



July 11, 2019

Dietary Guidelines Advisory Committee
Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear Members of the Dietary Guidelines Advisory Committee,

My name is Sally Greenberg and on behalf of the National Consumers League (NCL), I'd like to thank you for your tireless work in providing expert guidance to Americans in eating a healthful diet and helping them achieve and maintain a healthy weight, promote health, and prevent disease. We appreciate the opportunity to provide comments to this Advisory Committee. We will focus those comments on one issue that we believe might be overlooked: the issue of portion balance as a strategy for achieving greater health for all Americans in the *2020-2025 U.S. Dietary Guidelines*.

In February 2019, NCL, along with two national consumer advocacy organizations and six leading food industry trade associations, joined together to call on the USDA and the HHS to highlight the importance of portion balance in the new guidelines.¹

Throughout our 120-year history, NCL has focused on food safety and nutrition. At the turn of the 20th century, in fact, our founders advocated for the need of safe drinking water and safe milk and protecting consumers against adulterated foods. Today the issues are different, but are every bit as pressing.

Obesity continues to take its toll on the overall health of Americans and is projected to affect 115 million adults by the year 2030.² This projection is due, in large part to an increase over the last four decades in the portion sizes of meals, snacks, and beverages.

One promising, and we think underutilized, strategy for tackling the obesity epidemic is helping consumers understand and implement appropriate portion balance. In a 2014 report, the McKinsey Global Institute found that interventions to control portion size – such as reducing the size of

¹https://d3n8a8pro7vhm.cloudfront.net/ncl/pages/4840/attachments/original/1549422351/Portion_Control_Letter_February_5_2019_Final.pdf?1549422351

² <https://www.hhs.gov/fitness/resource-center/facts-and-statistics/index.html>

packaged foods, fast food, and high-calorie beverages – could be the single most cost-effective measure leading to reduced obesity.³

Unfortunately, while the current version of the *Dietary Guidelines* mentions portion size – it appears to be mostly an afterthought among the various strategies to improve diets and fight obesity. Portion balance is not mentioned in the guidelines’ executive summary⁴; this is despite the fact that larger portion sizes have greatly contributed to the problem of overweight and obesity.

We therefore urge the Dietary Guidelines Advisory Committee to include portion balance as a key strategy to addressing the rise of obesity and make education about portion balance a cornerstone of the Guidelines as the Dietary Guidelines Advisory Committee continues its work.

NCL welcomes the opportunity to participate in future discussions as you develop these critically important *Dietary Guidelines* and would be pleased to be a resource in the coming months. Thank you once again for giving the NCL the opportunity to share our concerns.

Sincerely,

Sally Greenberg
Executive Director
National Consumers League

³https://www.mckinsey.com/~media/McKinsey/Business%20Functions/Economic%20Studies%20TEMP/Our%20Insights/%20How%20the%20world%20could%20better%20fight%20obesity/MGI_Overcoming_obesity_Executive_summary.ashx

⁴ 2015-2020 Dietary Guidelines for Americans • Chapter 3 — Page 66,
https://health.gov/dietaryguidelines/2015/resources/2015-2020_Dietary_Guidelines.pdf