

May 16, 2022

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Office of the Assistant Secretary for Health (OASH)
Department of Health and Human Services
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Comments on Scientific Questions To Be Examined To Support the Development of the *Dietary Guidelines for Americans, 2025–2030* (87 FR 22540)

Dear Ms. de Jesus:

Thank you for the opportunity to provide input on the scientific questions to be examined to support the development of the next *Dietary Guidelines for Americans*. We appreciate the opportunity to have early input into the process and the commitment to development of the strongest and most relevant scientific questions for consideration.

Founded in 2016, the Plant Based Foods Association (PBFA) represents over 350 of the nation's leading plant-based food companies. Our members range from small start-ups to large, established companies and offer consumers a variety of plant-based options.

As the Department of Health and Human Services (HHS) and U.S. Department of Agriculture (USDA) begin the process for the *Dietary Guidelines for Americans, 2025-2030*, we encourage the inclusion of two key areas: sustainability and the benefits of plant-based diets. These topics are critical to the *Dietary Guidelines* process individually and are also intertwined.

Personal and planetary health are closely connected and mutually at risk. Shifting dietary patterns towards high-quality, plant-based diets could improve both. Compared with typical U.S. diets, healthy plant-based diets are more sustainable and are associated with lower risk of chronic diseases such as obesity, type 2 diabetes, cardiovascular disease, and some cancers (Hemler and Hu 2019).

Sustainability

PBFA is concerned that sustainability will not be examined by the 2025 Dietary Guidelines Advisory Committee. While we agree that sustainability and the complex relationship between nutrition and climate change is an important, cross-cutting, and high priority topic, we do not agree that it should be addressed separately from the *Dietary Guidelines* process. It is unclear how HHS and USDA will address sustainability and we request additional clarity about the process. If sustainability will not be part of the Committee's

review process, will HHS and USDA consider sustainability as part of the development of the *Dietary Guidelines* and supportive consumer education materials or is this indicative that sustainability will not be included in the next version of the *Dietary Guidelines*?

PBFA is committed to supporting the growing demand for healthy and sustainable foods. The *Dietary Guidelines* plays a pivotal role for many industries such as our plant-based food company partners and members. We believe the shift toward *Dietary Guidelines* that not only considers the betterment of the population but of the planet should be a priority for HHS and USDA.

In a global modelling analysis examining three sets of diet scenarios on nutrient levels, diet-related and weight-related chronic disease mortality, and environmental impacts for more than 150 countries, replacing animal-source foods with plant-based ones was particularly effective in high-income countries for improving nutrient levels, lowering premature mortality and reducing some environmental impacts, particularly greenhouse gas emissions (Springmann, Wiebe et al. 2018). A shift toward healthy and sustainable diets is recommended as a priority in all G20 countries, including the United States, where consumption of less healthy and less sustainably produced foods is high (Loken 2020).

Excluding sustainability from the Dietary Guidelines Advisory Committee review process omits an acknowledgement of the undeniable link between our planetary health and our food system. Separating sustainability from the *Dietary Guidelines* process also separates the intricate connectedness between sustainability and healthy diets. We urge you to reconsider excluding sustainability from the Dietary Guidelines Advisory Committee process.

Importance of Plant-Based Diets

As noted in the 2020-2025 *Dietary Guidelines*, “A fundamental premise of the *Dietary Guidelines* is that almost everyone, no matter an individual’s age, race, or ethnicity, or health status, can benefit from shifting food and beverage choices to better support healthy dietary patterns.” (USDA and HHS 2020)

Healthy dietary patterns are plant-based diets. The scientific questions included in **Dietary Patterns Across Life Stages** need to include plant-based diets as part of the dietary pattern analysis. While there are numerous definitions of plant-based diets, at its broadest sense, a plant-based diet is a diet built around a plate filled with mostly vegetables, fruits, whole grains, and beans. Recent editions of the *Dietary Guidelines for Americans* have been more inclusive of plant-based diets, with the Healthy Mediterranean-Style Dietary Pattern and the Healthy Vegetarian Dietary Pattern in the most recent edition. However, there remains a reliance and emphasis on animal-based foods and traditional U.S. eating patterns as part of the *Dietary Guidelines* dietary patterns recommendations. To appropriately reflect the broad range of dietary patterns that make up plant-based diets, we urge the dietary patterns scientific questions include:

- A flexitarian eating pattern that includes eggs, dairy foods, and occasionally meat, poultry, fish, and seafood.

- A vegetarian (sometimes referred to as lacto-ovo vegetarian) eating pattern that includes eggs and dairy foods, but no meat, poultry, fish, or seafood.
- A vegan eating pattern that includes no animal foods.

