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Re: Federal Register # 2022-08043; Request for Comments on Scientific Questions to be Examined to Support the Development of the Dietary Guidelines for Americans, 2025-2030

Dear Assistant Secretary Levine and Ms. de Jesus,

Thank you for the opportunity to provide input into the formative process of the next edition of the Dietary Guidelines for Americans (DGA). We applaud the decisions of HHS and USDA to address the following elements:

- Focus on food-based strategies that can be used to help individuals implement the DGAs and prevent or manage overweight and obesity.
- Assess the role of ultra-processed foods (UPF) and relationship to growth, size, body composition, risk of overweight/obesity, weight loss, and maintenance.
- Application of a health equity lens to the scientific questions to ensure the DGAs are relevant to people with diverse racial, ethnic, socioeconomic, and cultural backgrounds.
- Examination of the relationships between:
    - Food sources of added sugars to overweight/obesity and type 2 diabetes, and saturated fat and cardiovascular disease.
    - Timing of eating (address diet trends such as intermittent fasting) and overweight/obesity and alignment with healthy dietary patterns.
    - "Specific food-based strategies" and overweight/obesity.
- Sustainability and the complex interrelationships between agriculture production, nutrition, and climate change.

In addition, to strengthen the process and achieve the critical goals of the DGA, we strongly urge HHS and USDA to take the following actions as they embark on these critical discussions (bibliographies are included at the end):

1. **Add to the current list of scientific questions to be reviewed by the DGAC** (see bibliography):

Refined Grains and Starches
What is the relationship between food sources of refined grains and starches consumed and: • *growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance?* • *risk of type 2 diabetes?* • *risk of cardiovascular diseases?*

Dairy Fat
What is the relationship between consumption of whole fat, reduced fat, and non-fat dairy foods – both separately and jointly considering milk, cheese, and yogurt – and: • *growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance?* • *risk of type 2 diabetes?* • *risk of cardiovascular diseases?*

2. **Establish a Clear Classification System for Ultra-Processed Foods (UPF)**

While we support HHS and USDA in addressing the relationship between consumption of dietary patterns with varying amounts of UPF and growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance for the next edition of the DGAs, we strongly encourage the agencies to work closely with FDA to first establish a clear taxonomy of processed and ultra-processed foods. A taxonomy of the spectrum of food processing, such as NOVA or EPIC, is essential before conducting systematic reviews, food pattern modeling, or data analyses. Food-based dietary guidance in Brazil and Canada currently address UPF.

In response to the increase in scientific studies that link the consumption of UPF with greater risk of diet-related non-communicable diseases, we recommend expanding the scientific question to include:

Ultra-Processed Foods
What is the relationship between consumption of dietary patterns with varying classifications and amounts of ultra-processed foods and: • *meeting recommended nutrient and food targets?* • *risk of type 2 diabetes?* • *risk of cardiovascular disease?* • *risk of certain types of cancer (breast, colorectal, lung, and prostate)?*

3. Address Sustainability, Climate-Smart Dietary Patterns, and National Nutrition Security as a Parallel Convergent Process

We also support the commitment to establish a parallel, yet separate, process for developing recommendations on how to achieve climate-smart dietary patterns that support household, community, and population nutrition security. There is a tremendous urgency for the U.S. to address the profound impacts of climate on the food supply and nutrition security and to advance strategic research and policy solutions that ensure:

- All individuals have consistent access, availability, and affordability of foods and beverages that promote well-being and prevent disease.
- Greater resilience of agricultural and food systems.
- Long-term capacity of natural resources (i.e., soil, water, energy, biodiversity) that supports a nutritious food supply.

As we have learned from current events - wildfires in the west, droughts in the Midwest, the global COVID-19 pandemic, and with the war in Ukraine - the U.S. needs a national strategy to ensure stability and resilience of domestic agriculture and food systems that support healthy dietary patterns, both now and in the future. This includes applying a systems approach to predicting how mitigation and adaptation measures to address climate change impact agriculture and food systems, their agility and resilience to chronic disruptions, and impact on access and consumption of foods that support healthy eating patterns.

Other countries such as Brazil, Canada, Denmark, France, Germany, Iceland, Sweden, and others have introduced environmental aspects into their food-based dietary guidance systems. The U.S. has an opportunity to lead the dialog, science, and policy recommendations on climate-smart dietary patterns and nutrition security. The time for having a robust, multidimensional national strategy that advances healthy dietary patterns, sustainable food systems, and adaptive climate change is now. These efforts would not only inform the 2025 and future editions of the DGAs but will inform food and nutrition assistance programs, chronic disease prevention efforts, energy and natural resource conservation, public health preparedness, and even national defense. The multifold gains will be significant steps toward establishing a state of nutrition security and resilience.

We recommend the following process for HHS and USDA to establish climate-smart dietary patterns that support national nutrition security:

1) Assemble an interdisciplinary team comprised of Federal staff from HHS, USDA, EPA, NOAA, USAID, Interior, DOD, and others to develop the process for developing research and policy recommendations on climate-smart dietary patterns to support national nutrition security. Three co-executive secretaries should be appointed. This intergovernmental team will:
   a) Develop a project management plan that aligns with the process designed by HHS and USDA to revise the DGAs (https://www.dietaryguidelines.gov/work-under-way/learn-about-process).

   i) The plan shall include a formal crosswalk between these concurrent efforts and in which the results of the climate-smart dietary patterns advisory committee are published and informs the work of the 2025 DGAC.
b) Determine the methods and protocol for conducting rigorous systematic reviews of the scientific literature, data and predictive analyses, and system modeling and identify the scientific team to oversee the multi-prong analyses.
c) Establish a charter for a Climate-Smart Dietary Patterns and National Nutrition Security Federal Advisory Committee (FAC).
d) Launch a website to serve as a repository of the work of the FAC.
e) Solicit nominations and appoint a FAC that includes individuals who are respected and have demonstrated research and scientific publication experience. This includes agronomists, horticulturalists and seed scientists; climatologist, ecologists, and environmental scientists; animal scientists, entomologists, and marine scientists; registered dietitian nutritionists, nutrition scientists, public health practitioners, and physicians; food scientists and microbiologists; environmental engineers; and health informatic analysts, data scientists, and systems modelers. The FAC would:
   i) Work collaboratively with the Federal advisory team to develop the scientific research questions which would be made available for public comment. These questions would encompass a health equity lens.
   ii) Review, deliberate, and summarize the scientific evidence, data, and models.
   iii) Submit a scientific report with research and policy recommendations to the coordinating Federal agencies and to the 2025 DGAC. The scientific report would be made available to the public for review and comment for a minimum of 90 days.

Thank you for this opportunity to provide comments to these critical issues. We look forward to the work of the 2025 Dietary Guidelines Advisory Committee and the next edition of the DGAs.

Sincerely,

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