuable tool to the rubbish heap, and the Council for Responsible Nutrition urges you to retain it with appropriate additions or
modifications, as necessary. We congratulate you for your current efforts to increase consumer motivation, and improve consumer understanding of the latest science-based nutrition guidance, regarding the total diet, and also for seeking to place that guidance in the context of a total lifestyle.

For about two-thirds of American adults, dietary supplements are an integral part of their total diet, and represent one of the many choices health conscious people make as part of their overall approach to seeking wellness.

Accordingly, dietary supplements should be taken into account in some fashion, in the design of a revised pyramid or other graphic approach to diet and lifestyle guidance, along with other elements such as the need for regular physical activity.

While dietary supplements should never replace efforts to consume the healthiest diet possible, they are a scientifically sound, convenient and affordable way to ensure that Americans reach their nutrient intake goals.

In a society where the majority of us are eating too much, too often, there is a potential danger in ignoring the fact that conventional foods, because they inevitably provide calories as well as nutrients, may not always be the optimal mechanism for increasing the intake of specific nutrients recognized to be in short supply.
Several alternative pyramids usefully illustrate a number of approaches to incorporating dietary supplements, physical activity, and other aspects of the healthy lifestyle into the pyramid graphic. For example, the healthy eating pyramid developed by Harvard University, sits on a base of daily exercise and weight control, includes calcium supplements within the body of the pyramid itself as an alternative to dairy products, and features side bars indicating that multi-vitamins are recommended for most people, and that alcohol should be used only in moderation.

These concepts are conveyed simply and directly in a manner that is no more complex than the interpretation of the basic food guide pyramid. Scientists at Tufts University have developed a modified pyramid for the elderly that sits on a base of water to emphasize the importance for the elderly of getting at least eight glasses of water a day. And it also has a supplement flag on the top of the pyramid as a reminder that supplements of calcium, vitamin D, and vitamin B-12 may be needed to provide optimum nutrient intake in the elderly.

Naturally, CRN likes the idea of a supplement flag on top of the pyramid. But this is only one of many graphics that could be used to effectively convey the importance of appropriate supplementation and its role as an integral part of the total diet, and of a healthy lifestyle.
The pyramid is widely recognized as an icon of nutrition guidance. CRN suggests modification of that icon to reflect the updated advice to be offered by the dietary guidelines committee.

In addition, however, we urge that CNPP be open minded in considering appropriate ways to give consumers realistic and practical advice that includes dietary supplements as a rational tool for increasing nutrient intakes, when a hectic lifestyle and the search for weight control combine to undermine the ideal of getting all nutrients from conventional foods. Thank you very much.

DR. HENTGES: Thank you. Our next speaker is Robert Sindt.

MR. SINDT: I thank you. I am Robert Sindt, appearing on behalf of the US Dry Bean Council. Let me just first say, the US Dry Bean Council is a private trade association that represents US growers, shippers, dealers, packers, and canners of US dry edible beans.

It is comprised of a number of state and regional grower and dealer associations and individual companies. And the dry edible beans that are grown in this country include nearly 20 different varieties grown in about 20 states, including pintos, kidneys, navys, Great Northerns, pinks, reds, limas, in those categories.

On behalf of USDBC I am pleased to make these
brief comments as you review the current food guidance system. And I would like to make comments in two specific areas regarding terminology. But first I would like to just note that dry beans have historically had an important role in the US diet, and have long been recognized as having healthful, multiple healthful and nutritional qualities as a healthy whole food.

And dry beans are low in fat, sodium and cholesterol, and are a good source of protein, fiber, vitamins, minerals, and complex carbohydrates. As such, they are recognized as a significant component of the present food pyramid and food guidance system, and a main nutrient in the meat and beans group, and a part of the legumes subgroup in vegetables.

As you complete your review, we would certainly urge you to maintain and give strong consideration to enhancing the standing of dried beans, given their healthful and nutritional qualities as you look for adopting changes in the current pyramid or in other graphic presentation.

