UNIVERSITY OF CALIFORNIA
Agriculture and Natural Resources

February 6, 2025

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: Docket HHS-OASH-2022-0021, 2025 Dietary Guidelines for Americans Committee

Dear Ms. de Jesus,

I, Lorrene Ritchie, appreciate this opportunity to provide public comment on behalf of the University of California Nutrition Policy Institute (NPI) as you work to develop the 2025-2030 *Dietary Guidelines for Americans* and associated public-facing informational materials.

NPI researchers conduct and translate policy-relevant research aimed at reshaping public environments to be more healthful for all children, families, and communities. NPI strongly supports the following evidence-based recommendations of the 2025 Dietary Guidelines Advisory Committee[1] and urges you to adopt them without reservation in the new *Dietary Guidelines*:

- A dietary pattern that is higher in vegetables, fruits, nuts, legumes, whole grains, fish and seafood, unsaturated vegetable oils, low or non-fat dairy, and lower in red and processed meats, sugar-sweetened foods and beverages, refined grains, and saturated fat is associated with numerous health benefits and can be modified to meet individual cultural, religious dietary, and budget needs and preferences. Within this healthy dietary pattern:
    - Water should be recommended as the primary beverage to optimize health.
    - Saturated fat and added sugars should be limited to less than 10% of calories for Americans aged 2 and older.
- Policy, systems, and environmental strategies are needed to support Americans' ability to follow the *Dietary Guidelines*. Recommendations to the food industry and food

[1] 2025 Dietary Guidelines Advisory Committee. 2024. *Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture*. U.S. Department of Health and Human Services. https://doi.org/10.52570/DGAC2025.

retailers on how to make a healthy diet more accessible for all Americans—like reducing sodium, saturated fat, and added sugars in the food supply— should be included.

Though the Committee did not consider sustainability, several of their recommendations would have a positive impact for planetary health as well as public health. We urge you to promote environmentally sustainable diets in the 2025-2030 *Dietary Guidelines* to the greatest extent possible.

Overall, we support the evidence-based recommendations of the 2025 Dietary Guidelines Advisory Committee (DGAC) and urge the U.S. Departments of Agriculture and Health and Human Services (the Departments) to integrate them in their current form into the 2025-2030 *Dietary Guidelines for Americans* (DGA).

Herewith, we provide more detailed input for your consideration.

Dietary Pattern

We support the DGAC's description of a healthy dietary pattern, which builds on previous DGA editions by increasing emphasis on whole grains and prioritizing legumes, nuts, fish, and seafood as protein sources, while recommending a reduction in red and processed meat consumption. We urge the Departments to include these recommendations in the DGAs.

- "As the Committee considered the evidence, which encompassed multiple life stages, a dietary pattern emerged that was consistently related to beneficial health. This healthy dietary pattern for individuals ages 2 years and older is higher in vegetables, fruits, legumes (i.e., beans, peas, lentils), nuts, whole grains, fish/seafood, and vegetable oils higher in unsaturated fat, and lower in red and processed meats, s-sweetened foods and beverages, refined grains, and saturated fat. Some of these healthy dietary patterns also include consumption of fat-free or low-fat dairy and foods lower in sodium, and/or may include plant-based dietary options." (Executive Summary, p. 4)

We support the DGAC's recommendations that the DGAs should "increase emphasis on Whole Grains, provide clear definitions and/or examples of Whole Grains, recommend that Grains are "mostly Whole Grains" instead of "at least half Whole Grains, and support exploring fortification/enrichment of Whole Grains" (Part E, Ch. 1, p. 15).

We support the DGAC's recommendation to maintain the 2020-2025 DGA limits on added sugars, saturated fat, and sodium in the 2025-2030 DGA and urge the Departments to maintain these limits (Part E, Ch. 1, p. 18; with the 2020 limits listed on p. 17):

- Added sugars: less than 10% of calories per day starting at age 2. Avoid added sugars in foods and beverages before age 2.
- Saturated Fat: less than 10% of calories per day starting at age 2.

The quantitative daily limits on saturated fat and added sugars calories must be clearly communicated in the final 2025-2030 DGA. UC NPI wants to ensure that the quantitative added sugars and saturated fat limits are retained in the 2025 DGA.

