



## Council for Responsible Nutrition

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Food Guide Pyramid Reassessment Team  
USDA Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

### **RE: Comments on The Food Guide Pyramid**

The Council for Responsible Nutrition (CRN) appreciates the opportunity to comment on USDA's review of The Food Guide Pyramid. CRN shares the agency's commitment to providing consumers with the most current nutritional standards to help them assess and improve their diets.

The Council for Responsible Nutrition is one of the industry's leading trade associations. CRN represents a wide range of manufacturers of dietary supplement ingredients and of finished products, including national brands and store brands available in the mass market and products distributed through natural food channels, as well as dietary supplements marketed through direct sales and by mail order.

USDA Center for Nutrition Policy and Promotion (CNPP) has solicited written comments on revisions to The Food Guide Pyramid. CRN respectfully submits the following suggestions for consideration by the Center.

### **Scientific Evidence**

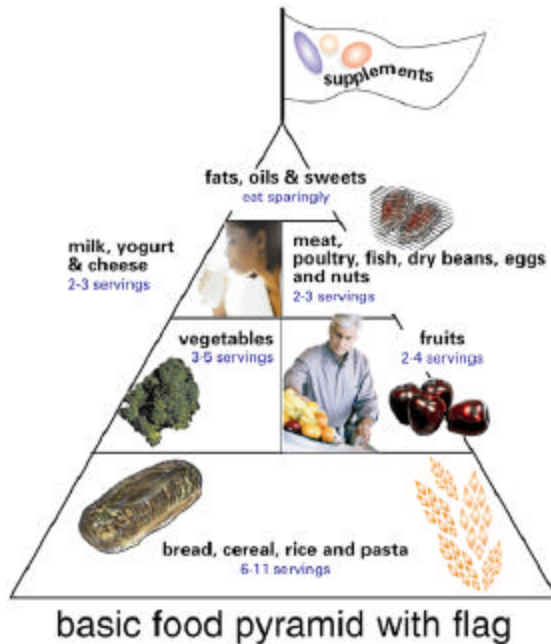
There is a growing body of scientific research that indicates the important role that dietary supplements, particularly the multivitamin, play in a good nutrition program and overall healthy lifestyle.<sup>1</sup> In addition, this evidence combined with economic studies suggests the appropriate use of some dietary supplements can promote good health as well as help reduce the risk of certain diseases, thereby potentially reducing health care costs.<sup>2</sup> Consequently, we urge the USDA as it evaluates The Food Guide Pyramid and the important health advice it offers consumers, to consider incorporating the consistent and appropriate use of dietary supplements, and specifically the multivitamin, as part of advice to consumers on good dietary habits.

For example:

### 1) Adding a “supplement flag” to The Food Guide Pyramid

Scientists at the USDA Human Nutrition Research Center on Aging at Tufts University have given careful thought to the nutritional needs of the elderly. Older people have lower energy needs and tend to eat less. A national survey showed that about 40 percent of people over 70 consumed less than 2/3 of the recommended energy intake, making it difficult to get recommended amounts of nutrients. Calcium, vitamin D, and vitamin B-12 are of particular concern in the elderly. The researchers emphasize the importance of educating older Americans to select nutrient-dense foods within all the food groups. To assist in nutrition education, the scientists have developed a modified Food Guide Pyramid for the elderly. It sits on a base of water, emphasizing the need for at least 8 glasses of water daily. Symbols are added to encourage the consumption of more fiber-rich grains, fruits, vegetables, and legumes. “Finally, a flag should be placed on the top of the 70+ Food Pyramid indicating that supplements of calcium, vitamin D and vitamin B-12 are frequently appropriate to promote optimal health.”<sup>3</sup>

Building on the model developed by researchers at the USDA Human Nutrition Research Center on Aging at Tufts University, the Council for Responsible Nutrition has developed a food guide pyramid with a flag on top as a reminder that most people should add one or more nutritional supplements as components of their daily dietary regimen.



### 2) Adding a sidebar recommending multiple vitamins

In the June 19, 2002 issue of *JAMA* (Journal of the American Medical Association), two Harvard researchers reviewed more than 30 years of articles about vitamins in relation to

chronic diseases and published their findings in two companion articles, stating their recommendation that "...all adults take one multivitamin daily."<sup>4,5</sup>

Also, in a book about diet and health, Dr. Walter Willett offers a "Healthy Eating Pyramid" that places more emphasis on whole grains, decreases the emphasis on dairy products, and relegates refined grain products as well as red meats and butter to the tip of the pyramid, along with sweets and fats—to be consumed "sparingly." A sidebar accompanies the pyramid, recommending "**multiple vitamins for most.**"<sup>6</sup> (emphasis added)

## Conclusion

There is no question that the amount of scientific evidence in favor of consistent use of vitamins, particularly multivitamins, is formidable and must be taken seriously, both by the medical community and by those who create public policy. Research suggests that regular use of some dietary supplements is a sensible choice for most people. Key nutrition researchers, government nutrition policies, and health professional groups increasingly recognize the fact that despite best efforts, most people do not get an optimal amount of nutrients by diet alone. As we continue to educate and improve consumer behavior in that area, we need to also recognize that supplements, while never serving to replace healthful eating, are a convenient and affordable way to bridge the nutrition gap.

We appreciate this opportunity to provide comments on some aspects for the revision of The Food Guide Pyramid.

Respectfully,



Annette Dickinson, Ph.D.  
President

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<sup>1</sup> Dickinson A. *The Benefits of Nutritional Supplements*. Council for Responsible Nutrition, Washington, DC, 2002.

<sup>2</sup> DaVanzo J, et al. "A Study of the Cost Effects of Daily Multivitamins for Older Adults." The Lewin Group, October 2, 2003 [press release].

<sup>3</sup> Russell RM, Rasmussen H, Lichtenstein AH. Modified food guide pyramid for people over seventy years of age. *J Nutr* 1999; 129:751-753.

<sup>4</sup> Fairfield KM, Fletcher RH. Vitamins for chronic disease prevention in adults: scientific review. *JAMA* 2002; 287:3116-3126.

<sup>5</sup> Fletcher RH, Fairfield KM. Vitamins for chronic disease prevention in adults: clinical applications. *JAMA* 2002; 287:3127-3129.

<sup>6</sup> Willett WC. *Eat, Drink and Be Healthy*. Simon & Schuster Source, New York, 2001.