Beyond that, we would like to stress a couple of points, however, with the current terminology used in the graphic presentation of supporting materials. And this is because of our concern that the whole focus of the exercise is to make sure that we have consumer understanding, certainly lack of misunderstanding as among consumers,
through the use of your current terminologies. And we are concerned that the use of the term legumes in the supporting educational materials of the food guidance system is confusing. And we believe that beans should be used in the food guidance system to refer to these foods.

And we reach this conclusion based upon consumer studies that have shown that beans, the term beans, is a term most commonly understood and used by consumers to refer to individual types of beans, such as black beans, kidneys, and all the rest.

And I would associate myself with the comments of others here earlier, that in your review, one of the best sources of information, as you make your determination, is on the basis of consumer studies, and what we see from that. So specifically, I would like to refer to two studies among separate but nationally representative samples of 500 consumers that were conducted in the continental United States, that reached two important points, we believe.

One is that the understanding, that there is an understanding of the term beans, but not legumes. The study concluded the consumers lack in understanding of which foods constitute the category of legumes, but better understand and appreciate what is included in the category of beans.
And specifically, for example, 80 percent of consumers were able to identify specific types of dried beans as beans, and only 60 percent identified them as legumes. There were similar results with other types of beans, such as black and kidney beans. And only about, there were 40 percent of the respondents in the survey had difficulty understanding the term legumes, or how it was defined.

Further, and secondarily, there was a clear understanding of the term beans versus dried beans. 70 percent of the consumers believed that the key difference between dried beans and beans is whether or not they had been processed, and only 35 percent mentioned a specific type of bean when asked and commonly just referred to it as beans.

So consequently, our concern for clearer consumer understanding in making dietary choices as a result of that we would urge you to consider the use of the term beans, instead of dry beans or legumes in your messaging and tools that you're developing for the food guidance system. We believe that it would be helpful both to the consumer understanding, and education, and would go, be one of the things that goes to the heart of what you are trying to do in this process.

With that, I would say, thank you for the
opportunity to make these comments. On behalf of the US Dry Bean Industry, we urge your consideration to them, and to our written comments, which will also be filed. Thank you.

DR. HENTGES: Thank you. Our next speaker is Anne Banville.

MS. BANVILLE: Good morning. I'm Anne Banville, vice president domestic promotion, USA Rice, representing the producers and millers of US grown rice. We're pleased to be here today and submit comments. We will submit detailed comments by August 27th, but today would like to make four key points.

The first is, we urge you to keep the current pyramid shape, and the reasons for that is because the current food guide pyramid accurately depicts the recommended food guidance, and because of its extraordinarily high level of consumer recognition and acceptance, CNPP should build upon the brand equity of the current pyramid, rather than change it.

The rice industry commends USDA for using sound science as the basis for this visual graphic. The choice of a pyramid shape accurately depicts intake patterns and messages of variety, proportion, moderation recommended by the dietary guidelines and other expert panels, including the NAS, Science Institute of Medicine.

According to USDA's own figures, 80 percent of
Americans recognize the graphic. A 2002 gallop pole conducted by the Wheat Foods Council showed that 82 percent of those surveyed agreed that the food guide pyramid is the foundation of a sensible, healthful eating plan. This level of recognition and acceptance is enviably high, and should not be taken for granted or abandoned as USDA works toward the goal of motivating behavior change, which really is the current need, as we see it.

So to summarize, the shape is not the problem. The shape is the basis for going to the messaging, and then the implementation which we think is the key in the coming round.

The second point we'd like to make is that the grain group should form the base of the graphic in order to convey the correct proportion message. The 2000 dietary guidelines for Americans states, foods made from grains help form the foundation of a nutritious diet. They provide vitamins, minerals, carbohydrates, and other substances that are important for good health. Grain products are low in fat, unless fat is added in processing, in preparation, or at the table.

To convey the correct proportion message of the food guidance recommendations, therefore, grains should be depicted at the base of the pyramid, or whatever shape the graphic takes.
A very important other point, whole grains and enriched grains should not be separated. Separating whole grains from enriched grains would be confusing to consumers and could imply that enriched grains are not recommended.

While we support the goal of consuming more whole grains, it should not be at the expense of enriched grains. Enriched grains provide many nutrients, and are the source of 62 percent of the folic acid in the diet.

