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January 23, 2009

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

Announcement of the Second Meeting of the 2010 Dietary Guidelines Advisory Committee and  
Solicitation of Written Comments Federal Register, January 23, 2009 (Volume 74, Number 5)

Dear Ms. Davis:

I appreciate the opportunity to respond to the Federal Register Notice for written comments to the Dietary Guidelines Advisory Committee prior to its second meeting.

Today in the United States, we are at a crossroads when it comes to nutrition education. Obesity is at an all-time high, and both adults and children are missing out on vital nutrients because they are not choosing foods that provide nutrients important for their health. For more than three decades now, advice has centered around an “avoidance strategy,” focusing on which nutrients and foods to avoid. But the nutrient avoidance approach hasn’t worked – people are still overweight, yet undernourished.

It’s time to consider a new approach to help Americans achieve better health. Consumer research provides a way to explore approaches that consumers will listen to, understand and act upon when it comes to building healthier diets.

I would like to share the results of two surveys—one of consumers and one of health professionals—that strongly indicate they are receptive to a positive, total diet approach that emphasizes nutrient-rich foods. The Nutrient Rich Foods approach, which takes into consideration the complete nutrient package a food offers – both essential nutrients we need more of *and* those we should limit, rather than focusing just on nutrients to limit, would enable the American population to build more healthful diets.

This research was funded by the Nutrient Rich Foods Coalition (NRFC), a public/private partnership dedicated to helping people build more healthful diets by showing them how to get more nutrition from their calories. A consumer survey of 1,019 adults from all regions of the U.S. was conducted to gauge consumers’ perceptions of the nutrition messages they receive.<sup>1</sup> The results showed that:

- 54% of those surveyed are overwhelmed by the information and advice they receive on what to eat and what to avoid.
- 61% are interested in learning about the beneficial nutrients found in foods and beverages, not just the amount of fat, sugar and salt a food contains.
- 78% agreed that they would like a simple, practical tool that would help them build a healthful diet based on getting the most nutrients from the foods they choose.

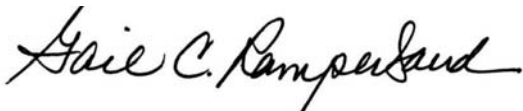
In December, the NRFC also commissioned an online survey of 250 registered dietitians and 250 pediatricians to evaluate health professionals' attitudes regarding nutrient avoidance and the nutrient-rich foods approach.<sup>2</sup> Among the findings:

- Most registered dietitians (98%) and pediatricians (96%) believe nutrition advice is most helpful when it helps consumers understand the total nutrient package (both positive and negative nutrients) foods and beverages provide.
- The majority of registered dietitians (97%) and pediatricians (96%) agree that in order to fight the obesity crisis, Americans need to think positively about what foods to eat instead of negatively about what foods not to eat.
- Health professionals agree that it's important for people to learn how to build healthy diets by selecting nutrient-rich foods first from all food groups (99% registered dietitians and 96% pediatricians).
- More than half of registered dietitians (62%) believe that a focus on avoiding foods with so-called "negative" nutrients (fat, sugar, salt) has contributed to the development of an overweight and undernourished population.

I believe that these findings provide compelling evidence that consumers and health professionals alike are ready for positive nutrition messages that emphasize nutrient-rich foods, as was recommended by the 2005 Dietary Guidelines Advisory Committee. A diet built on nutrient-rich foods can provide a solid foundation for better health. Dietary guidance that incorporates the nutrient-rich message will help Americans choose more healthful diets, which may translate into a decreased risk for chronic disease.

I appreciate the opportunity to provide comments to the Dietary Guidelines Advisory Committee.

Respectfully submitted,



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<sup>1</sup> This study was conducted by Ipsos Public Affairs, a global survey-based market research company, on behalf of the NRFC on September 9-12, 2008. Margin of error is plus or minus 3.1%. Participants surveyed: 1,019 adults on-line from all regions of the U.S. Survey respondents were 48% male and 52% female, and the majority were between ages 25 and 64.

<sup>2</sup> The study was conducted online with a national sample of 500 health professionals including 250 registered dietitians and 250 pediatricians between December 16 -23, 2008. Data for this survey were collected by Harris Interactive Service Bureau ("HISB") on behalf of the NRFC. HISB was responsible for the data collected and NRFC was responsible for the survey design, question development, analysis and reporting. The margin of error on a sample of 500/250 is plus or minus 4.4%/6.2%, respectively.