January 15, 2020

Barbara Schneeman, PhD
Chair, 2020 Dietary Guidelines Advisory Committee
Dietary Guidelines Advisory Committee
c/o USDA Food and Nutrition Service
Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034; Alexandria, VA 22302

Re: Comments in response to Federal Register No. 2019-04543- Docket ID FNS-2019-0001, 2020 Dietary Guidelines Advisory Committee Proceedings

Dear Dr. Schneeman and Members of the 2020 Dietary Guidelines Advisory Committee,

Drinking plain water in place of sugar-sweetened beverages (SSBs) is a simple, low-cost, feasible behavior modification that can have a major impact on intake of calories and added sugars by the U.S. population. We, the undersigned -- researchers, scientists, nutritionists, clinicians, public health professionals and public health advocates -- encourage the Dietary Guidelines Advisory Committee (DGAC) to provide strong recommendations in your report that urge USDA and HHS to state explicitly and unequivocally, in the new 2020 Dietary Guidelines for Americans, that water should be first for thirst and should be consumed in place of SSBs. Your recommendations should request the agencies to take the needed steps to add a symbol for water to the MyPlate graphic. Further, we recommend that your report provide clear, actionable information on ways to make plain water a beverage of choice, for example by recommending strategies to provide effective access to safe and appealing water, especially tap water, and to promote and educate about healthy beverages.[1, 2, 3, 4, 5, 6, 7, 8] These recommendations will help reduce SSB consumption by supporting and enabling the healthy alternative, drinking water. (We wish to emphasize that we do not recommend discouraging dairy consumption or removing the dairy icon on MyPlate.)

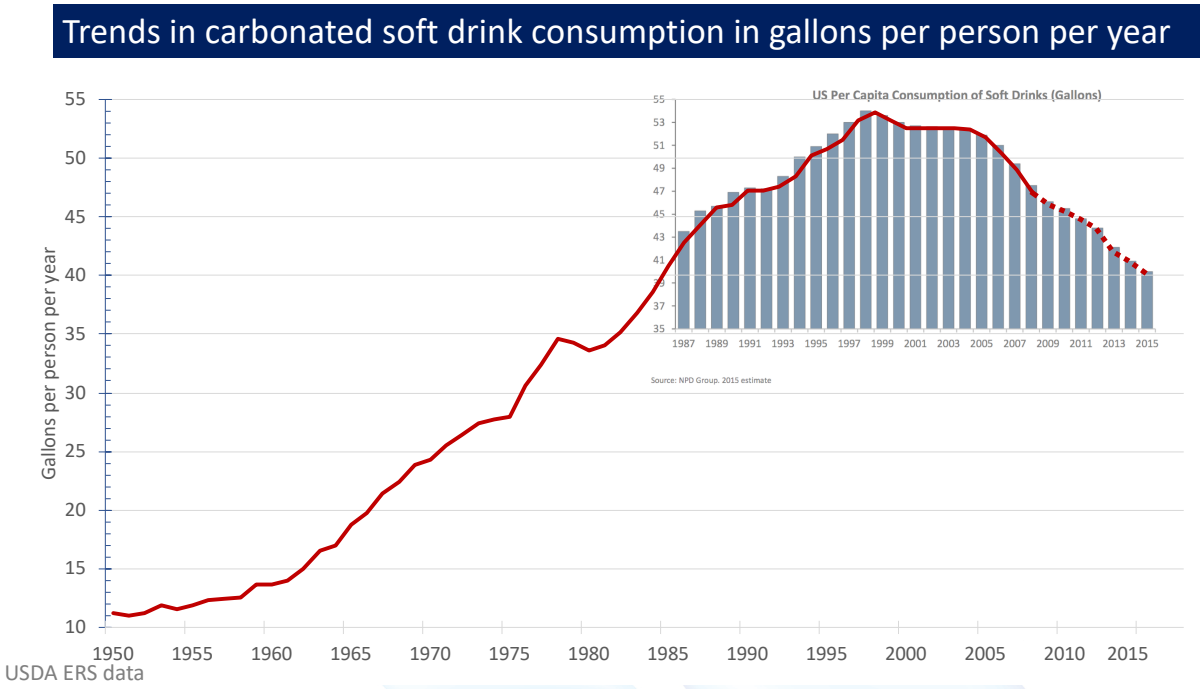
Health impacts of sugar-sweetened beverages

