



NATIONAL POTATO COUNCIL

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March 30, 2018

Docket No. FNS-2018-0005: Dietary Guidelines for Americans: Request for Comments on Topics and Questions

To Whom It May Concern:

Thank you for the opportunity to comment on the Dietary Guidelines for Americans: Request for Comments on Topics and Questions. The National Potato Council (NPC) provides a unified voice for U.S. potato growers and represents the interests of the U.S. potato industry on national issues. Potatoes are an important part of the American diet at every life stage. They are high in fiber and potassium, two nutrients flagged as nutrients of concern due to under consumption in the past edition of the Dietary Guidelines for Americans (DGA), as well as host to a number of other nutrients. In addition, they are a food enjoyed by the American public.

Supporting Inclusion of the Dietary Patterns Questions

We applaud the emphasis, in the topics and research questions, on dietary patterns rather than individual foods, as is consistent with the 2015-2020 Dietary Guidelines for Americans (DGA). However, we understand that “dietary patterns” lacks a common definition, as do the dietary patterns themselves, and therefore important literature may not be found using a standard search criteria. In fact, per the 2015 Dietary Guidelines Advisory Committee (DGAC), the concept of dietary patterns still needs to be better understood. Moreover, “researchers are characterizing dietary patterns very differently and yet sometimes use similar nomenclatures. This makes it difficult to compare results across studies.”¹ Given this lack of firm definition, there are a wide number of other “dietary patterns” other than the patterns mentioned by the Agencies in their proposed topics announcement (Dietary Guidelines-related, Mediterranean-style, Dietary Approaches to Stop Hypertension (DASH), vegetarian/vegan, and low-carbohydrate diets). It will be important that the Agencies take a holistic approach to their review of all dietary patterns to ensure that the Guidelines are providing the consumers with not only the most scientifically rigorous guidance, but also guidance for enhancing the American diet that is implementable.

Therefore, it would be extremely relevant, important, and impactful to update the wording of these questions to broaden them to be inclusive of the many potential “dietary patterns” that exist in the literature. We recommend consideration of edits to the dietary pattern question that is found in similar form throughout 4 of the 5 life stages (children and adolescents, adults, pregnancy and lactation, older adults) as follows:



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- What is the relationship between *each* of the specific dietary patterns (Dietary Guidelines-related, Mediterranean-style, Dietary Approaches to Stop Hypertension (DASH), vegetarian/vegan, and low-carbohydrate diets), *along with a variety of additional dietary patterns achieved by a macronutrient mix, such as within the guidance of the Acceptable Macronutrient Distribution Range (AMDR) and other science-based approaches to flexibly meeting macronutrient needs for health, consumed ... ?*

We implore the Agencies to ensure that the reviews of the literature on dietary patterns are done in an holistic manner. For example, a number of current studies examining dietary patterns and health outcomes exclude potatoes from the vegetable group based upon characterization of potatoes as “non-vegetables” when looking at health effects in epidemiological data. Yet we are aware that plenty of data exists showing potatoes are a great component of a healthy diet and there are a number studies that have shown an association between increased vegetable consumption, including potatoes, and improved health outcomes (or reduced incidence of disease). All data will need to be assessed in order to finalize a DGA document that is as scientifically sound as possible.

Supporting Inclusion of the USDA Food Patterns Questions

Additionally, we are supportive of the topics/questions regarding potential need to consider changes to the USDA Food Patterns in the children and adolescents, adults, pregnancy and lactation, and older adults life stages. For example, white potatoes contribute useful quantities of potassium and fiber to Americans’ diets.ⁱⁱ Additionally, it has been found that the consumption of white potatoes improves potassium intake for both women and children (a nutrient that continues to be a nutrient of under-consumption for all WIC demographics except formula fed (FF) infants 0-6 months.)ⁱⁱ Yet, federal feeding programs have been quick to remove eligibility for white potatoes in the past, due to their widely consumed nature. As a reminder, consumption of starchy vegetables has not met DGA recommendations for all age / gender categories in the past two editions of the guidelines (2010 and 2015). While the use of food pattern modeling would allow for answering questions, such as this, regarding dietary pattern adequacy, we seek more clarity on the actual food pattern modeling process. There seems to be a lack of common understanding regarding this process given it is highly technical in nature with a heavy reliance on statistical methods. Transparency during this modeling process will be of the utmost importance. We ask that as the Agencies, and yet to be convened DGAC, take on this task they embrace the call of the National Academies of Science, Engineering, and Medicineⁱⁱⁱ and enhance transparency into how this food pattern modeling is done. We applaud the Agencies focus on transparency thus far and look forward to working with the Agencies as the DGA process, in its entirety, continues.

New Topic Request: Cognitive Health / Development

As discussed above, NPC is very supportive of the dietary patterns approach. We would like to invite the Agencies to consider adding cognitive development to the list of health outcomes that these questions address. For example, including our notes from above regarding dietary patterns, the new question would read:

For children and adolescents:



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- What is the relationship between *each* of the specific dietary patterns (Dietary Guidelines-related, Mediterranean-style, Dietary Approaches to Stop Hypertension (DASH), vegetarian/vegan, and low-carbohydrate diets), *along with a variety of additional dietary patterns achieved by a macronutrient mix, such as within the guidance of the Acceptable Macronutrient Distribution Range (AMDR) and other science-based approaches to flexibly meeting macronutrient needs for health*, consumed during childhood and adolescence and 1) growth, size, and body composition; and 2) bone health; and 3) cognitive development?

We believe that including cognitive development as a health outcome would also fit within the scope of the question on complementary feeding for the Infants and toddlers from birth to 24 months (healthy, full-term infants) age group, and could be adjusted to look at memory and focus (cognitive health, generally) for the adults and older adults life stages. This addition to one or more of the life stages would be relevant to the DGA topics given it is an additional health outcome / measure based upon dietary pattern / food-based intake. We are specifically pushing for this additional health outcome in the children and adolescents category given the potential impact on school meal programs, but for similar reasons (i.e., WIC, older American feeding programs, etc.), believe it would be important within the other life stages as well. Lastly, this is not something being addressed elsewhere in the federal government currently.

In conclusion, NPC would like to reiterate that we look forward to working with the Agencies as they move forward in the next edition of the DGAs. The translation of nutrition science into policy is an important task and we look to support the Agencies as they take on this endeavor. Should the Agencies have questions or concerns, please do not hesitate to reach out at johnk@nationalpotatocouncil.org.

Thank you for your consideration of these comments.

Thank you,

John Keeling
Executive Vice President & CEO
National Potato Council

¹ Scientific Report of the 2015 Dietary Guidelines Advisory Committee [Internet]. (2015) Washington (DC): Department of Health and Human Services and USDA. Available from: <http://health.gov/dietaryguidelines/2015-scientific-report/PDFs/Scientific-Report-of-the-2015-Dietary-Guidelines-Advisory-Committee.pdf>.

¹¹ IOM (Institute of Medicine). 2015. Review of WIC food packages: An evaluation of white potatoes in the cash value voucher: Letter report. Washington, DC: The National Academies Press.



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ⁱⁱⁱ National Academies of Sciences, Engineering, and Medicine. 2017. Redesigning the process for establishing the Dietary Guidelines for Americans. Washington, DC: The National Academies Press. doi: <https://doi.org/10.17226/24883>.