



May 27, 2014

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

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue, SW Room 200-A  
Washington, DC 20250

Dear Secretary Sebelius and Secretary Vilsack:

We, the undersigned, understand that the stated mission of the Dietary Guidelines Advisory Committee is to provide “nutritional and dietary information and guidelines for the general public...based on the preponderance of *scientific and medical knowledge* currently available” (emphasis added).

However, we are concerned about several developments which, if unaltered, may lead to a new set of Guidelines that: 1) are not grounded in the best available science, 2) reflect ideological or political views that are out-of-step with the majority of Americans, 3) stray well beyond the appropriate dietary focus of the Committee, 4) neglect the special dietary traditions of several American ethnic groups, and 5) will result in dietary guidance that increases food costs and accessibility, and is unlikely to be adopted by most Americans.

Among our most acute concerns is the “mission creep” of the Committee, which has expanded to include non-dietary factors such as “carbon footprints,” “climate change,” “urban agriculture,” and “green cleaning and pest control practices.” This likely reflects the composition of the Committee, which is nearly all epidemiologists from elite academic institutions with no direct experience in the practical realities of how food is produced and what average Americans may choose to eat. We need only consider the strongly negative reaction to recent changes to the school lunch rules to understand what is at risk if this Committee attempts to dictate over-reaching changes to the American diet.

To address these problems, we call for the adoption of the following reforms. They are offered with a genuine interest in refocusing the work of the Committee on a set of revised guidelines that are truly science-based and have a high likelihood of actually being adopted.

1. **Mission focused:** Ensure that the Committee stays focused on health and nutrition issues and does not use the Dietary Guidelines process to advance personal ideology on issues such as the environment, animal rights, immigration, sustainability and other non-dietary matters.
2. **Transparency:** Require greater transparency with regard to the science the Committee is using to develop its recommendations, given the Committee’s current practice of failing to disclose the scientific database it is working from and which holds subcommittee meetings behind closed doors with no public input. A first step would be to open its subcommittee meetings to the public and broadcast them online. The Committee should also be directed to use the full breadth of available research, not data selectively

mined to prove their preconceived points. That research should be made public from day one, not kept under lock and key until the Committee has submitted their final report.

3. **Professional diversity:** Expand and diversify the Committee to reflect a broader set of expert perspectives and to more fully include the input of members of the food science community who have actual experience in producing and providing food.
4. **Adoptability:** Direct the Committee to develop guidelines that are within the budget of lower- and middle-income consumers, are respectful of the special dietary needs of ethnic groups, and have a realistic chance of being widely adopted given the constraints of time, cost and convenience of average Americans.
5. **Impact:** Establish a credible process to determine if and how the new guidelines will affect the food-producing community, including farmers, ranchers, processors and food retailers, and whether there is currently the infrastructure and capacity to produce and gain widespread adoption of the Committee’s dietary recommendations. Given the Committee’s apparent embrace of “organics” and other foods that are not available to all Americans, it is essential that its members think through the feasibility of achieving its objectives on a national level.

In closing, we would like to reemphasize that the Committee’s purpose—to periodically provide science-based nutritional guidance to the American public—is a worthy goal. However, problems can arise and cynicism can grow when this extremely important task is driven by a small group of like-minded academics, who are insulated from the day-to-day realities of food production and have no experience feeding the vastly diverse population of Americans.

Please help to ensure the 2015 Dietary Guidelines are developed with a spirit of full transparency, are based on the all of the best science available, and serve the best interests of all Americans.

Sincerely,

Julie Gunlock  
Director, COA Program  
Independent Women’s Forum

James L. Martin  
Chairman  
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