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In Reply—A Discussion of the Refutation of Memory-Based Dietary Assessment Methods (M-BMs): The Rhetorical Defense of Pseudoscientific and Inadmissible Evidence

We appreciate the opportunity to respond to the letter submitted by Archer et al,¹ that was written in response to our editorial² accompanying their article published in the July issue of this Journal.³

We would like to first correct several statements made by these authors, which were either misquoted from our article² or misrepresented in their letter. Our position was not, as stated by Archer et al, to “admit” that *their* previously published results⁴ were “well-recognized and acknowledged,” but rather to acknowledge that there are limitations of self-reported dietary intake methodologies in general, which are

acknowledged by researchers who use these methods. The article by Arab et al⁵ was misrepresented in the letter by Archer et al, as this investigation⁵ studied the feasibility of Internet-based dietary assessment, and was not a study of the accuracy of self-reported dietary intake using the Automated Multiple Pass Method, although it is presented by Archer et al in that way. The final misrepresentation is the statement regarding the Dietary Guidelines Advisory Report (DGAC) calling to “expand” the use of memory-based dietary assessment methods data collection, which Archer et al state is “illogical.” Rather, on the page cited, the DGAC⁶ calls for *expanded participation* in the “What We Eat in America” survey by *underrepresented or at-risk groups*, including racial and ethnic minorities, older adults, and pregnant women.

The article published by Archer et al⁴ that was cited in this letter as evidence supporting their position has been very thoroughly critiqued in a previously published research article,⁷ and debated in a series of letters to the editor.^{8,9} Limitations of the approach used by Archer et al were thoroughly presented by Hébert et al.^{7,9} A reiteration of the points already well presented in these articles would not add new discussion points to this dialogue.

The letter by Archer et al refers to the DGAC report as “not scientifically sound” and “poor scientific advising,” which is notable, in light of recent media reports describing efforts by the food industry to fight proposed dietary guidelines (eg, see Reference 10). This media article,¹⁰ which is just one example of several, specially mentions the Coca Cola Company as a major funder of efforts that criticize the DGAC report. Given the stated financial relationship of 2 of the 3 Archer et al authors to the Coca Cola Company, this financial relationship should be taken into consideration when reviewing their stated position. The sections that criticize the DGAC report are *narrowly*

focused on a single issue—the committee’s use of *some* research that used memory-based dietary recall methods. Archer et al’s assertion that the DGAC’s process to develop recommendations “demonstrates a lack of epistemic humility that has significant public health consequences” is unjustified, when the DGAC does in fact highlight the need for randomized controlled trials in many subject areas (eg, Dietary Guidelines Advisory Committee⁶(p12,13,18)) to strengthen the evidence base, as well as the need for dietary biomarker research, to better inform future dietary guidelines.

Unfortunately, the letter by Archer et al fails to add anything substantive to this ongoing dialogue on the validity of self-reported dietary intake data and on the strengths and limitations of the DGAC report. No constructive directions for future research are suggested, but rather a repeated criticism of the committee’s approach to develop much-needed US dietary guidelines.

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