

CRN Oral Comments to the USDA 2010 DG Advisory Committee

The Council for Responsible Nutrition (CRN) appreciates the opportunity to provide the USDA 2010 Dietary Guidelines Advisory Committee with these oral comments. CRN is a Washington, DC-based trade association representing the dietary supplement industry. Our members include some of the largest and most well known manufacturers of dietary ingredients and dietary supplements.

- Dietary supplements, as the name implies, are intended to supplement, not replace, a healthy diet.
- Survey data continue to show that Americans still fail to achieve recommended intakes of a variety of essential nutrients; even those who use dietary supplements have only modestly better diets than non-supplement users, suggesting that judicious use of dietary supplements will help to fill nutrient gaps and leave people better off. This is especially true for certain subgroups of the population who are at high risk for inadequate intakes, including women of childbearing age who may become pregnant and those in the first trimester of pregnancy, and the elderly.
- CRN urges the DGA 2010 Committee to consider the positive public health implications of recommending a simple, inexpensive multivitamin to fill essential nutrient gaps, such as for vitamins E, C and A, where consumers continue to fall short.
- Americans also have inadequate intakes of calcium, magnesium, potassium, fiber, vitamin D and long chain omega-3 fatty acids through diet alone. Obtaining adequate amounts of vitamin D and long chain omega-3's in particular may be difficult if not impossible through diet alone, making supplementation an important alternative.
- CRN encourages the Committee, in its evidence-based review process to not just focus on the randomized, controlled trial (RCTs), but to evaluate the totality of the evidence, including observational data that demonstrates a consistent relationship between adequate intake of these essential nutrients and the reduced risk of chronic disease. Observational evidence supporting the appropriate use of dietary supplements to complement a healthy lifestyle that includes a sound diet and plenty of exercise, should be given adequate

weight by the Committee's, in the same way observational evidence serves as the basis for recommendations for fruit and vegetable intake.

Thank you.

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