



The American Cancer Society and the American Cancer Society Cancer Action Network

Comments to the National Academies, Health and Medicine Division

on the Review of the Process to Update the *Dietary Guidelines for Americans*

October 17, 2016

On behalf of the American Cancer Society (the Society) and the American Cancer Society Cancer Action Network (ACS CAN), thank you for the opportunity to provide comments today. The Society is a nationwide, community-based voluntary health organization dedicated to eliminating cancer as a major health problem. ACS CAN is the nonprofit, nonpartisan advocacy affiliate of the Society. We support the development and implementation of evidence-based guidelines to improve diet, increase physical activity, and manage weight in order to prevent the one in five cancer cases related to these factors.

Advisory Committee Selection Process

Overall, we believe that the existing process for selecting the Dietary Guidelines Advisory Committee (DGAC) is appropriate to reduce conflicts of interest and ensure that the Committee's recommendations are an unbiased reflection of the current scientific evidence. We recommend modest refinements, including further limiting conflict of interest waivers and requiring that the reason for the waiver and the specific conflicts be publicly disclosed when one is granted. Anyone with a financial interest in the recommendations of the DGAC or the Dietary Guidelines should not be allowed to serve.

It is important that committee members possess a range of expertise but not necessarily a "range of viewpoints". The DGAC's conclusions and recommendations should be based on a systematic examination of the existing science, and not the Committee members' opinions.

Methods to Review the Scientific Evidence

We also believe that the Committee's methods to review the scientific evidence are appropriate, including the use of dietary analyses and systematic reviews, which are standard practice in the medical field. The Committee should rely even more heavily on existing high-quality reviews and reports, instead of recreating them, and focus its reviews on supplemental and newer research. The Committee should examine high-quality studies from a range of disciplines and base its recommendations on the totality of the evidence, and regardless of the viewpoints of the study authors.

How the Dietary Guidelines Can Prevent Chronic Disease

While the *Dietary Guidelines* are already intended to help Americans eat a healthy diet to reduce their risk of chronic disease, its recommendations should be more focused on ways to prevent the leading diet-related chronic diseases, including cancer, and more transparency is needed in the process to

develop the *Dietary Guidelines* policy document. For example, while the 2015 DGAC examined the relationship between diet and the most common types of cancer, some of their recommendations ultimately were not included in the *Dietary Guidelines*. When the federal agencies do not include a specific science-based recommendation from the DGAC in the *Dietary Guidelines*, they should be required to explain why the recommendation is omitted or revised.

The *Dietary Guidelines* could better help Americans make changes in their diets by recommending specific individual behavior changes and clear policy, system, and environmental change recommendations that help people make healthier choices. Increased efforts are also needed by all stakeholders to put these recommendations in place across America.

Conclusion

Thank you for the opportunity to provide comments at today's meeting. We look forward to continuing to provide input on this important topic as the Committee's work moves forward.