

April 19, 2010

The Honorable Tom Vilsack  
Secretary  
United States Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20250

The Honorable Kathleen Sebelius  
Secretary  
Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Secretary Vilsack and Secretary Sebelius:

The undersigned organizations are writing you to urge the use of sound science and to increase transparency as the Dietary Guidelines Advisory Committee (DGAC) considers updates to the Dietary Guidelines for Americans (DGA) due for publication this year. In order to be effective and have a meaningful impact on public health, the Dietary Guidelines must be easily understood, easily implemented and based upon a preponderance of sound scientific principles. We believe it is important to stress energy balance on issues related to obesity and weight control, recognizing that physical activity is as important as dietary intake.

As stated by the Departments of Health and Human Services and Agriculture, "...the 2005 Dietary Guidelines provides information and advice for choosing a nutritious diet, maintaining a healthy weight, [and] achieving adequate exercise..." The DGA are an important tool for consumers as they make lifestyle choices. In addition, the National Institutes of Health has published statements indicating that obesity is a condition of multiple factors, not solely diet. Science supports focusing on the total diet, physical activity, and the essential role that energy balance plays in achieving and maintaining overall health. Within the context of these statements, we do not believe that any one food or beverage should be branded as either "good" or "bad." This view is reinforced in an article published last year in the *New England Journal of Medicine* which concludes that calories are calories, regardless of source<sup>1</sup>.

While we were pleased to participate in the early public forums and have participated in the subsequent webinars, we believe that public release of the scientific questions and evidence reviews, as was done in a timely manner prior to the 2005 DGA publication, would have provided the public greater transparency and opportunity to fully

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<sup>1</sup> Sacks FM, Bray GA, Carey VJ, Smith SR, Ryan DH, Anton SD, McManus K, Champagne CM, Bishop LM, Laranjo N, Leboff MS, Rood JC, de Jonge L, Greenway FL, Loria CM, Obarzanek E and Williamson DA. "Comparison of Weight-Loss Diets with Different Compositions of Fat, Protein, and Carbohydrates." *New England Journal of Medicine* 360.9 (2009): 859-873

engage throughout the process. We feel strongly that as much information as is allowed under Federal Advisory Committee Act (FACA) rules should be open and available for public review and input during the DGAC process with electronic access wherever possible.

We would be happy to discuss these issues with you or your staff at your convenience and look forward to working with your Departments on this effort.

Sincerely,

American Bakers Association  
American Beverage Association  
American Frozen Food Institute  
American Sugar Alliance  
Corn Refiners Association  
International Dairy Foods Association  
Juice Products Association  
National Confectioners Association  
National Corn Growers Association  
National Pasta Association  
Snack Food Association  
The Sugar Association