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. 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, 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

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

In fact, the President’s Executive Order 14008 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 President and USDA 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. 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.

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.

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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