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Mark McClellan, M.D., Ph.D.
Commissioner for Food and Drugs
Food and Drug Administration
Rockville, MD 20857

RE: Docket number 2003N-0338

Dear Dr. McClellan:

Thank you for organizing the recent meeting on obesity and most of all for your interest in addressing the obesity epidemic along with Secretary Thompson, Dr. Gerberding, and Surgeon General Carmona.

Everyone agrees this problem is going to require action from many different organizations addressing numerous areas to be effective. These efforts will need to involve research, education, legislation, and health care reimbursement. It will be necessary to work with the food industry, other businesses, and governmental departments. It will be imperative to emphasize both treatment and preventive efforts. There were many good ideas brought up at the meeting and rather than reiterate all of them, the vast majority of which I agree with, I would like to briefly discuss a background perspective and hi-light a few specific suggestions that I believe are particularly important.

There is general consensus that something in the environment has changed over the past few decades that has promoted the marked increase in weight over this relatively very short period of time in human evolution. In addition, this has affected a high proportion of the population, occurred against people's desires, and long-term results from treatments have not been effective (except bariatric surgery). These facts suggest the factors responsible for this epidemic are collectively *powerful and pervasive*. In addition, whatever factors are responsible *must* ultimately operate through energy intake or energy expenditure.

Therefore, to effectively deal with this, we must use strategies that also ultimately affect energy intake and energy expenditure as well as being powerful and pervasive in their own right. A public health problem requires a public health solution. Just as we do not need to know the mechanisms of how smoking causes lung cancer to get people to quit smoking and decrease the incidence of cancer, we do not need to know the precise factors

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responsible for this increase in weight as long as we use strategies that ultimately accomplish the goal of decreasing energy intake and increasing energy expenditure among the general population.

I would argue that strategies cannot rely primarily on education or individual choice. The factors promoting obesity are too powerful and pervasive. It is human nature to eat to satiety and "take the short cut", i.e., we are hot-wired to eat more and move less. Teleologically, this makes sense – these genetically programmed tendencies increased survival for most of human evolution. Now our limbic brains are hurting us in an environment where it is easy to get calories and effort is required to expend energy.

Given the above argument, I would suggest the following specific strategies:

- I. Change the environment to promote physical activity within our daily lives. This should be insidious, nonvolitional, and affect a large proportion of the population.
 - A. Provide economic and other incentives for communities.
 1. Design and redesign walking and biking paths as a primary mode of transportation.
 2. Encourage redesign of new and existing building construction of all types to promote stairs as a central way of getting from floor to floor within a couple floors, and elevators as a secondary means when traversing a large number of floors.
 3. Discourage 'step-saving' activities such as moving walkways in airports, escalators, etc. (While still making allowances for individuals with disabilities).
 4. Encourage community 'contests' or other programs to increase physical activity such as was described in Colorado.
 5. Require physical activity in schools. This could be traditional physical education or a new emphasis on 'lifestyle' activities.
 - B. Provide incentives for businesses.
 1. Encourage employees to walk or bike to work.
 2. Encourage businesses to design wellness programs. There is increasing data that these are cost effective.
 3. Encourage physical activity breaks throughout the day.
- II. Promote the intake of low energy dense foods and discourage the intake of high energy dense foods.
 - A. Readjust our national price support system to subsidize vegetables and fruits and decrease our subsidies of high energy dense foods such as the current commodities that are supported.
 - B. Encourage consumption of vegetables, fruits and whole-grain products directly from the grower to the consumer. This could be done through farmer's markets or economic incentives for businesses.
 - C. Evaluate and redesign school nutrition programs to better align with these obesity-reduction efforts. School education programs should also be evaluated and redesigned.

- III. Encourage the food industry, possibly through economic incentives, to make changes in food labeling including recognition of appropriate portion size and units of food, as it has been shown that people eat in units of food.
- IV. Encourage the food and restaurant industry to participate in this effort through controlling portion size, calories, healthfulness, palatability of healthful foods, etc. Creative strategies will need to be developed to make this financially viable for them.
- V. Encourage obesity research ranging from epidemiological to applied. The health and financial implications of the obesity epidemic are such that we need to invest correspondingly in research efforts to deal with it. This should include a comprehensive pragmatic component to bridge the gap between research and practice, and promote 'best practices' that have been shown to be effective.
- VI. Develop education and legislative efforts to counteract ineffective and potentially harmful methods of weight loss such as some dietary supplements.

The list above is certainly not complete. There are many other possible strategies that can and should be utilized. I wanted to highlight these suggestions as ones that I believe are particularly relevant and/or may not be emphasized by others.

Once again, thanks for your efforts. It will require a tremendous investment of time, effort, and money if we are going to effectively deal with this rapidly progressive public health problem. If I can be of further help, please don't hesitate to contact me.

Sincerely,



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