

Comments on the Scientific Report of the 2020 Dietary Guidelines Advisory Committee August 11, 2020

CRN Comment

Good morning! I'm Haiuyen Nguyen, representing the Council for Responsible Nutrition, CRN. First, we commend the 2020 Dietary Guidelines Advisory Committee for its work on the Scientific Report and appreciate the opportunity to comment.

The Report confirms American diets are energy rich and nutrient poor, correlating to increased overweight and obesity, contributing to chronic disease. However, we are hopeful that evidence in the Report will generate guidance to help reverse this concerning trend and promote health of Americans across the lifespan.

CRN supports the Committee's recommendation that the Guidelines recognize special nutrient concerns at each life stage. While we agree that the Guidelines should encourage nutrient-dense and lower-calorie food choices, we also recommend specific guidance on the appropriate use of dietary supplements as a way to meet nutrient needs.

The Committee determined that the U.S. population 1 year and older did not meet recommended intakes of vitamins A, C, D, E, and K, calcium, dietary fiber, potassium, magnesium and choline. The Guidelines should recommend that Americans increase intakes of all of these— but especially vitamin D, calcium, dietary fiber and potassium as their underconsumption has been linked to poor health outcomes.

Vitamin D is a nutrient of public health concern for the entire population from infants to seniors but USDA Food Patterns do not provide recommended amounts of vitamin D because few food sources are available. The Guidelines should emphasize that vitamin D supplementation is

necessary for everyone to meet recommended intakes.

CRN also agrees with the Committee that optimal nutrition before, during, and after pregnancy establishes a path for lifelong health and wellness in infants. Thus, the Guidelines should address nutrient concerns during these critical periods.

The Committee reported that many pregnant women did not meet requirements for key nutrients, but acknowledged that 69 percent took supplements, reducing the prevalence of inadequacy. We recommend that the Guidelines reinforce the Committee's advice that pregnant and lactating women follow a nutrient-dense diet along with guidance from a healthcare practitioner on the appropriate use of dietary supplements to meet needs not likely covered by dietary intake alone, especially iron, iodine, and folic acid.

As USDA and HHS focus on developing dietary guidance to promote health and prevent chronic disease, the Departments should also highlight special nutrient concerns and strategies to mitigate them including appropriate use of dietary supplements. We will submit additional written comments for consideration.

Thank you for your attention.