

May 16, 2022

Janet M. de Jesus, MS, RD
Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary
Department of Health and Human Services
1101 Wootton Parkway, Suite 420
Rockville, Maryland 20852

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 Ms. De Jesus:

The undersigned organizations appreciate the opportunity to provide input to the Department of Health and Human Services (HHS) regarding the proposed scientific questions to be examined for the 2025-2030 Dietary Guidelines for Americans (DGA) process (Docket No. HHS-OASH-2022-0005-0001). Our groups participate in the Food and Beverage Issue Alliance (FBIA), a coalition of over 40 allied U.S.-based food and beverage trade associations representing various parts of the supply chain from farmers and agricultural processors, to packaged goods and retail.

Given the interest of the 2020-2025 Dietary Guidelines Advisory Committee (DGAC) for a question on ultra-processed foods in future DGA processes, we understand the interest to include this proposed question for the 2025-2030 process. However, we are concerned that in the absence of a consensus, science-based definition of “processed” or “ultra-processed,” with limited sufficient data of adequate quality, and if relevant expertise is not represented on the 2025-2030 DGAC, then evidence-based assessment for this proposed question could be hampered, resulting in recommendations that do not reflect the preponderance of scientific evidence. We are curious if, given the lack of a consensus scientific definition for “ultra-processed,” whether HHS and the U.S. Department of Agriculture (USDA) intend for the Committee to define the term, which we see as beyond the scope of the Committee. Furthermore, we are concerned of potential reliance on primarily epidemiological evidence due to the lack of significant randomized controlled trials (RCTs) and limited clinical trial data on “ultra-processed” foods and health outcomes, meaning that the DGAC would need to ensure that the consideration of epidemiological evidence is put into context.

Additionally, if the Committee is going to assess scientific evidence on “ultra-processed” foods, we strongly recommend that there also be consideration of nutrient density for “processed” foods. Many of these products are a source of critical nutrients often under-consumed by Americans (e.g., dietary fiber, potassium, vitamin D). Therefore, we encourage the DGAC to assess nutrient density of processed foods in context of the total diet in making recommendations on consumption of these products, and to consider this aspect when assessing the value of classification systems which gauge the healthfulness of products by level of processing, such as the NOVA system. Further, in the absence of an authoritative definition of nutrient density, we ask the DGAC to provide information on what science-based methods would be utilized to operationalize nutrient density in the context of recommended foods and beverages, including for those products which are fortified with critical nutrients, and which may have some added sugar, sodium, or saturated fat.

The undersigned submit that processed foods can be part of a broader solution to meet specific dietary needs, and these products are often under continuous improvement to meet consumer demands such as nutritional needs, shelf life, safety, functionality, and taste. Many processed foods also contain ingredients that can aid in improving nutritional profiles by reducing sodium (e.g., potassium chloride), fats, or added

sugars while increasing nutrients such as dietary fiber and essential fatty acids. Processing also contributes to the reduction of food waste, reduction of contaminants, reduction of allergens, and improvement of digestibility and bioavailability of nutrients. With regard to making any recommendation related to processed foods, the DGAC should recognize consumer behavior and the reasons why consumers may rely on processed foods, such as the need for convenience and palatability, which was pointed out by the 2020 DGAC. The DGAC should also consider any recommendation on processed foods through a nutrition equity lens given the utilization of these products among vulnerable populations due to their affordability, accessibility, quality, and safety.

Furthermore, as noted, the makeup of the DGAC could have a substantial impact on the consideration of the preponderance of scientific evidence on the role of “ultra-processed” foods in the diet and risk of various health outcomes. Therefore, we strongly recommend that there be at least one food scientist with robust understanding of how food is manufactured on the 2025-2030 DGAC if a question on “ultra-processed” foods is included. The need for appropriate expertise on the DGAC was noted by the National Academies of Sciences, Engineering, and Medicine (NASEM) to enhance the integrity of the DGAC, so we encourage HHS and USDA to ensure the right expertise if the Committee is going to review scientific evidence on processed foods. Further, during the analysis of scientific evidence, additional experts should also be brought in to meet with the Committee to address key aspects of food processing and manufacturing, including the importance of food processing, such as to ensure product safety and quality.

In addition to the proposed question on “ultra-processed” foods, HHS and USDA have included a proposed question on the timing of eating occasions. We are curious if further clarification can be provided on how snacking and meals relate to the timing of eating. Additionally, HHS and USDA proposed a question on the relationship between specific food-based strategies and weight outcomes (e.g., body composition). We are curious what is meant by “specific food-based strategies” and whether HHS and USDA can provide examples of what these strategies may be to the public prior to incorporation of this question into the 2025-2030 DGA process.

With regard to the DGAC, we are concerned with recent suggestions that any potential tie to the food and agriculture industry creates an overwhelming conflict for potential Committee members and therefore results in biased recommendations. We believe that those experts who are appointed to the DGAC can and will be objective in their review and assessment of the scientific evidence, and therefore should not be barred from participation on the DGAC if their expertise would be critical for the development of the DGA.

Finally, as there have been concerns with previous DGA processes regarding lack of transparency, we encourage HHS and USDA to be very transparent on the 2025-2030 process, including public notices as well as up-to-date information on the DGA website. The need for transparency was also reiterated by NASEM in their recommendations on the DGA process, so we encourage HHS and USDA to carry this forward for the 2025-2030 DGA.

We appreciate the opportunity to provide comments and would be pleased to address any questions.

Sincerely,
American Bakers Association
American Frozen Food Institute
Beer Institute
Calorie Control Council
Corn Refiners Association
Distilled Spirits Council of the U.S.
Institute of Shortening and Edible Oils

International Food Additives Council
Juice Products Association
National Confectioners Association
North American Meat Institute
North American Millers Association
SNAC International
Sugar Association
Wine Institute