July 15, 2010

Carole Davis
Co-Executive Secretary and Designated Federal Officer of the Dietary Guidelines Advisory Committee
Center for Nutrition Policy and Promotion
U.S. Department of Agriculture
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear Ms. Davis,

The National Cattlemen’s Beef Association (NCBA) appreciates the opportunity to provide these comments related to the Report of the Dietary Guidelines Advisory Committee (DGAC) on the Dietary Guidelines for Americans (DGA), 2010. NCBA recognizes and supports the agency’s efforts to gain additional input from the public regarding this advisory report and we respectfully request your careful consideration of these science-based comments as the agencies work to develop the Dietary Guidelines for Americans later this year.

NCBA is the nation’s oldest and largest national trade association for cattlemen and represents over 140,000 cattle producers through direct membership and our state affiliates. NCBA is producer-directed and consumer-focused, and our top priority is to produce the safest, most nutritious and affordable beef products in the world. This has been consistent throughout our industry’s history and in our long-term efforts to continually improve our knowledge and ability for beef products to meet consumer preferences.

Cattle producers have a long history of supporting nutrition research, education and communication programs to help consumers choose beef as part of a healthy and balanced diet. Our Statement of Principles Regarding Nutrition and Health, in place since 1984 and updated every five years, outline our commitment to providing a wholesome, nutritious food and to communicating accurate information about beef’s nutritional qualities and the role of beef in a healthful diet. We believe the overwhelming scientific evidence shows that dietary balance, variety and moderation coupled with appropriate physical activity provides the foundation for a healthful life and we have long supported the recommendations of the Dietary Guidelines for Americans and the United States Department of Agriculture food guide in that regard.

The industry has also proactively supported transparent nutrition information, such as meat nutrition labeling at retail, because beef producers continue to believe that it is the consumers’ right to know and the industry’s responsibility to provide, accurate nutrition information about the product. NCBA shares the concern that our nation is facing an obesity crisis while at the same time; many Americans are also overfed and undernourished. We support the need to provide the public with consumer-driven, science-based nutrition guidance. As such, we appreciate the work of the Committee to develop their Report and we commend the use of the Nutrition Evidence Library (NEL) to systematically evaluate the available science.
The Committee report concludes that good health and vitality is achievable through a total diet approach that is energy balanced, nutrient dense, and very low in added sugars, solid fats, refined grains and sodium. However, in a departure from the evidence, the Committee translates these conclusions into recommendations to “shift food intake patterns to a more plant-based diet that emphasizes vegetables, cooked dry beans and peas, fruits, whole grains, nuts and seeds” and consume “only moderate amounts of lean meat, poultry and eggs.”

A dietary recommendation to shift food intake patterns to a more plant based diet fails to recognize the fact that Americans’ diets are already plant-based and that the current practice of choosing poor-quality plant foods is likely a contributing factor to Americans being overweight. Based on the modeling of the Typical Intake Pattern in the USDA Food Pattern Analysis in Appendix E-3 of the Report indicates Americans are already consuming over 70 percent of their calories from plant foods.

Furthermore, the Report notes “overconsumption of refined grains is a major source of extra calories in the diet” and that “Americans may choose animal products as part of their diet based on the body of evidence showing a general lack of relationship between animal protein consumption and selected health outcomes.” Additional contradictions to the recommendation to “shift to a more plant-based diet” are indicated in committee’s statements below:

- “Animal sources of protein, including meat, poultry, seafood, milk and eggs, are the highest quality proteins.” (Executive Summary)
- “When protein needs are high, such as during growth and development, consumption of animal products will provide greater quantity and quality of protein than plant products.” (D-4)
- “Individuals who restrict their diet to plant foods may be at risk of not getting adequate amounts of certain indispensable amino acids because the concentration of lysine, sulfur amino acids, and threonine are sometimes lower in plant than in animal food proteins.” (D-4)
- “Animal proteins tend to have higher protein quality based on their complete amino acid profile relative to human requirements and digestibility.” (Appendix E-2)

On the basis of these findings, the scientific evidence simply does not support a recommendation to shift to a more plant-based diet. Blanket advice to consume a more plant-based diet will misguide consumers and could undermine a major overarching goal cited in the report: To reduce the incidence and prevalence of overweight and obesity of the U.S. population by reducing overall caloric intake and increasing physical activity. This “plant-based” recommendation implies a philosophical approach and limits the flexibility to incorporate the variety of foods necessary for individuals to create a healthy dietary pattern consistent with their preferences and cultural norms.

Of particular concern, is the Committee’s use of arbitrary and inconsistent descriptions of what constitutes a “plant-based” diet. Dietary patterns, as defined in the glossary definitions in Appendix E-2, are based on the types and amounts of foods and beverages consumed. Later, in the Food Modeling Analysis, in Appendix E-3, only plant-based diets are singled out to be defined on the basis of nutrients, specifically as diets that provide 50% of all protein from plant foods. The definition is open to further interpretation when, later in the Food Modeling Analysis section, plant-based, lacto-ovo vegetarian and vegan dietary patterns are collectively referred to as “vegetarian dietary patterns.” For example, Wikipedia, the most popular online encyclopedia, written and edited by consumers, states that a plant-based diet may refer to veganism, vegetarianism, fruitarianism or a macrobiotic diet.
Population-based dietary guidance should recognize a variety of healthy dietary patterns, including those which provide a majority of protein as animal protein from high quality protein sources such as lean beef and are also rich in fruits, vegetables, whole grains and low-fat or fat free dairy. These patterns are also nutritionally adequate, calorie-balanced, and associated with positive health outcomes.

