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EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

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To Save Lives, OMB Urges Revising Dietary Guidelines

New information on reducing heart disease risk encouraged

Washington, DC – OMB today urged the Departments of Health and Human Services (HHS) and Agriculture (USDA) to revise the nation's dietary guidelines to include new information that omega-3 fatty acids may reduce the risk of coronary heart disease (CHD), while *trans* fatty acids may increase the risk of CHD. Since CHD kills over 500,000 Americans each year, even a small improvement in dietary habits could save thousands of lives. A copy of the letter sent to HHS and USDA follows this release.

"Health researchers have found that Americans can significantly reduce the risk of heart disease with a modest change in their diets. The government should make this life-saving information as widely available as possible," said Dr. John Graham, Administrator of OMB's Office of Information and Regulatory Affairs (OIRA).

In the letter, OMB recommends that HHS and USDA modify the *Dietary Guidelines* and *Food Guide Pyramid,* the cornerstones of the government's nutritional information. The *Dietary Guidelines* affect the content of more than 25 million school lunches, while the *Food Guide Pyramid* appears on many food products, providing consumers with an outline of what to eat each day. Revised every five years, the *Dietary Guidelines* are scheduled to be updated in 2005. The *Food Guide Pyramid* has not been updated since 1992.

According to recent articles in the *American Journal of Clinical Nutrition*, following the current *Dietary Guidelines* only reduces slightly the risk of cardiovascular diseases such as CHD. In the letter, OMB recommends that HHS and USDA take into account new evidence on the benefits of omega-3 fatty acids and risks of *trans* fatty acids when revising the nation's dietary guidelines. For example, the American Heart Association recently revised its dietary guidelines to recommend consuming fish, which is high in omega-3 fatty acids, twice weekly to prevent CHD.

The letter continues the Bush Administration's efforts to help Americans lead longer, better, and healthier lives. The President's 2004 budget proposes a $100 million increase for combating diabetes, reducing rates of obesity, and alleviating the health complications due to asthma. In 2002, the President launched the HealthierUS Initiative, which promotes physical fitness and sports participation among all Americans, with an emphasis on children and adolescents.

OMB's recommendations come in the form of a "prompt" letter, a tool introduced by the Bush Administration. While not forcing agency action, prompt letters alert agencies to issues that OMB considers worthy of priority status. All "prompt" letters, as well as agency responses, can be viewed at www.omb.gov.

-- letter follows --

May 27, 2003

Honorable Claude A. Allen
Deputy Secretary
Department of Health and
Human Services
Washington, D.C. 20201

Honorable James R. Moseley
Deputy Secretary
Department of Agriculture
Washington, D.C. 20250

Dear Mr. Allen and Mr. Moseley:

The purpose of this letter is to request that the Department of Agriculture (USDA) and the Department of Health and Human Services (HHS) further incorporate the large body of recent public health evidence linking food consumption patterns to health and disease as the *Dietary Guidelines for Americans* is revised for its scheduled 2005 release and to update the *Food Guide Pyramid,* which was introduced in 1992.

Secretary Thompson has made it clear that both childhood overweight and adult obesity and the associated chronic health problems such as heart disease are widespread in the United States, and have become one of our nation's most important public health problems. However, recent studies suggest that adherence to the *Dietary Guidelines* has only modest impact on the risk of cardiovascular disease and no significant impact on other chronic diseases such as cancer. OMB believes that these and other studies should play a prominent role as USDA and HHS revise the guidelines. Given the wide reach of the federal nutrition guidelines, we believe that good nutrition habits fostered by improved information on the links between diet and health will have a significant health impact, especially in reducing heart disease. Coronary heart disease (CHD) is our nation's largest cause of premature death for both men and women, killing over 500,000 Americans each year. Even a modest improvement in dietary habits may lead to significant reductions in the number of premature deaths from CHD.

We recognize that the 2000 *Dietary Guidelines* made some changes in recommendations that may reduce cardiovascular risk. We nonetheless urge you to reconsider all available nutritional and medical evidence as you develop the new guidelines. For example, in a previous letter addressed to HHS, we encouraged the Food and Drug Administration (FDA) to finalize a rule to require a product's Nutrition Facts panel to include the amount of *trans* fatty acids present in foods. As you know, there is a growing body of scientific evidence, both experimental and epidemiological, that suggests consumption of *trans* fatty acids increases the risk of CHD. Another important risk factor is the omega-3 fatty acid content of food. Both epidemiologic and clinical studies find that an increase in consumption of omega-3 fatty acids results in reduced deaths due to CHD. The recent revision of the American Heart Association's (AHA's) dietary guidelines recognizes this evidence by recommending consuming fish, which is high in omega-3 fatty acids, at least twice weekly to reduce the risk of CHD. In addition, the AHA recommends the inclusion of oils and other food sources high in omega-3 fatty acids.

The current *Dietary Guidelines* targets only the reduction of saturated fat and cholesterol, with only a brief reference to the risks from *trans* fatty acids and benefits of omega-3 fatty acids. We encourage you to consider strengthening the language in the guidance and to modify the *Food Guide Pyramid* to better differentiate the health benefits and risks from foods. As noted in the *Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans* (2000), consumers find the *Food Guide Pyramid* to be the most useful part of the *Guidelines* and the *Guidelines* itself encourages readers to "let the pyramid guide your food choices." Yet the current *Food Guide Pyramid*, for example, groups meat, poultry, fish, dry beans, eggs, and nuts into a single "Meat and Beans Group" when research suggests that these foods may not be equivalent in terms of their health effects.

Given the significant potential improvement in public health suggested by current evidence, we urge you to consider revising the *Dietary Guidelines* and *Food Guide Pyramid* to emphasize the benefits of reducing foods high in *trans* fatty acids and increasing consumption of foods rich in omega-3 fatty acid.

We would like to set up a meeting with your agencies in the next few weeks to discuss this issue. As always, the OIRA staff stands ready to assist you in these efforts.

Sincerely,

John D. Graham
Administrator
Office of Information and Regulatory Affairs

Appendix of Selected Works

Comments of Pizzey Milling - Docket No. 2006D-0066

Guidance for Industry and FDA Staff: Whole Grains Label Statements

1. Slavin, J. 2004. Whole grains and human health. *Nutr Research Rev;* 17, 99-110.

2. Hadley, M., Lacher, C., Mitchell-Fetch, J. 1992. Fiber in Flaxseed. Proc. Flax Inst; 54: 79-83.

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6. Alessio Fasano, MD, et. al., Arch Intern Med. 2003;163:286-292.

7. Cunnane SC, Ganguli S, Menard C, et al. 1993. High α-linolenic acid flaxseed (*Linum usitatissimum*): Some nutritional properties in humans. Br. J. Nutr; 69: 443-453; Cunnane SC, Hamadeh MJ, Liede AC, et al. 1995.

8. Bierenbaum ML, Reichstein R, Watkins TR. 1993. Reducing atherogenic risk in hyperlipemic humans with flax seed supplementation: A preliminary report. J. Am. Coll. Nutr; 12: 501-504.

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10. Jenkins DJA, Kendall CWC, Vidgen E, et al. 1999. Health aspects of partially defatted flaxseed, including effects on serum lipids, oxidative measures, and ex vivo androgen and progestin activity: A controlled crossover trial. Am. J. Clin. Nutr; 69: 395-402.

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13. American Dietetic Association. 1997. Health implications of dietary fiber -- Position of ADA. J Am Diet Assoc; 97:1157-1159.