

May 16, 2022

Admiral Rachel L. Levine, MD
Assistant Secretary for Health
U.S. Public Health Service
U.S. Department of Health and Human Services

Janet de Jesus, MS, RD
Nutrition Advisor
Division of Prevention Science
Office of Disease Prevention and Health Promotion
U.S. Department of Health and Human Services

Re: Request for Comments on Scientific Questions to Be Examined to Support the Development of the Dietary Guidelines for Americans 2025-2030; Docket No. HHS-OASH-2022-0005-0001

Dear Assistant Secretary Levine and Ms. de Jesus,

We, the undersigned organizations, are committed to ensuring the well-being of Americans through nutritious, well-balanced diets, and a healthy food system. We appreciate the opportunity to comment on the proposed list of scientific questions for the 2025-2030 Dietary Guidelines for Americans (DGA). However, we are concerned that the Departments' proposal to address sustainability outside of the 2025 Dietary Guidelines Advisory Committee (DGAC) would compromise its long overdue incorporation into the next edition of the DGA. Incorporating the relationship between nutrition and climate change and the related environmental crises into the development of the next DGA is urgently needed. This will support long-term food and nutrition security, the administration's stated priorities around equity and the climate crisis, and the Departments' priorities for the proposed scientific questions regarding importance to public health, impact to federal programs, and research availability. **Thus, we urge HHS and USDA to develop sustainable dietary pattern recommendations as a core part of the 2025-2030 DGA by integrating such content into the 2025 DGAC's scope of work and ensuring that any separate process is equally rigorous and incorporated into the guidelines.**

Fundamentally, no substantial conflict exists between health-related and sustainability-related dietary recommendations for the U.S. population. Extensive reviews integrating nutrition and sustainability recommendations advocate for increased intake of fruits, vegetables, beans and legumes and reduced intake of meat, especially red meat.¹ Despite the compatibility, the DGAs to date have not included a substantial body of scientific literature on healthy, sustainable diets. The 2015 DGAC noted that evidence indicates health-related and sustainability-related nutrition recommendations are fundamentally aligned not only with each other, but with current and future food security and overall food system resilience,² two of the Biden administration's stated policy priorities. In addition, the administration's focus on health equity and environmental justice further necessitates the inclusion of sustainability in the DGA due to the

¹ Willett, W., Rockström, J., Loken, B., Springmann, M., Lang, T., Vermeulen, S., ... & Murray, C. J. (2019). Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. *The Lancet*, 393(10170), 447-492. [https://doi.org/10.1016/S0140-6736\(18\)31788-4](https://doi.org/10.1016/S0140-6736(18)31788-4)

² Dietary Guidelines Advisory Committee. 2015. Scientific Report of the 2015 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and the Secretary of Agriculture. Washington, DC: US Department of Agriculture. <https://health.gov/dietaryguidelines/2015-scientific-report>

substantially disproportionate and synergistic adverse impacts of pandemics,³ food deserts,⁴ CAFOs,⁵ slaughter facilities,⁶ and contaminated water supplies⁷ on those who are Black, Indigenous, people of color and underserved communities.

In fact, the President's Executive Order 14008⁸ specifically orders agencies to develop plans for climate change adaptation and resiliency, which can only be achieved by considering the relationship between the climate emergency and food and nutrition security. Furthermore, the first step of adaptation is to minimize the need – that is, mitigate emissions to reduce the urgency and economic expenses of adaptation – which cannot be achieved without addressing food and agriculture. These concepts have been accepted in principle by the President⁹ and USDA¹⁰ in their respective calls for climate-smart agriculture. But the situation demands further action: limiting global diet-related emissions is critical to meeting climate change goals.¹¹ Research shows that if we maintain current U.S. dietary patterns, diet-related emissions will continue increasing, moving us farther from the necessary reductions needed to avoid catastrophic climate change by 2030.¹²

The DGA's outsized impact on public health through food and nutrition policy, agriculture, and government programs— particularly those that serve our most vulnerable populations –necessitates that sustainability be embedded to effectively meet the DGA's goals. Should the Departments proceed with a review of the evidence on this topic separate from the DGAC's scope of work, we urge you to prioritize completing the separate process on a timeline that ensures that the 2025-2030 DGA includes guidance on sustainable dietary patterns. Further, it is imperative that this separate process be at least as scientifically rigorous and transparent as the DGAC review process—including adequate opportunity for public comment on the questions to be addressed, the experts appointed to review the evidence, the methods to be used to review the evidence, and the translation of expert panel conclusions into dietary guidance.