NCBA supports the recommendation of choosing lean meats over higher fat options and we support the Committee’s recommendation to maintain meat intake amounts in the USDA Food Patterns at the levels recommended in the 2005 Dietary Guidelines for Americans. However, the recommended translation to “consume only moderate amounts of lean meat, poultry and eggs”, implies that American’s need to limit these nutrient-dense, high-quality protein sources. As important as it is to advise Americans to eat more fruits and vegetables, whole grains rather than refined, low and nonfat milk, they also need specific advice on eating lean meats most often, in moderate portions. The Dietary Guidelines should provide consumers with specific guidance about choosing beef cuts from the loin or round and >90% lean ground beef. Alternatively, a list of the 29 lean beef cuts could be included. In addition, based on this Committee’s own evidenced based findings, there is no need to suggest or imply that Americans further limit their intake of lean meat with a recommendation to “choose only moderate amounts of lean meat”.

According to the Report, the Meat and Beans group is the only food group consumed in recommended amounts. The DGAC Report also highlighted that many women and adolescent girls are under-consum ing from this nutrient-rich food group, placing them at significant risk for nutritional deficiencies such as anemia. Based on current consumption data using NHANES and WWEIA data, Americans on an average 2000 calorie-a-day diet are consuming 5.3 ounces of meat or meat equivalents. (Cook and Friday, 2005) - Additionally, contrary to the common misperception, current beef consumption is well within recommendations at about 1.7 ounces per day (Zanovec et al., in press).

The Committee’s use of language that implies a need to reduce red meat intake is also illustrated in the committee definition of the Dietary Approaches to Stop Hypertension (DASH) diet in the glossary. The Committee highlights the DASH diet as an example of a healthy dietary pattern and defines in the Report Glossary DASH as “a dietary pattern that emphasized potassium-rich vegetables and fruits and low-fat dairy products; includes whole grains, poultry, fish and nuts; and is reduced in red meat, sweets and sugar-containing beverages. Yet, the current DASH eating plan promoted by the 2005 U.S. Dietary Guidelines and the National Heart, Lung, Blood Institute (NHLBI) as a healthful dietary pattern, recommends the consumption of 6 ounces (170 g) per day of lean meats, poultry, and fish, with no specific restrictions on red meat or beef. Specifically, consumer guidance found at www.dashdiet.org states “The DASH diet eating plan is a diet rich in fruits, vegetables, low-fat or nonfat dairy. It also includes grains, especially whole grains; lean meats, fish and poultry; nuts and beans.” The definition of DASH in section B-2 and in the Report Glossary should be revised to be consistent with the consumer-directed DASH guidance offered by the National Heart, Lung, Blood Institute (NHLBI) website and consumer education materials.

Beef also has a misunderstood fat profile. Approximately half of beef’s fatty acid are monounsaturated and one-third of beef’s saturated fatty acid profile is stearic acid. The Committee recognized stearic acid neutrality on cholesterol levels noting, “since stearic acid is not known to raise LDL cholesterol, the DGAC is recommending that stearic acid not be categorized with known —cholesterol-raising fats, which include C12, C14, C16 SFA and trans fatty acids.” NCBA supports the DGAC’s recommendation not to include stearic acid in “cholesterol-raising” saturated fatty acids and any guidance related to a reduction in saturated fatty acid content should clearly acknowledge the cholesterol neutral effects of stearic acid.
Beef makes significant contributions to the nutritional quality of the American diet relative to the calories it provides (Hiza et al 2007). On average, a lean cut of beef provides only 154 calories yet it supplies a good-to-excellent source of 10 essential nutrients, including many that are often limited in the typical diet like choline and iron. The DGAC clearly acknowledges that lean beef meets the definition for a nutrient-dense food, and nutrient density is recognized in the Report as an important component of the American diet. Americans should be encouraged to include nutrient-dense foods like lean beef as part of a healthy and balanced diet. Lean beef is now widely available and popular with consumers. Using the definition of lean set by the USDA for labeling purposes, there are at least 29 cuts of beef that are lean (USDA-NDL SR 22, 2010) and sixty-three percent of beef cuts sold at retail meet that definition (Freshlook Marketing Data, 2010).

Clearly in order for the Dietary Guidelines to be successful, consumers must follow them. Americans need to understand how to implement the guidelines in their daily diets. They need simple and specific advice on how to eat from each food group. NCBA believes the best way to reach consumer is to focus on a small number of concrete, positive and readily actionable messages. The messaging should focus on the unifying concept of nutrient density, a theme that is prominent in the Report. NCBA’s members support the basic definition of nutrient density in the 2005 Dietary Guidelines – “foods that provide substantial amounts of vitamins and minerals (micronutrients) and relatively few calories.”

In conclusion, the evidence clearly supports the value of high quality animal proteins such as lean beef in a healthy diet that is also balanced with fruits, vegetables, whole grains and low and non-fat dairy. The overwhelming body of scientific evidence outlined above and in the DGAC report does not support a recommendation that Americans shift to a more plant-based diet, nor does it support language that implies American’s further limit their intake of lean meat.

Should you have any questions or concerns please contact Kristina Harris Butts, NCBA’s Director of Legislative Affairs at 202-879-9106 or kbutts@beef.org.

Sincerely,

Steve Foglesong
President
References:

Freshlook Marketing Group, the leading U.S, source of grocery scanner data for meat and produce purchasing. 52 weeks ending 3/26/10.

