



Institute of Food Technologists
525 W. Van Buren Street., Suite 1000
Chicago, IL 60607-3830 USA

+1.312.782.8424
+1.312.782.8348 Fax
ift.org

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Dietary Guidelines Advisory Committee
Kristin Koegel
USDA Food and Nutrition Service
Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Submitted via electronic mail: www.regulations.gov

Re: Docket FNS-2019-0001-6698: Comments Relevant to the Development of the 2020-2025 Dietary Guidelines for Americans

Dear Dietary Guidelines Advisory Committee,

The Institute of Food Technologists (IFT) appreciates the opportunity to provide input on the 2020-2025 *Dietary Guidelines for Americans*. IFT is a global organization of nearly 16,000 individual members from more than 100 countries committed to advancing the science of food. Since 1939, IFT has brought together the brightest minds in food science, technology and related professions from academia, government, and industry to solve the world's greatest food challenges. Our organization works to ensure that our members have the resources they need to learn, grow, and advance the science of food as the population and the world evolve. We believe that science is essential to ensuring a global food supply that is sustainable, safe, nutritious, and accessible to all.

IFT believes that the *Dietary Guidelines for Americans* (DGAs) should help maintain or improve nutrition, health, and food safety, while fostering behavioral change through clear, practical, affordable, and science-based recommendations. While the guidelines need to be aspirational, IFT has consistently emphasized the need for practical and realistic dietary guidelines that enable sustainable implementation while maximizing adoption by all Americans, particularly those with limited resources (e.g., income and time) (*Institute of Food Technologists, 2019; United States Department of Agriculture and Department of Health and Human Services, 2020*). Recommending dietary changes that are not achievable by most consumers neither improves nutrition and health nor serves the public.

Disparities in the diet due to numerous factors, including income, education, geographic location, race, and ethnicity, impact the risk and prevalence of diet-related chronic diseases, such as cardiovascular disease, obesity, and diabetes (Bell et al., 2019; Cano-Ibáñez et al., 2019; Cooksey-Stowers et al., 2017; Darmon & Drewnowski, 2015; Dutko et al., 2012; Kris-Etherton et al., 2020). Further, underlying health condition(s) and chronic disease(s) in individuals, particularly among individuals in lower socio-economic strata and/or from minority racial and ethnic groups, increases susceptibility to and exacerbates health conditions/diseases, as exemplified by the COVID-19 crisis (*Centers for Disease Control and Prevention,*

2020; Sassos, 2020). In the U.S., economic downturn and job loss due to COVID-19 has escalated food insecurity, further straining vulnerable populations. Many middle-class families are experiencing elements of food insecurity and enrolling in supplemental nutrition programs for the first time (TuftsNow, 2020). Compared to 2018, in April 2020, US food insecurity doubled in households and rose to over 40% from 15% among mothers with children under the age of 12 years (Bauer, 2020).

Evolving disparities in diet, mounting healthcare costs associated with preventable diet-related chronic diseases, and increasing susceptibility to unforeseen phenomena such as COVID-19 reveal the importance of practical and realistic dietary guidelines to build resiliency and help improve health outcomes. The association between the risk of greater severity of COVID-19 infection with diet-related health conditions, such as obesity, type 2 diabetes, coronary heart disease, and poor status of certain nutrients (for example, iron, zinc, and vitamin D) which are important for immune function (Calder et al., 2020; Maggini et al., 2018), emphasize the need for dietary guidelines to be practical and translatable into healthy dietary patterns, that consumers can adopt to attain and/or maintain optimal nutritional status. The COVID-19 crisis shows the importance of food processing and preservation due to an increased need for shelf stable foods to help consumers follow healthy dietary pattern(s), during a time of shelter-in-place, economic strains, and time and other resource constraints.

During the public meeting, DGAC members recognized the need to consider other factors, such as taste, food insecurity, socio-economic status, and health (*United States Department of Agriculture and Department of Health and Human Services, 2020*) that drive consumer purchasing and consumption behavior and adoption of the guidelines. However, none of these factors were discussed at length because the DGAC was not charged with evaluating the impact of these factors on the adoption of the guidelines. Additionally, requisite experts, such as food scientists and technologists, social scientists, and behavioral scientists are not adequately represented on the DGAC.

The DGAC members recognized that “... it’s very important that we meet people where they are in terms of recommendations,” and we give them tools and strategies for success (*United States Department of Agriculture and Department of Health and Human Services, 2020*). IFT strongly believes that the recommendations should integrate the pursuit of nutrition aims with the practicalities of life. It is therefore important to understand and assess the role of factors such as socio-economic status, food insecurity, taste, time, education, and cooking skills in developing recommendations to help Americans meet their diverse dietary needs, in addition to evaluating the science on the health effects of foods, nutrients, and dietary patterns. As the DGAC is formulating recommendations on research gaps and topics for the 2025 DGAs, IFT urges the Committee to recommend to the USDA and DHHS that the following topic/question be addressed by the 2025 DGAC. This topic/question was proposed in IFT’s input to USDA’s call for comments on “Topics and Questions,” for 2020 DGAs, in 2018 (*Institute of Food Technologists, 2018*).

Topic: Importance of food science and technology to the food supply

Question: What is the role of food science and technology in providing a safe, nutritious, and affordable food supply, to help Americans meet the dietary recommendations during all life stages?

Food scientists and technologists working with experts in nutrition and other disciplines can help provide acceptable solutions to concerns, such as socio-economic status, taste, and education, raised by members of the 2020 DGAC. These professionals would bring in expertise and understanding of the technological capabilities and limitations of the existing food supply chain and food manufacturing on matters of food safety, preservation, and shelf-life; sensory appeal of the food; cost and time

constraints; and consumer acceptability. This is critical in the development of recommendations, guidelines, and implementation strategies that are workable. Only if recommendations are both practical and realistic, will they result in consumer adoption, across all life stages and cohorts. Acceptance of such recommendations both motivates and incentivizes food scientists and technologists to continue their efforts to innovate and reformulate food products to meet both nutritional and value-based consumer needs. Additionally, knowledge about the available diverse food choices and potential benefits and challenges of incorporating these food products in national and local public food assistance programs and services may help increase access to more healthful foods for program recipients. Application of food science and technology can help provide safe, nutritious, accessible, palatable, and affordable food products to assist consumers in meeting their nutrient and dietary requirements, while also addressing various cultural preferences, health needs, and resource constraints. Nearly all available food products in the marketplace have been developed or made safer through the application of food science and technology.

IFT appreciates the opportunity to provide comments on 2020-2025 DGAs. IFT and its members are committed to assisting with the development of the dietary guidelines, and we believe our scientific and technological capabilities will help in developing evidence-based dietary recommendations. Food scientists and technologists share a commitment to develop healthy food products, key to successfully implementing the DGAs. We thank you in advance for your consideration of our comments. Please contact Farida Mohamedshah, Director, Nutrition Science, Food Laws and Regulations (fmohamedshah@ift.org; 202-330-4986), if IFT may provide further assistance.

Sincerely,



Pam Coleman, MBA, CFS
IFT President, 2019-2020



Christie Tarantino-Dean, FASAE, CAE
IFT, Chief Executive Officer

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