



Consumer Federation of America

March 27, 2018

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Center for Nutrition Policy and Promotion
3101 Park Center Drive, Suite 1034
Alexandria, VA 22302

Re: Requests for Comments: Dietary Guidelines for Americans, 2020-2025

To whom it may concern:

The Consumer Federation of America (CFA) appreciates the opportunity to comment on the topics and supporting scientific questions to inform the U.S. Departments of Agriculture (USDA) and Health and Human Services (HHS) development of the 2020-2025 Dietary Guidelines for Americans.

CFA is an association of over 250 non-profit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy and education. Member organizations include local, state, and national consumer advocacy groups, senior citizen associations, consumer cooperatives, trade unions and food safety organizations. CFA's Food Policy Institute was created in 1999 and engages in research, education and advocacy on food safety, food and agricultural policy, agricultural biotechnology, and nutrition.

The four criteria set out in the [request for comments](#) make sense, however, some topics and questions that meet the criteria for relevance, importance, potential federal impact, and avoiding duplication do not appear in the notice. In particular, one "topic for which there is new, relevant data and represents an areas of substantial public health concern, uncertainty, and/or knowledge gap" concerns the sustainability of food production. As noted in the Dietary Guidelines Advisory Committee (DGAC) [advisory report](#) submitted in February 2015, "addressing sustainable diets" is important "to have alignment and consistency in dietary guidance that promotes both health and sustainability." Ultimately, policymakers chose not to include sustainability goals in the 2015 guidelines, however, that decision should not curtail consideration of this important topic for the next round of guidelines. Examining the health implications of vegetarian and vegan diets is a step in the right direction, but USDA and HHS should also acknowledge the importance of sustainability to current and future generations' welfare and food security, and offer consumers informed guidance on which foods are more or less sustainable to produce.

Another topic of substantial public health concern is consumption of alcoholic beverages. We commend USDA and HHS for proposing to study alcohol's impact on nursing mothers.

However, the next round of dietary guidelines should also incorporate the latest research on alcohol consumption and its impacts on adults more generally. According to [recent research](#), increased alcohol abuse has significantly contributed to a *reduction* in life expectancy for large segments of the American population. In our comments on the 2015 Dietary Guidelines, CFA supported retaining the current recommendation of moderate consumption (*i.e.*, that those who choose to drink should do so in moderation) and the current definition of an alcoholic beverage, *i.e.*, a “standard drink.” However, as we noted in our comments, the federal government must do a better job of ensuring that consumers have the information they need to apply the guidelines.

In particular, the public health authorities have an obligation to acknowledge the deficient labeling on alcoholic beverages. In 2003, CFA, National Consumers League, and many other organizations petitioned the Alcohol and Tobacco Tax and Trade Bureau (TTB) to require Alcohol Facts labeling on alcoholic beverage containers. As indicated in the petition, the relevant alcohol facts would include information about alcohol per serving, servings per container, calories, carbohydrates, percent alcohol by volume, and the definition of a standard drink. In 2013, TTB issued a ruling permitting alcohol producers to voluntarily put Alcohol Facts labels on their products, pending completion of a final rule.¹ USDA and HHS should use the Dietary Guidelines process to establish that information about alcohol content should be required on all alcoholic beverage containers. This would help consumers moderate their drinking as well as provide essential information about calorie content.

Finally, we encourage USDA and HHS to expansively interpret the proposed topics to include consideration of relevant research on how added sugars, sodium, excessive meat consumption, inadequate water consumption, caffeine, and foodborne disease vectors affect public health. In particular, the proposed topics include “Dietary patterns to promote health and normal growth and meet nutrient needs” for the “children and adolescents,” “adults,” and “older adults” groups. The corresponding proposed questions for this topic refers to “the relationship between specific dietary patterns,” including “Dietary Guidelines-related” ones, with various diet-related diseases. Thus, where the 2015 Dietary Guidelines include a dietary recommendation, this process should consider the impact of that recommendation, and related recommendations that might go further, on public health.

Thank you your consideration of these comments.

Sincerely,

Thomas Gremillion
Director, Food Policy Institute
Consumer Federation of America

¹ Alcohol and Tobacco Tax and Trade Bureau Ruling 2013-2, “Voluntary Nutrient Content Statements in the Labeling and Advertising of Wines, Distilled Spirits, and Malt Beverages,” May 28, 2103 via <http://www.ttb.gov/rulings/2013-2.pdf>.