And as we are seeing more and more scientific studies are coming forward showing the value of folic acid. We've already seen it and its impact on decreasing birth defects, but coming forward is more about birth defect reduction through folic acid. And certainly CDC and others have come forward with very strong research regarding heart health and the relationship of folic acid. So for all those reasons, we feel it is important to keep stressing the enriched grains for the folic acid and other benefits.

As we have observed the Dietary Guidelines Advisory Panel's deliberations, we are concerned the draft language in the panel's documents strongly discourages the consumption of any other type of grain food besides whole grains. Indeed, we've heard that attitude reflect here today, certainly the value of whole grains.

We strongly disagree with this direction, and urge the new food guidance system to position enriched grains
equally within the grain category. Scientific evidence shows that enriched grains, such as enriched white rice, have played an overall beneficial role in improving public health.

We point to the federal government's mandate to add folic acid to enriched grain as a cost of public policy science that has produced dramatic results. The rice industry is proud to participate in a program that says, that has so vastly improved infant health.

Now, having required the grain industries to enrich their products, and since women of childbearing age are advised to seek out and consume such products, it would be a disservice to both the public and the grain industries to in any way imply that enriched grains are to be avoided. Since it would also be contrary to the government's nutrition advice to women, it would not serve the goal of harmonization of food guidance that USDA and HHS are seeking in the current 2005 revisions.

And finally, we urge that the over-arching message coming from the new food guidance system be the importance of total calories. We urge CNPP to refocus consumers on the importance of total calories in healthy eating and weight management.

With all the media hype about fad and extremist diets, which create nutritional deficiencies, and which are
difficult to adhere to, consumers seem to have lost the
calories in, calories out focus. This needs to be the over-
arching message of the new food guidance system.

Thank you. And I will close by saying that USA
Rice stands ready to assist with the implementation of the
new food guidance system. Thank you.

DR. HENTGES: Thank you. Our next speaker is
Martha Marino.

MS. MARINO: On behalf of the National Dairy
Council, I would like to thank the committee for the
opportunity to comment on the proposed food guidance system.
I am Martha Marino, registered dietician and director of
the Food and Health Program for the Washington State Dairy
Council.

I would like to start by commending USDA and HHS
on their science-based approach in using nutrition research
to develop recommendations for the new dietary guidelines
for Americans. As CNPP develops the food guidance system's
graphic representation and educational components, it also
will be critical to use a science-based approach in using
consumer research.

Despite the 1992 release of the food guide
pyramid, American children and adults have become
increasingly overfed and under-nourished. As nutrition
professionals, we need to study the reasons why people have
been unable or unwilling to put into practice the guidelines that we have promoted.

Through careful consumer testing and research, we must validate the communication tools that will bring the new dietary guidelines to life, that really will lead to increased knowledge and improved dietary behavior.

This means taking the time to test proposed communications with children and adults, with people of varying literacy levels, with Americans of various ethnic backgrounds, so that we have a reasonable expectation that our efforts will be effective.

Regarding CNPP's question about the shape of the graphic, research suggests retaining and simplifying the current shape. USDA research shows that there is a strong recognition of the pyramid shape, including the five food groups.

Since consumers are confused and frustrated with ever changing nutrition advice, it seems wise to stick with an image that they find familiar. The problem is that people don't use it. Rather than come up with a new graphic, it makes sense to build on existing consumer knowledge, with effective educational and motivational tools.

USDA has proposed replacing the current graphic with a branded icon, not necessarily including food
groupings or serving recommendations, which would then further direct people to a website or a booklet. And icon on its own may not be clear enough for consumers, as research shows a full 75 percent of Americans are not familiar with how to use the pyramid. Consumers may not be motivated to respond to a simple icon, even if it is in the recognizable pyramid shape. However, incorporating simple, educational messages into a pyramid graphic, such as a target number of servings, would clearly and immediately communicate the US dietary guidelines.

One idea for the graphic that may be more actionable and less confusing is to specify a single serving recommendation for each pyramid food group, based on a 2000 calorie diet. New research suggests that nearly 60 percent of people generally recognize how many calories they should eat, so a reference point of 2000 calories may provide clearer guidance.