Since a "Best of Science" letter was submitted to the previous DGAC in 2014 (attached), studies continue to confirm that SSBs are a leading contributor to the rates of obesity,[9, 10, 11, 12, 13, 14] type 2 diabetes[15, 16, 17, 18, 19] and other metabolic dysfunction (fatty liver disease, insulin resistance),[20, 21, 22] heart disease (hypertension, dyslipidemia, stroke, coronary and cardiovascular disease)[23, 24, 25, 26, 27, 28] and tooth decay.[29, 30] Sources of liquid sugars, such as SSBs, may be uniquely harmful to health.[31] Recent studies suggest SSB consumption may be linked to additional health impacts including increased risk of mortality,[32] risk of asthma,[33, 34] and the risk of certain cancers; further research is warranted.[35]

An ever more obese nation

Prevalence of overweight and obesity in the U.S. is at an all-time high.[36, 37] A recent report predicts that our nation's obesity crisis will continue to grow: that within just ten years (i.e., by 2030) nearly one-half of U.S. adults will have obesity; one-quarter will have severe obesity.[38] Overweight is the primary disqualifier for fitness for U.S. military service.[39] Type 2 diabetes and non-alcoholic fatty liver disease are afflicting more, and younger, people.[40, 41, 42]

SSBs remain heavily consumed



Graph courtesy of Kristine Madsen, MD, University of California, Berkeley

In recent years, public health efforts to promote a reduction in the consumption of SSBs have intensified.[43, 44, 45, 46] Despite some success by these efforts as reflected in recent declines, consumption of SSBs remains well above recommended levels.[47]

In order to support policy, practices and programs promoting water consumption and clear and consistent nutrition education on healthy beverage habits, as well as to message the public, **we urge that both the Dietary Guidelines for Americans and MyPlate should clearly and consistently encourage the benefits of water consumption in place of SSBs.**

Thank you for this opportunity to provide our comments.

Yours sincerely,

Organizations

Individuals

Abbey Alkon, RN, PNP, MPH, PhD
Department of Family Health Care Nursing
School of Nursing
University of California, San Francisco

Jennifer Woo Baidal, MD, MPH
Division of Pediatric Gastroenterology, Hepatology, and Nutrition
Columbia University Medical Center
New York-Presbyterian Morgan Stanley Children's Hospital

Sara N. Bleich, PhD
Harvard T.H. Chan School of Public Health
Radcliffe Institute for Advanced Study
Harvard Kennedy School

Claire Brindis, DrPH
Philip R. Lee Institute for Health Policy Studies
Department of Pediatrics
Department of Obstetrics, Gynecology, and Reproductive Health Sciences
University of California, San Francisco

Kelly D. Brownell, PhD
World Food Policy Center
Duke University

David A. Cleveland, MS, PhD
Environmental Studies Program and Department of Geography
University of California, Santa Barbara

Angie L. Cradock, ScD, MPE
Harvard T.H. Chan School of Public Health

Pat Crawford, DrPH, RD
Nutrition Policy Institute
Division of Agriculture & Natural Resources
University of California

William Dietz, MD, PhD
Redstone Global Center for Prevention and Wellness
Milken Institute School of Public Health
The George Washington University

Fatinah Darwish, MPH, RD
Los Angeles County Department of Public Health

Molly DeVinney, MPH
Sugar Freedom Project

Lori Dorfman, DrPH
Berkeley Media Studies Group

Jen Falbe, ScD, MPH,
Nutrition and Human Development
University of California, Davis

Jake Ferreira
Mission: Readiness

Tracy Fox, MPH, RD
Food, Nutrition & Policy Consultants, LLC

Anne Froment
Division of Nephrology and Hypertension
University of North Carolina at Chapel Hill

Christopher Gardner, PhD
Stanford University

Edward Giovannucci, MD, ScD
Departments of Nutrition and Epidemiology
Harvard T.H. Chan School of Public Health

Praveen S. Goday, MBBS, CNSC
Pediatric Gastroenterology and Nutrition
Medical College of Wisconsin

Anna Grummon, PhD, MSPH
Harvard T.H. Chan School of Public Health

Sarah Hampl, MD
General Pediatrics and Weight Management
Center for Children's Healthy Lifestyles & Nutrition
Children's Mercy Kansas City
University of Missouri, Kansas City School of Medicine

Jeannie Huang, MD, MPH
Pediatric Gastroenterology Hepatology and Nutrition
University of California San Diego
Rady Children's Hospital San Diego

