



February 19, 2016

Angela Tagtow
Executive Director
USDA Center for Nutrition Policy and Promotion
Via email: Angela.Tagtow@cnpp.usda.gov and in person

Re: Dietary Guidelines for Americans Listening Session

Dear Ms. Tagtow:

We offer these comments on behalf of the Plant Based Foods Association, a new trade organization representing the nation's leading plant-based food companies.

A similar group of companies submitted comments regarding the 2015 Dietary Guidelines for Americans Committee report. In looking forward, we wish to reaffirm many of the scientifically-sound recommendations from that report, some of which unfortunately did not make it into the final version of the 2015 dietary guidelines.

For example, we support the Advisory Committee's conclusion that the DGA should include a recommendation to "limit red and processed meats". According to the World Cancer Research Fund and most recently, the World Health Organization, red meats and processed meats increase the risk for certain cancers. That's why the American Cancer Society, among other health organizations, recommends limiting consumption of red and processed meats.

The failure to include a clear recommendation in the DGA to reduce red meat does a serious disservice to the American people and their health. We are hopeful that the 2020 version of the DGA will accurately reflect the science to include this recommendation.

The DGA should also make stronger recommendations regarding consuming healthier plant-based protein sources, such as legumes, soy foods, seeds, and nuts, especially in place of red and processed meats. Major health organizations already support recommendations for plant proteins. For example, the American Cancer Society emphasizes a diet based on plant foods.

Moreover, plant-based diets can help solve the nation's nutrient deficiencies. America's population is over-fed and under-nourished: 85% of Americans do not get sufficient vitamins and minerals required for healthy functioning minds and bodies. The majority of nutrients of concern for under-consumption are found primarily in plant foods. An increase in vegetables, fruits, legumes, whole grains, nuts, and seeds will help solve this problem.

Plant-based foods also tend to be high in fiber, vitamins and minerals and low in saturated fat and cholesterol, in contrast to animal-based products, which tend to be high in saturated fat and cholesterol and low in fiber.

Finally, we wholeheartedly endorsed the 2015 committee's recognition of sustainability as an essential component of federal dietary guidance. Simply put, how food production impacts our limited natural resources is critical to the nation's health and food security.

In sum, we were disappointed that the DGA did not include the advisory committee's quite specific and clear conclusion that:

“A diet higher in plant-based foods, such as vegetables, fruits, whole grains, legumes, nuts, and seeds, and lower in calories and animal-based foods is more health promoting and is associated with less environmental impact than is the current U.S. diet.”

This is the type of science-based guidance the American public needs from the DGA.

You also asked about the process for committee selection. It's vitally important that members are free of conflicts of interest. In the past we have seen how members with ties to certain sectors of the food industry can bias the review process. Ironically, despite the controversy over the recent advisory report, the 2015 committee was relatively free of such conflicts.

The problems in process in 2015 were not with the committee members, nor with the methods of scientific review, but rather in the politics. Concerns over science was used as a smokescreen by some who have a vested interest in the outcome.

We hope that going forward for 2020 and beyond, the science that clearly demonstrates the need to shift away from eating animal foods such as red meat, and towards more plant-based foods, trumps the politics we saw in 2015.

Thank you for the opportunity to comment on this important matter and look forward to working together toward our common goal of improving the health of all Americans.

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