In addition, this 2000 calorie pyramid would correspond with the information on the nutrition facts labels of food packages.

Simple messages such as three a day of dairy and five a day of fruits and vegetables have increased awareness of how many servings of those foods to eat each day. Similar messages may also be useful for the food guidance
system. Another simple message is eating naturally nutrient rich foods, such as fruits, vegetables, whole grains, lean protein sources, and nonfat or low-fat dairy products.

With an increased focus on making calories count, it's even more important for Americans to maximize their nutrient intake by choosing naturally nutrient rich foods first.

CNPP asked for comments on using interactive educational tools. For the past 27 years, I have worked as a nutrition educator in both the public and private sectors. I've work for the food stamp program, for WIC, five a day, and two universities. Over those three decades, nutrition education tools have evolved from purple mimeographed handouts and film strips, to sophisticated social marketing efforts and interactive web-based programs.

Using computer technology, web users could be able to individualize their food guidance system not only for calorie intake levels, age, and sex, but also for other key factors that may drive food choices more than health: taste, cultural preferences, convenience and cost.

While we recognize that USDA may have limited resources to create and distribute educational tools about the pyramid, looking to public/private partnerships, such as a dietary guidelines alliance, may be a part of the solution.
Finally, I firmly believe that among our many messages, we should encourage families to enjoy eating meals together. Both children and parents benefit from communication that takes place around the table, and they eat better when they eat together. Family meals are associated with higher intakes of fruits, vegetables and dairy products, all under-consumed food groups.

More information on these points with supporting research will be included in our written comments. Thank you.

DR. HENTGES: Thank you. Our final speaker today is Phil Perkins.

MR. PERKINS: I guess I get to say good afternoon, instead of good morning. My name is Phil Perkins. I'm the senior vice president of research, development, and innovation for Bush Brothers.

Let me start by saying, Bush Brothers and Company commends the USDA programs to revise the food guide pyramid, and we really appreciate the opportunity for public comment. We are supportive of, and encouraged by the solid scientific approach being used to revise the pyramid.

We really have only one suggested recommendation that's based on consumer research we conducted in October of 2003, which was designed to address consumer understanding of terminology used in the current dietary guidelines.
In the proposed food guide pyramid and supporting information the term legumes and dried beans is used in a number of places. Legumes in the vegetable section as one of the five categories. And we've heard legumes mentioned at least 10 times this morning.

The consumer research shows us very clearly that 57 percent of Americans do not know what a legume is. So we recommend using the term bean in place of the term legumes, wherever it's mentioned in the supporting documentation. This will provide more effective guidance to consumers, they'll understand it more clearly, and it will help them make their food choices in alignment with the recommendations and the scientific background.

The only commonly consumed legumes that are not associated with the term beans are peanuts and peas. I think it's clear that peanuts are not meant to be included in the vegetable section, and peas are readily associated by consumers as a green vegetable. So using the term beans to replace legumes will not, in any way, change what the intention of the recommendations are.

The consumer research will be provided to you with our written comments before the 27th, so you can get the full data set. There is a lot more data there than that one nugget I shared with you.
And I really want to finish with reference back to Mr. Bost, the first speaker, that I think did a really good job of kicking off this entire session. What he said was, what we do doesn't make any difference if people don't use it. Well, if they don't understand it, they can't use it. And 57 percent of Americans don't understand what a legume is.

So with that, I thank you for the time. I thank you for the opportunity. And thank you for allowing me to be here.

DR. HENTGES: Thank you. This concludes our session. But I definitely want to again state that we are very grateful to the time that everybody took to prepare these comments, and we are also grateful that everybody stayed within their time in providing this information.

We look forward to receiving your written comments, and being able to move forward and post all this on the web for your review. Thank you very much.

(Recess.)
CERTIFICATE

DEPOSITION SERVICES, INC., hereby certifies that the attached pages represent an accurate transcript of the electronic sound recording of the proceedings before the Center for Nutrition Policy and Promotion, Food Guidance System Public Comment Meeting.

Teresa S. Hinds, Transcriber