



February 10, 2025

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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: Comments for 2025 Dietary Guidelines Advisory Committee (Docket No. OASH-2022-0017)

Dear Ms. De Jesus,

The Institute of Food Technologists (IFT) appreciate the opportunity to provide these comments on the Committee's work and progress to this point. IFT is a global organization of approximately 11,000 food scientists, technologists and related professionals committed to advancing the science of food and promoting a global food system that is equitable, sustainable, safe, and nutritious.

We commend the Dietary Guidelines Advisory Committee (DGAC) and the HHS and USDA staff for their diligent and thorough review of the scientific evidence for the development of the *Dietary Guidelines for Americans, 2025-2030*. Notably, we applaud the DGAC for integrating a lens of health equity throughout their deliberations and in the report, and for using all the tools available, such as diet simulations, to evaluate the nutritional adequacy of a wide variety of diets. This approach is essential for understanding the practicality and flexibility of the Dietary Guidelines across age groups and populations. As an organization of food scientists that utilize the DGA in the development of foods that feed our diverse US population, we offer the following comments to support HHS and USDA as they translate and disseminate these recommendations into the Dietary Guidelines for Americans 2025-2030.

We support the committee's findings regarding the limited evidence on dietary patterns with ultra-processed foods and their impact on growth, body composition, and the risk of obesity. The committee accurately highlighted the inconsistencies in definitions and the current limitations of dietary assessment methods in evaluating the type of processing applied to foods.

While this area is actively being researched and more findings are anticipated for future evaluation, we concur with the committee's conclusions on the current state of the science. We encourage HHS and USDA to heed the advice of the DGAC and await additional research before making further recommendations concerning the intake of ultra-processed foods. Recent studies indicate that some ultra-processed foods, such as whole grain breads, breakfast cereals, and yogurts, are associated with a reduced risk of chronic diseases, including cardiovascular disease, coronary heart disease, type 2 diabetes, and stroke¹. This indicates a need for a more nuanced approach to avoid restrictions on foods that could help people achieve a healthy diet.

We also encourage HHS and USDA to adopt a balanced approach when translating the DGAC recommendations to prioritize beans, peas, and lentils in the diet while reducing red and processed meats. While there are compelling reasons to include more plant-based foods, a balanced approach that acknowledges the benefits of lean red meat would best meet health and nutrition goals while respecting cultural food preferences. Increasing the intake of beans, peas, and lentils is an effective strategy for enhancing fiber intake and diversifying protein sources; however, lean red meats offer high-quality protein and bioavailable nutrients such as iron and B12 and can be part of a heart-healthy diet². We propose a “both-and” solution rather than an “either-or” one to enable individuals to gain the advantages of both food groups with maximum flexibility.

We endorse the committee’s overall recommendations encouraging nutrient-dense foods and beverages within calorie limits. Additionally, we support the heightened emphasis on whole grains but suggest considering the potential implications for consumers and other policies before transitioning grain recommendations from “at least half whole grain” to “mostly whole grain.” Given that most Americans currently do not consume enough whole grains, it is important to promote their inclusion in diets. However, most federal nutrition programs currently use the “half of grains as whole grain” as a standard for whole grain-rich foods. Meeting this standard has already required substantial reformulations of foods used in federal nutrition programs and the implications of a changing recommendation on this standard should be considered before going forward. Additionally, affordability and cultural food traditions should be considered so that whole grains are encouraged without increasing economic or cultural barriers.

¹ Mendoza, K., et al. "Ultra-processed foods and cardiovascular disease: analysis of three large US prospective cohorts and a systematic review and meta-analysis of prospective cohort studies." (2024) *The Lancet Regional Health–Americas* 37.

Chen Z, et al. Ultra-processed food consumption and risk of type 2 diabetes: three large prospective US cohort studies. (2023) *Diabetes Care* 46:1335-44

² Roussell, M. A., et al. "Beef in an Optimal Lean Diet study: effects on lipids, lipoproteins, and apolipoproteins." (2012) *Am J Clin Nutr* 95: 9-16.

Roussell, M. A., et al. "Effects of a DASH-like diet containing lean beef on vascular health." (2014) *J Hum Hypertens* 28: 600-605.

We were pleased to see an emphasis on parental feeding practices for children to foster healthy eating behaviors. The integration of behavioral research into the dietary guidelines review process is crucial to understanding the behaviors and barriers preventing individuals from making healthy dietary choices. We encourage the inclusion of behavioral scientific evidence into future advisory committees to improve the effectiveness of nutrition recommendations and health outcomes. We also recommend the inclusion of food science expertise in future committees to help understand the implications of changing recommendations on the food supply and the development of healthy foods in the market.

In conclusion, we extend our deep appreciation to the Dietary Guidelines Advisory Committee and federal staff for their exceptional work and commitment to developing the scientific report that underpins the Dietary Guidelines for Americans. We thank you for considering our comments. Please contact Anna Rosales, Senior Director Government Affairs and Nutrition (arosales@ift.org) if IFT may be of further assistance.

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