



Comments from the American Cancer Society and American Cancer Society Cancer Action Network

to the Health and Medicine Division of the National Academies of Sciences, Engineering and Medicine

on

the Dietary Guidelines Advisory Committee Selection Process

October 3, 2016

The American Cancer Society (the Society) and the American Cancer Society Cancer Action Network (ACS CAN) appreciate the opportunity to comment on the Dietary Guidelines Advisory Committee selection process. 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.

Given that one in five cancer cases are caused by poor diet, physical inactivity, and excess weight, we support the development, implementation, and dissemination of evidence-based guidelines to improve diet, manage weight and reduce diet-related chronic diseases, including cancer.

Overall, the Society and ACS CAN support the existing process for selecting the Dietary Guidelines Advisory Committee (DGAC). We believe it 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 the following modest refinements to strengthen what is essentially a solid selection process.

Minimizing Conflicts of Interest

We believe that the existing process for selecting the DGAC is sufficient to reduce conflicts of interest. The 2015 DGAC charter designated Committee members as "special government employees", meaning that unless a waiver was granted, Committee members must be free of personal and professional financial conflicts of interest. This process is consistent with the selection process for other federal advisory committees, and should remain in place for future DGACs. In addition, waivers should only be granted if the Secretaries of the U.S. Departments of Agriculture and Health and Human Services determine there are no other individuals with the necessary experience and expertise without conflicts of interest who are willing to serve on the committee. If a waiver is granted, the agencies should be required to publicly disclose the reason for the waiver, including the specific conflicts of interest that exist.

We believe it is appropriate to exclude from DGAC membership food and beverage industry representatives, including those who advise the industry and/or have food and beverage industry clients, and any other individuals with a financial interest in the recommendations of the DGAC or the *Dietary Guidelines for Americans*. Industry groups – like other members of the public – have an opportunity to share their perspectives with the Committee and the federal government through the public comment process. Allowing individuals with a financial interest in the DGAC or the Dietary Guidelines to participate in the development of the DGAC report or the Dietary Guidelines – beyond those comment opportunities broadly open to the public - would create an unnecessary conflict of interest.

Including the Appropriate Expertise

We believe that the DGAC members should possess a range of expertise. As the 2015 DGAC charter mandated, Committee members should include “individuals with current scientific knowledge in the field of human nutrition and chronic disease”, including expertise in a number of specific specialty areas. This does not mean that members of the DGAC need to contain a “range of viewpoints”, or perspectives on an issue. The DGAC’s conclusions and recommendations should be based on a systematic examination of the existing science, and not the Committee members’ opinions. Therefore, it is important that the Committee members continue to represent a range of expertise but not necessarily a “range of viewpoints”. All DGAC members should possess expertise in human nutrition and chronic disease across the lifespan. Across its membership, future DGACs should contain expertise in the following specialty areas, which were required of the 2015 DGAC: cancer, cardiovascular disease, type 2 diabetes, overweight and obesity, energy balance (which includes physical activity), nutrient bioavailability, nutrient biochemistry and physiology, and food processing science, safety, and technology. The committee should comprise a range of disciplines including general medicine, clinical research, epidemiology, public health, and nutrition-related systematic review methodology. In addition, future DGACs should include individuals with expertise in nutrition education and behavior change; policy, environmental, and systems changes; and implementation and dissemination of evidence-based strategies. Racial/ethnic, age, gender, and geographical diversity of committee members should also be sought. This is not an exhaustive list of all of the types of experience and expertise that may be needed to develop a comprehensive, evidence-based DGAC report. The DGAC should continue to engage outside experts as consultants or public meeting presenters on specific topics, as needed, to fill gaps in knowledge among committee members.

Conclusion

We appreciate the opportunity to provide comments in response to this call for public input. We look forward to continuing to provide input as your committee continues its review of the process to update the *Dietary Guidelines for Americans*.