



Comment on FR Doc # 2019-12806

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Comment

RE: Request for clarification on Food Groups and Categories used by the 2020 DGAC Data Analysis and Food Pattern Modeling Subcommittee

During Meeting 4 of the 2020 Dietary Guidelines Advisory Committee (DGAC) the Data Analysis and Food Pattern Modeling Subcommittee reviewed the results of various food group and food category analyses completed using 2013-2016 NHANES food intake survey data combined with What We Eat in America (WWEIA) food categories [1]. We have assembled a list of observations related to these analyses:

During Meeting 4 WWEIA food category contributions to nutrients and food groups of concern were presented. However, the methodology used to combine and separate various food sub-categories used to create the top 10 contributors to nutrients of concern and food groups was not presented.

Sandwiches are a sub-category of mixed dishes in the WWEIA food categories. Data for this sub-group was not presented during Meeting 4, but rather for an undefined sub-category named "burgers and sandwiches". Based on previous evidence, "sandwiches and burgers" rather than "burgers and sandwiches" accurately represents the available data as, according to analysis of 2009-2012 NHANES data, the sub-category of sandwiches includes a variety of sandwich types including cold-cut sandwiches (27%), burgers (17%), poultry sandwiches (12%), hot dogs/sausages (10%), egg sandwiches (8%), and peanut butter sandwiches (6%) [2].

- Analysis of the top contributing sandwich types to this sub-category using 2013-2016 NHANES data will allow the WWEIA sandwich food sub-category to be ranked, in order, according to the top sandwich contributors.

Sandwich types are defined by their predominant filling [2], yet data regarding predominate fillings was not made available during Meeting 4. Such analysis would, for example, further understanding of the contribution of beef, turkey, soy and other plant-based burgers to the burger category.

The 2020 DGAC Subcommittee has an opportunity to provide analyses that demonstrate how to practically improve the quality of sandwiches to further their positive contribution, while lessening their negative contributions.

-The positive contributions of the "burgers and sandwiches" category were outlined during the DGAC Meeting 4 and included recognition of this category as a top contributor of calcium, potassium, and Vitamin D across various life stages [3].

-This is consistent with evidence from 2009-2012 NHANES where sandwiches were found to contribute 15% of calcium, 10% of Vitamin D, and 9% of potassium intake by adults [2].

The negative contributions of this category were also highlighted (e.g. sodium and excess energy) but it is unclear what aspect of the many ingredients in the category provided these nutrients, e.g. cold-cuts, cheese, grains or meat nor was the specific contribution made by "burgers" discussed.

-Evidence from NHANES 2013-2016, presented during Meeting 4, suggests the "burgers and sandwiches" food sub-category is the leading contributor to sodium and calories.

-However, based on analysis of WWEIA NHANES 2007-2010 data, beef in sandwiches contributes only 2.4% of energy and 2.2% of sodium to the sandwich food sub-category [4],

ID: FNS-2019-0001-43888

Tracking Number: 1k4-9flw-75o2

Document Information

Date Posted:

Mar 19, 2020

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suggesting that consumption of beef hand-helds likely makes only a minor contribution to intake of these nutrients in this food sub-category.

The sandwich category has been consistently recognized as a popular meal for busy Americans, as well as a contributor to important under-consumed nutrients and an opportunity to improve the quality of American diets [2,3,5,6]. For these reasons, we request the DGAC Subcommittee provide additional analyses to enable understanding of the WWEIA food categories, their contributions to the diet, and how to practically improve the quality of sandwiches, including burgers, to enhance the positive role they can play in realistic, healthy diets for Americans.

(See Attachment A for References)

Attachments (1)

[Attachment_A_References](#)

View Attachment: 

References

1. 2020 DIETARY GUIDELINES ADVISORY COMMITTEE Fourth Meeting – January 23, 2020 Afternoon Session Webcast
https://www.youtube.com/watch?v=fRq_F2me8Tc&feature=youtu.be 1:45
2. Sebastian RS, et al. Sandwich consumption by adults in the U.S.: What We Eat In America, NHANES 2009-2012. Food Surveys Research Group Dietary Data Brief No. 14. December 2015. Available at
https://www.ars.usda.gov/ARSUserFiles/80400530/pdf/DBrief/14_sandwich_consumption_0912.pdf
3. 2020 DIETARY GUIDELINES ADVISORY COMMITTEE Fourth Meeting – January 23, 2020 Afternoon Session Webcast
https://www.youtube.com/watch?v=fRq_F2me8Tc&feature=youtu.be 2:05
4. Internal Report. Data available upon request.
5. Sebastian RS, et al. Sandwiches Are Major Contributors of Sodium in the Diets of American Adults: Results from What We Eat in America, National Health and Nutrition Examination Survey 2009-2010 J Acad Nutr Diet. 2015;115:272-7.
6. Scientific report of the 2015 Dietary Guidelines Advisory Committee. Available at
<https://www.dietaryguidelines.gov/current-dietary-guidelines/process-develop-2015-2020-dg/advisory-committee>