- For context, the 2025 DGAC has proposed eliminating the specific quantities of "remaining daily calories for other uses" in presentations of all dietary patterns. This proposed change should not affect the quantitative daily limits for added sugars and saturated fat calories but will affect how these calories are accounted for and presented in a healthy dietary pattern. This could potentially affect the advice given to individuals on how to consume a dietary pattern that stays within total calorie limits while including some number of calories from added sugars and saturated fats. We primarily want to ensure that the quantitative added sugars and saturated fat limits are retained in the 2025 DGA.
- **The 2025 DGAC has proposed to remove the amount of "calories for other uses" altogether** because in the updated food pattern modeling (FPM) analyses, they found that the nutrient-dense foods and beverages modeled in the healthy dietary patterns contributed to higher or lower calories depending on which foods were selected, and i**n some cases there were no remaining calories available after all nutrient-dense foods were accounted for.** The 2025 DGAC concluded that, "With the inherent variability in the calories of nutrient-dense foods and beverages and the current dietary intake patterns in the United States, presenting a quantified number of additional calories was not considered prudent and may be misleading in that calories for other uses may not be available" (Part D, Chapter 10, p. 36). "Therefore, the Committee decided not to portray any calories (i.e. energy) that might be left for other uses, because on a given day, achieving the modified 2020 HUSS may account for all calories" (Part D, Chapter 10, p. 40).

We urge the Departments to clearly illustrate how healthy dietary patterns can be adapted for different cultures, dietary preferences, and budgets. The newly proposed dietary pattern enhances flexibility and inclusion and can increase uptake of the DGA's guidance as long as these flexibilities are clearly communicated.

Beverages

Water

We support the DGAC's recommendation that water should be the primary beverage in a healthy dietary pattern and, if other beverages are consumed, individuals should select options that are low in saturated fat and added sugars, such as unsweetened low-fat dairy milk and unsweetened fortified soy alternatives. (Part D, Chapter 3, p. 17)

We recommend that advice to drink water as the primary beverage should be clearly communicated in the final DGAs and that this should be accompanied by visuals emphasizing water as the primary beverage choice in MyPlate and other nutrition guidance. In its Report to Congress, the National Clinical Care Commission states, "USDA should add a symbol for drinking water to the MyPlate graphic and increase water promotion messaging in all consumer-facing materials issued by its Center for Nutrition Policy Promotion. Water is not currently depicted on the USDA MyPlate."[2]

We support the inclusion of the DGAC's recommendation to use clear language to "limit," rather than "reduce," consumption of beverages containing added sugars, given their association with unfavorable body composition and higher risk of obesity in childhood and adulthood (Part D, Chapter 3, p. 18).

Milk

We support the DGAC's recommendation that "milk consumption should be specified as unsweetened fat-free and low-fat dairy milk and unsweetened fortified soy beverages" given the strength of the evidence supporting limits on saturated fat intake, including among school-aged children (Part D, Ch. 3, p. 17)

Low- and no-calorie sweeteners in beverages (LNCSB)

We support the DGAC's recommendation that "given continuing questions and uncertainty about the long-term effectiveness of LNCSB for weight management, emphasis should be on consumption of water and nutrient-dense beverages. This is particularly important for children." (Part D, Ch. 3, p. 18).

Sustainability

We encourage the Departments to consider the findings of the sustainability reviews being done through the NIH ADVANTAGE study[3] and the federal Examining a Process Framework for Considering Sustainability in Dietary Guidelines Workgroup, which are focused on evaluating the evidence and policy implications of the interconnected issues of climate change, dietary patterns, and the food system. **We urge the Departments to finalize and publish the work of the Federal Workgroup in a timely manner to ensure transparency and utility for nutrition guidance.**

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[2] National Clinical Care Commission. (2022). *Report to Congress on leveraging federal programs to prevent and control diabetes and its complications, 2021: Chapter 4. Population-level diabetes prevention and control*. U.S. Department of Health and Human Services. https://health.gov/about-odphp/committees-workgroups/national-clinical-care-commission/report-congress

[3] National Institute of Child Health and Human Development. (n.d.). *Advancing understanding of health disparities: The ADVANTAGE initiative*. Retrieved January 28, 2025, from https://www.nichd.nih.gov/research/supported/advantage

- The US has set a target to reduce greenhouse gas emissions by 50-52% by 2030 as compared to 2005 levels[4]. It is critical and urgent that food production and consumption, as recommended by the DGAs, supports this goal over the next five years and beyond. **The Departments must ensure this timely and impactful nutrition guidance promotes planetary health as well as human health, as the two are inextricably linked.**

While the DGAC's recommendations were aimed at meeting nutrient needs, promoting health, and preventing chronic disease, several of them coincide with a more sustainable dietary pattern. For example, the DGAC recommends water as the primary beverage. Water in any form, but particularly tap water, has a smaller environmental footprint than do SSBs.[5,6]

Policy, Systems, and Environment

We urge the Departments to include a section in the DGAs on the importance of policy, systems, and environmental factors in shaping our ability to consume a healthy diet. This can build on "Chapter 3: Everyone Has a Role in Supporting Healthy Eating Patterns" (pp. 64-72) and the "Strategies for Action" (p. 68) in the 2015-2020 DGA, which acknowledged needed policy and food environment changes. Given the chronic disease epidemic in our country, it is critical for those who shape the food environment, such as food producers, food retail, and food service establishments, to play a role in making healthy diets more accessible.[7] As stated by the DGAC, "Creating a healthier food environment may lead to better dietary intakes and nutrition-related health outcomes" (Part D, Ch.1, p. 57).

