

Council for Responsible Nutrition
Oral Comments to the Dietary Guidelines Advisory Committee – Meeting 2 – July 11, 2019
Delivered by Haiuyen Nguyen
<https://www.youtube.com/watch?v=yxIRFAOPzNA>

Good afternoon. I'm Haiuyen Nguyen here on behalf of the Council for Responsible Nutrition. First, we commend the Committee and the USDA and HHS staff for implementing what has become the most transparent Dietary Guidelines process yet. With limited time and resources, you have done a tremendous job.

The Dietary Guidelines for Americans is a critical effort to improve and promote public health through nutrition. While the focus is on healthy dietary patterns that include a wide array of foods, it is also prudent to consider the potential contribution dietary supplements can make to these healthy dietary patterns—in targeted populations and more broadly.

Regarding birth to 24 months and pregnancy and lactation life stages, we recommend the Advisory Committee consider the variety of infant feeding options, taking into account practicality and flexibility with the goal of supporting healthy mothers and healthy babies.

Prenatal multivitamins are widely recommended to women before and during pregnancy, and often postpartum for breastfeeding women, to ensure adequate intake of nutrients. A recent study suggests that pregnant women in the U.S. do not meet recommendations for key essential nutrients, and that dietary supplements reduce the risk of inadequacy¹. Thus, dietary patterns recommended for this life stage should highlight opportunities for supplementation.

¹ Bailey RL, Pac SG, Fulgoni VL 3rd. Estimation of total usual dietary intakes of pregnant women in the United States. *JAMA Netw Open*. 2019;2(6):e195967. doi:10.1001/jamanetworkopen.2019.5967.

More broadly, in their scientific reports, previous Advisory Committees have consistently observed data demonstrating that the majority of the U.S. population do not consume enough vegetables, fruits, whole grains, and dairy to meet nutrient needs and thus have nutrient shortfalls. In fact, some shortfalls have significant impact and present public health concern; these include vitamin D, calcium, dietary fiber, and potassium. We recommend the Advisory Committee consider novel recommendations, including supplementation, to help Americans meet nutrient requirements without exceeding energy needs.

Healthy dietary patterns can consist of a variety of nutrient dense foods as well as nutrient dense supplements. Consumers understand that dietary supplements are just one part of a healthy lifestyle, reporting that they use dietary supplements to support “overall health and wellness” and “to fill nutrient gaps.”² In addition, data demonstrate that supplement users are more likely than non-supplement users to engage in health promoting habits, such as eating a healthy diet and incorporating regular physical activity³. Therefore, if current data still point to under-consumption of important nutrients by the U.S. population, appropriate supplementation may be warranted to correct these nutrient shortfalls when nutrient adequacy is not met through diet alone.

Thank you for the opportunity to provide comments. We are happy to provide further information or clarification if needed.

² Dickinson A, Blatman J, El-Dash N, Franco JC. Consumer usage and reasons for using dietary supplements: report of a series of surveys. *J Am Coll Nutr.* 2014;33:176-182.

³ Dickinson A, MacKay D. Health Habits and other characteristics of dietary supplement users: a review. *Nutr J.* 2014;13:14.