

October 4, 2019

2020-2025 Dietary Guidelines Advisory Committee
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Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Re: Meetings: 2020 Dietary Guidelines Advisory Committee (Docket FNS-2019-001)

Dear Dietary Guidelines Advisory Committee:

The Council for Responsible Nutrition, the leading trade association representing dietary supplement and functional food manufacturers and ingredient suppliers, appreciates the opportunity to provide comments. The Dietary Guidelines for Americans is a critical effort to promote public health through nutrition to support a healthy body weight and help reduce the risk of chronic disease. The key recommendations for Americans to consume healthy dietary patterns replete with fruits, vegetables, whole grains, fat-free or low-fat dairy, and a variety of proteins aim to optimize required macro- and micronutrients while limiting calories. While the emphasis on nutrient-dense foods should help Americans achieve healthful diets, the potential contribution of dietary supplements to healthy dietary patterns should not be ignored, especially in light of data indicating that the general U.S. population, and certain segments, fail to achieve recommended intakes of micronutrients.

Analyses of data from the National Health and Nutrition Examination Survey indicate that thirty-one percent of the U.S. population is at risk for at least one vitamin deficiency¹. Further, research shows that where eating food alone does not supply enough micronutrients, supplementation helps reduce the prevalence of inadequate nutrient intakes and risk of nutrient deficiencies, with frequent supplementation having a larger impact.^{2,3} Simply put, dietary supplements are useful in providing nutrients that otherwise may be consumed in less than recommended amounts. Because dietary supplements generally have few calories, they can help Americans meet nutrient requirements without exceeding caloric needs.

Further, nutrient inadequacies and deficiencies are prevalent among pregnant and/or breastfeeding women. As the requirements for nutrients, including folate, iron, iodine, and zinc, increase during pregnancy, prenatal multivitamins are widely recommended to women before and during pregnancy, and often postpartum for breastfeeding women, to ensure adequate intake of nutrients. Evidence suggests that pregnant women in the U.S. do not meet recommendations for key essential nutrients, a portion are at risk for deficiency, and that dietary supplements reduce the risk of inadequacy and deficiency^{2,4}. As such, dietary recommendations for this life stage should note the usefulness of dietary supplements in helping to meet nutrient requirements.

Similar to previous Dietary Guidelines Advisory Committees, the 2015 Advisory Committee reported data demonstrating that the dietary patterns of the U.S. population were too

¹ Bird JK, Murphy RA, Ciappio ED, McBurney MI. Risk of deficiency in multiple concurrent micronutrients in children and adults in the United States. *Nutrient*. 2017;9(7). doi: 10.3390/nu9070655.

² Blumberg JB, Frei BB, Fulgoni VL III, Weaver CM, Zeisel SH. Impact of frequency of multi-vitamin/multi-mineral supplement intake on nutritional adequacy and nutrient deficiencies in U.S. adults. *Nutrients*. 2017;9(8). doi: 10.3390/nu9080849.

³ Frankenfeld CL, Wallace TC. Multivitamins and nutritional adequacy in middle-aged to older Americans by obesity status. *J Diet Suppl*. 2019;1-14. doi: 10.1080/19390211.2019.1645785.

⁴ Bailey RL, Pac SG, Fulgoni VL 3rd. Estimation of total usual dietary intakes of pregnant women in the United States. *JAMA Netw Open*. 2019;2(6):e195967. doi:10.1001/jamanetworkopen.2019.5967.

energy dense but low in fruits, vegetables, whole grains, and dairy, which contributed to under-consumption of a number of essential nutrients including, vitamins A, C, D, and E and choline, calcium, magnesium, iron, and potassium. In fact, some under-consumed nutrients were designated nutrients of public health concern.

Evidence suggests that supplement users do not misconstrue supplements as a way to rectify a poor diet.^{6,7} Consumers understand that dietary supplements are just one part of a healthy lifestyle, reporting that they use dietary supplements to support “overall health and wellness” and “to fill nutrient gaps.”⁵ In addition, data demonstrate that supplement users are more likely than non-supplement users to engage in health promoting habits, such as eating a healthy diet, incorporating regular physical activity, and refraining from smoking⁶. Therefore, if current data still point to under-consumption of important nutrients by the U.S. population, appropriate supplementation may be warranted to correct these nutrient shortfalls when nutrient adequacy is not met through diet alone.

Thank you again for the opportunity to provide comments.

Sincerely,



Haiyuen Nguyen
Senior Director, Scientific and Regulatory Affairs

⁵ Dickinson A, Blatman J, El-Dash N, Franco JC. Consumer usage and reasons for using dietary supplements: report of a series of surveys. *J Am Coll Nutr.* 2014;33:176-182.

⁶ Dickinson A, MacKay D. Health Habits and other characteristics of dietary supplement users: a review. *Nutr J.* 2014;13:14.