Glenda Humiston
Vice President, Agriculture and Natural Resources
University of California, Office of the President

David L. Katz, MD, MPH
True Health Initiative
Yale-Griffin Prevention Research Center

Cristin Kearns, DDS, MBA
Philip R. Lee Institute for Health Policy Studies
Division of Oral Epidemiology & Dental Public Health
School of Dentistry
University of California, San Francisco

Hannah Lawman, PhD
Drexel University

Ingrid Lofgren, PhD, MPH, RD
Department of Nutrition and Food Sciences
College of Health Sciences
University of Rhode Island

Robert H. Lustig, MD
Division of Endocrinology
Weight Assessment for Teen and Child Health (WATCH) Program
University of California, San Francisco

Kristine Madsen, MD, MPH
Berkeley Food Institute
School of Public Health
University of California, Berkeley

Vasanti Malik, ScD
Department of Nutritional Sciences, Faculty of Medicine
University of Toronto
Department of Nutrition
Harvard T.H. Chan School of Public Health

Tania Marquez, MPH
Los Angeles County Department of Public Health

Ashley E. Mason, PhD
Department of Psychiatry
Osher Center for Integrative Medicine
University of California, San Francisco

Kathleen J. Melanson, PhD, RD, LDN
Department of Nutrition and Food Sciences
College of Health Sciences
University of Rhode Island

Shu Wen Ng, PhD, FTOS
Department of Nutrition
Gillings School of Global Public Health
University of North Carolina at Chapel Hill

Brietta M. Oaks, PhD, MPH
Department of Nutrition and Food Sciences
College of Health Sciences
University of Rhode Island

Anisha Patel, MD, MSPH, MSHS
Stanford University

Rafael Pérez-Escamilla, PhD, Dr. Honoris Causa
Member of the National Academy of Medicine
Yale School of Public Health

Gregory Pierce, PhD
Luskin Center for Innovation
University of California, Los Angeles

Barry M. Popkin, PhD
Department of Nutrition
University of North Carolina at Chapel Hill

Francisco Ramos-Gomez, DDS, MS, MPH
Section of Pediatric Dentistry
School of Dentistry
University of California, Los Angeles

Eric Rimm, ScD
Harvard T.H. Chan School of Public Health

Daniel Rizik-Baer, MSW
Los Angeles County Department of Public Health

Mica Root
Johns Hopkins Bloomberg School of Public Health

Asher Yoel Rosinger, PhD, MPH
Pennsylvania State University

Marlene B. Schwartz, PhD
Rudd Center for Food Policy & Obesity
University of Connecticut

Laura Schmidt, PhD, MSW, MPH
Philip R. Lee Institute for Health Policy Studies
Department of Anthropology, History and Social Medicine
School of Medicine
University of California, San Francisco

Dipa Shah, MPH, RD
Los Angeles County Department of Public Health

Carmen Byker Shanks, PhD, RDN
College of Education, Health & Human Development
Montana State University

Sonya Shin, MD, MPH
Harvard Medical School
Brigham and Women's Hospital

Wendelin Slusser, MD, MS, FAAP
David Geffen School of Medicine
Fielding School of Public Health
University of California, Los Angeles

Karen Sokal-Gutierrez, MD, MPH
School of Public Health
University of California, Berkeley

Kimber L. Stanhope, PhD, MS, RD
Department of Molecular Biosciences
University of California, Davis

Jodi Stookey, PhD
Nutrition Epidemiology
Arizona State University

Mary Story, PhD, RD
Duke Global Health Institute, Duke University
Healthy Eating Research National Program, Robert Wood Johnson Foundation

Qi Sun, MD, ScD
Harvard T.H. Chan School of Public Health

Jezra Thompson
Gardening and Cooking Program
Berkeley Unified School District

Alison Tovar, PhD, MPH
Department of Nutrition and Food Sciences
College of Health Sciences
University of Rhode Island

Lara Turnbull, MPH
Southern California Public Health Association

Maya Vadiveloo, PhD, RD
Department of Nutrition and Food Sciences
University of Rhode Island

Petra Wilder-Smith DDS, PhD
Beckman Laser Institute
Chai Family Comprehensive Cancer Center
University of California Irvine

Stella Lucia Volpe, PhD, RDN, ACSM-CEP, FACSM
Department of Nutrition Sciences
College of Nursing and Health Professions
Drexel University"

Laura Zatz, MPH
Harvard T.H. Chan School of Public Health

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