Plant-based foods have a unique role in healthy diets and dietary patterns, which optimize and improve health at all life stages. These diets are appropriate for all stages of the life cycle, including pregnancy, lactation, infancy, childhood, adolescence, and older adulthood (Melina, Craig et al. 2016). Research has consistently shown that plant-based foods can help people maintain a healthy weight, reduce the risk of diabetes, and protect against many forms of cancer and other diseases (Hemler and Hu 2019). People consuming a plant-based diet are at a reduced risk of many of the health conditions that are proposed for study in the scientific questions for the Dietary Guidelines Advisory Committee review.

While we recommend that plant-based dietary patterns be included in every question related to dietary patterns, we provide two examples to illustrate this proposal.

Example One – Dietary Patterns Across Life Stages

- Current Question -- What is the relationship between dietary patterns consumed and:
 - growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance?
 - risk of cardiovascular disease?
 - risk of type 2 diabetes?
 - risk of certain types of cancer (breast, colorectal, lung, prostate)?
 - risk of cognitive decline, mild cognitive impairment, dementia, and Alzheimer’s disease?
 - risk of sarcopenia?
 - bone health?
 - all-cause mortality?
- Recommended Revision (*Recommended changes in Italics*) -- What is the relationship between dietary patterns consumed (*including flexitarian, vegetarian, and vegan dietary patterns*) and:
 - growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance?
 - risk of cardiovascular disease (*including hypertension, elevated blood lipid levels, elevated triglycerides*)?
 - risk of type 2 diabetes?
 - risk of certain types of cancer (breast, colorectal, lung, prostate)?
 - risk of cognitive decline, mild cognitive impairment, dementia, and Alzheimer’s disease?
 - risk of sarcopenia?
 - bone health?
 - all-cause mortality?

Example Two – Food Pattern Modeling

- Current Question -- Considering each life stage, should changes be made to the USDA Dietary Patterns (Healthy U.S.-Style, Healthy Mediterranean-Style, and/or Healthy Vegetarian), and should additional Dietary Patterns be developed/proposed based on:
 - Findings from systematic reviews, data analysis, and/or food pattern modeling analyses
 - Population norms (e.g., starchy vegetables are often consumed interchangeably with grains), preferences (e.g., emphasis on one staple grain versus another), or needs (e.g., lactose intolerance) of the diverse individuals and cultural foodways within the U.S. population?
- Recommended Revision (*Recommended changes in Italics*) -- Considering each life stage, should changes be made to the USDA Dietary Patterns (Healthy U.S.-Style, Healthy Mediterranean-Style, and/or Healthy Vegetarian), and should additional Dietary Patterns be developed/proposed based on:
 - Findings from systematic reviews, data analysis, and/or food pattern modeling analyses (*including flexitarian diets*)
 - Population norms (e.g., starchy vegetables are often consumed interchangeably with grains), preferences (e.g., emphasis on one staple grain versus another *or desire to limit intake of animal products*), or needs (e.g., lactose intolerance) of the diverse individuals and cultural foodways within the U.S. population?

The *Dietary Guidelines* form the basis of all federal nutrition programs and activities. Lack of emphasis on plant-based diets results in fewer plant-based options in federal programs including in the National School Lunch Program and Supplemental Nutrition Program for Women, Infants and Children. Inclusion of plant-based food options in the *Dietary Guidelines* increases the demand and access to sustainable and healthful foods and meals for millions of Americans through federal and state-level food and nutrition programs.

The *Dietary Guidelines* should support and facilitate Americans' ability to make healthier food choices through public policies that reflect scientific evidence and the evolving food environment. To do so requires the inclusion of plant-based diets as part of the evidence review process.

In summary, HHS and USDA must not lose focus on promoting and recommending the most healthful, health-promoting, and sustainable foods and dietary patterns in the *Dietary Guidelines*. If we truly want a healthier society, then the guidelines that determine the federal nutrition policy and education initiatives must align with the evidence on sustainable and healthy dietary patterns.

Sincerely,



Nicole Negowetti
Vice President of Policy & Food Systems

References

Hemler, E. C. and F. B. Hu (2019). "Plant-Based Diets for Personal, Population, and Planetary Health." Adv Nutr **10**(Suppl_4): S275-s283.

Loken, B. (2020). Diets for a Better Future: Rebooting and Reimagining Healthy and Sustainable Food Systems in the G20. B. Ghormley, EAT: 39.

Melina, V., et al. (2016). "Position of the Academy of Nutrition and Dietetics: Vegetarian Diets." Journal of the Academy of Nutrition and Dietetics **116**(12): 1970-1980.

Springmann, M., et al. (2018). "Health and nutritional aspects of sustainable diet strategies and their association with environmental impacts: a global modelling analysis with country-level detail." Lancet Planet Health **2**(10): e451-e461.

USDA and HHS (2020). *Dietary Guidelines for Americans, 2020-2025*, U.S. Department of Agriculture and U.S. Department of Health and Human Services.