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COMMITTEE ON COMMERCE, SCIENCE, AND TRANSPORTATION
UNITED STATES SENATE

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Good afternoon, Mr. Chairman, and Members of this Subcommittee. I am John D. Graham, Ph.D., Administrator, Office of Information and Regulatory Affairs (OIRA), Office of Management and Budget. I appreciate this opportunity to testify before you today on the review and revision of the *Dietary Guidelines for Americans* and the *Food Guide Pyramid*. This has long been an area of strong interest for me. Prior to joining OMB, I served for 17 years on the faculty of the Harvard School of Public Health, where I founded the Harvard Center for Risk Analysis. In this capacity, I learned about the powerful impact of dietary choices on public health.

One of my first actions at OMB was to issue a “prompt” letter to the Food and Drug Administration (FDA), encouraging the agency to finalize its rulemaking to require that amounts of *trans* fat be listed in the nutrition labels on all food. FDA issued the final rule in July. Given the strong scientific link between the consumption of *trans* fat and

coronary heart disease (CHD), it is hoped that consumers will factor information about *trans* fat content into their food purchasing decisions. The increased attention on *trans* fat content should encourage food manufacturers to reduce the amount of *trans* fat in their products. The rule is expected to have a multibillion dollar effect in health benefits through the reduction of fatal and non-fatal heart attacks.

Although the overall health of Americans continues to improve, we have serious health problems in this country related to people being overweight and obese. These conditions are significant risk factors for heart disease and other chronic illnesses. Accordingly, on May 27, 2003, I issued another prompt letter to the Departments of Agriculture and Health and Human Services requesting that, as they consider changes to these very important and influential policy documents, they take into account the wide body of new scientific knowledge surrounding the links between food consumption and health outcomes.

The current dietary guidelines, while going a long way toward encouraging healthy eating behaviors, are not adequately designed to most effectively promote positive public health outcomes. Recent studies suggest that adherence to the *Dietary Guidelines* has only a modest impact on the risk of cardiovascular disease, and no significant impact on other chronic diseases, such as cancer. Given the wide-ranging impact that the *Dietary Guidelines* have on American dietary intake patterns, we believe that revisions to these guidelines, based on sound science, can have a meaningful impact on overall public health. For instance, CHD is our nation's largest cause of premature

death for both men and women, killing over 500,000 Americans each year. It has been shown that even a modest improvement in dietary habits may lead to significant reductions in morbidity and mortality due to CHD.

One of my principal concerns with the current *Dietary Guidelines* is that, with respect to fat intake, they focus almost exclusively on the reduction of intake of saturated fats and cholesterol. They do not adequately account for other types of “bad” fats, such as *trans* fatty acids, and “good” fats, such as omega-3 fatty acids. There is a growing body of evidence that suggests that consumption of *trans* fatty acids, in addition to consumption of saturated fats and cholesterol, increases the risk of CHD, and that consumption of omega-3 fatty acids reduces the incidence of death due to CHD. The recent revision to the American Heart Association’s dietary guidelines recognizes this evidence regarding omega-3 fatty acids by recommending consumption of certain fish (those highest in omega-3 fatty acids) at least twice a week and inclusion of oils and other food sources high in omega-3 fatty acids.

The *Food Guide Pyramid*, which was first introduced in 1992, is also a critically important source of consumer information about healthy dietary patterns. As noted in the *Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans* (2000), consumers find the *Pyramid* to be the most useful part of the *Dietary Guidelines*. In fact, the *Dietary Guidelines* themselves suggest that readers “let the pyramid guide your food choices.”

Given the emphasis on the easy-to-understand *Pyramid*, revisions should better differentiate the health benefits and risks from different types of foods to encourage healthier eating habits. The current *Pyramid*, for example, combines meat, poultry, fish, dry beans, eggs, and nuts into a single “Meat and Beans Group.” Research suggests, however, that these foods may not be equivalent in terms of their health effects. Consideration should therefore be given to grouping foods that have similar health effects so that consumers can make more informed dietary choices.

Section 301 of the National Nutrition Monitoring and Related Research Act of 1990 (7 U.S.C. 5341) requires the Secretaries of USDA and HHS to jointly publish a report entitled *Dietary Guidelines for Americans* at least every 5 years. The last report was published in 2000. OMB plans to work closely with the Departments of Agriculture and Health and Human Services as they consider revisions to the *Dietary Guidelines for Americans*. USDA and HHS have appointed members to a Dietary Guidelines Advisory Committee, which is composed of 13 nationally recognized experts in the field of nutrition. This Committee has been established to review the available science and provide expert advice as the revision process goes forward. USDA has just published a request for comment on the proposed daily food intake patterns and the supporting technical data for the *Pyramid*. These proposed patterns and data, along with the comments received through the notice, will be shared with the 2005 Dietary Guidelines Advisory Committee. The Advisory Committee will issue a report to the Secretaries of Agriculture and Health and Human Services, with suggested text for the *Dietary Guidelines* and rationale for any changes made from the 2000 edition. The report should

be made public by the fall of 2004. The revisions to the *Dietary Guidelines* and the *Pyramid*—which are scheduled to be published by USDA and HHS in the winter of 2005—will work in concert, and the Advisory Committee will inform both processes

OMB's collaborative efforts with USDA and HHS will complement our oversight responsibilities in a related area: information quality. Under the Information Quality Law¹, OMB has developed government-wide guidelines to ensure and maximize the quality of information disseminated by agencies, information such as that contained in the *Dietary Guidelines* and the *Pyramid*. OIRA's ability to play a stronger role in these issues in the years ahead will be enhanced with the recent addition to OIRA's staff of analysts with expertise in the fields of toxicology, epidemiology, decision science, and health policy.

In conclusion, we support ongoing efforts to revise and update to the *Dietary Guidelines* and the *Food Guide Pyramid*. In particular, we recommend that they emphasize the benefits of reducing the consumption of foods that are high in *trans* fatty acids and increasing the consumption of foods that are rich in omega-3 fatty acid. That concludes my prepared testimony. If you have any questions, I would be happy to answer them.

¹ Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554; H.R. 5658).