³ Feeding America. The Impact of the Coronavirus on Food Insecurity in 2020 & 2021. <https://www.feedingamerica.org/research/coronavirus-hunger-research>

⁴ Bower, Kelly M., et al. The intersection of neighborhood racial segregation, poverty, and urbanicity and its impact on food store availability in the United States. *Preventive Medicine* 58 (2014): 33-39. <https://doi.org/10.1016/j.ypmed.2013.10.010>

⁵ Donham, K. J., Wing, S., Osterberg, D., Flora, J. L., Hodne, C., Thu, K. M., & Thorne, P. S. (2007). Community health and socioeconomic issues surrounding concentrated animal feeding operations. *Environmental health perspectives*, 115(2), 317-320. <https://doi-org.proxy1.library.jhu.edu/10.1289/ehp.8836>

⁶ Replogle, D., & Winders, D. J. (2021). Accelerating Catastrophe: Slaughter Line Speeds and the Environment. *Environmental Law*, 51(4), 1277-1299. <https://www.jstor.org/stable/48647573?seq=1>.

⁷ Fedinick KP, Taylor S, Roberts M. (2019). Watered Down Justice. Natural Resources Defense Council, Coming Clean and Environmental Justice Health Alliance. Available from <https://www.nrdc.org/sites/default/files/watered-down-justice-report.pdf> Accessed April 3, 2019.

⁸ Exec. Order No. 14008. Tackling the Climate Crisis at Home and Abroad. 86 Fed. Reg. 7619. (January 27, 2021). <https://www.federalregister.gov/d/2021-02177>

⁹ Exec. Order No. 14008. Tackling the Climate Crisis at Home and Abroad. 86 Fed. Reg. 7619. (January 27, 2021). <https://www.federalregister.gov/d/2021-02177>

¹⁰ Notice of Request for Public Comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad. 86 FR 14403. (March 16, 2021). <https://www.federalregister.gov/d/2021-05287>

¹¹ Clark, M. A., Domingo, N. G., Colgan, K., Thakrar, S. K., Tilman, D., Lynch, J., ... & Hill, J. D. (2020). Global food system emissions could preclude achieving the 1.5 and 2 C climate change targets. *Science*, 370(6517), 705-708. <https://doi.org/10.1126/science.aba7357>

¹² Heller, M., Keoleian, G., & Rose, D. (2020). Implications of Future US Diet Scenarios on Greenhouse Gas Emissions. Center for Sustainable Systems Report, University of Michigan: Ann Arbor. <https://css.umich.edu/publication/implications-future-us-diet-scenarios-greenhouse-gas-emissions>

Recommendations encouraging widespread adoption of sustainable diets cannot wait. We urge HHS and USDA to commit to integrating sustainability into the development of the 2025-2030 DGA. If it will not be addressed through the DGAC, then we urge the Departments to announce a clearly defined, transparent process and timeline prior to the formation of the DGAC that will ensure sustainability is addressed in the 2025-2030 DGA.

Sincerely,

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American Academy of Pediatrics

American Public Health Association

Animal Legal Defense Fund

Balanced

Center for Biological Diversity

Center for Science in the Public Interest

Chef Ann Foundation

Coalition for Healthy School Food

Compassion in World Farming

Eat for the Earth

Factory Farming Awareness Coalition

Friends of the Earth

Hazon

Health Care Without Harm

Healthy Food America

Humane Society Legislative Fund

Humane Society of the United States

Johns Hopkins Center for a Livable Future

Laurie M. Tisch Center for Food, Education & Policy, Columbia University

National Association of Pediatric Nurse Practitioners

National Farm to School Network

National League for Nursing

National WIC Association

North Carolina Center for Health and Wellness

Physicians Against Red Meat (PhARM)

Physicians Committee for Responsible Medicine

Plant Based Foods Association

Plant Based Nutrition Movement

Plant Powered Metro New York

Plant-Based Advocates

ProVeg US

Redstone Global Center for Prevention and Wellness GWU

Science and Environmental Health Network

Society for Nutrition Education and Behavior

The Planetary Health Collective

The T. Colin Campbell Center for Nutrition Studies

Union of Concerned Scientists

WildAid

World Animal Protection US