The 2025 DGAC recommended identifying policy, systems, and environmental strategies for implementing the DGA as a future research need, but there is already ample evidence on the needed changes to the food supply and policy environment, and these should be acknowledged in the DGAs.

- For example, the DGAC cited a NASEM study[8] that included community and state-level interventions to support optimal development in early life, such as "expanding state Medicaid and Children's Health Insurance Program coverage of counseling

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[4] Biden, J. R. (2021) Proclamation 10186—Earth Day. In: Peters, G., Woolley, J. T., eds. *The American Presidency Project.* Retrieved January 28, 2025. https://www.presidency.ucsb.edu/node/349652

[5] Meisterling, K., et al. (2022). Healthy beverage initiatives: A case study of scenarios for optimizing their environmental benefits on a university campus. *Cleaner and Responsible Consumption, 4*, 100049. https://doi.org/[DOI if available]

[6] Patel AI, et al. 2020. Drinking water in the United States: Implications of water safety, access, and consumption. *Annual Review of Nutrition.* 40:345-373.

[7] Committee on Accelerating Progress in Obesity Prevention; Food and Nutrition Board; Institute of Medicine. 2012. *Accelerating Progress in Obesity Prevention: Solving the Weight of the Nation.* Glickman D, Parker L, Sim LJ, Del Valle Cook H, Miller EA, eds. National Academies Press (US); PMID: 24830053.

[8] National Academies of Sciences, Engineering, and Medicine, Health and Medicine Division. 2023. *Complementary Feeding Interventions for Infants and Young Children Under Age 2: Scoping of Promising Interventions to Implement at the Community or State Level.* (K. M. Delaney & D. A. Savitz, Eds.) National Academies Press. All rights reserved; 2023.

interventions by registered dietitians" and expanding nutrition education across income levels in the Special Supplemental Nutrition Program for Women, Infants, and Children (Part D, Ch. 5, p. 21).

- **We urge the Departments to consider existing reviews of research on policy, systems, and environmental barriers to a healthy diet and include recommendations for systems-level interventions in the final DGAs.** Any policy interventions discussed in the DGAs should be evidence-based.

We support the DGAC's call to further reduce sodium in the food supply by asking the food industry to follow the Food and Drug Administration's draft Phase II voluntary sodium reduction targets. Sodium reduction is critically important for health but is largely out of consumers' control: most sodium in the American diet comes from packaged and prepared foods. The DGAC's Food Pattern Modeling results demonstrate that it is nearly impossible for an individual to eat a diet aligned with recommended sodium limits (Part E, Ch. 1, pp. 17-18). **Therefore, action is necessary to push the food industry to reduce sodium in their products** (Part D, Ch. 11, p. 21).

Other Recommendations for the Departments & Future Research (Including Ultra-Processed Foods)

We support the DGAC's calls for future research, including more funding for NHANES development and more diverse research samples. And we urge the Departments to pursue funding and resources for the research needs identified by the DGAC.

- The limitations in the evidence base related to ultra-processed foods identified in the DGAC report (e.g., inconsistent definitions of ultra-processed foods, inability of certain dietary assessment methods to accurately capture ultra-processed food consumption) should provide more impetus for funding to support high-quality research into the impacts of these foods. In the meantime, the committee is already recommending to limit consumption of many foods considered ultra-processed that have strong evidence of harm, including processed meat and products high in added sugars, saturated fat, and sodium (Part D, Ch. 2, p. 26).

Given ongoing research in this area, **we support the DGAC's recommendation that future Committees re-examine the association of ultra-processed foods with growth, body composition, and risk of obesity and examine associations with other health outcomes, such as type 2 diabetes mellitus, cardiovascular disease, cancer, and cognitive decline** (Part D, Ch. 2, p. 26).

A minimum proportion of beans, peas, lentils and plant-based protein sources should be included in federal program nutrition standards.

- Alterations to the National School Lunch Program Meal Pattern will be needed to align with recommendations to increase plant-based protein intake if the proposed dietary pattern is adopted. Specifically, the current meal pattern includes beans, peas, and lentils as a subgroup requirement nested under Vegetables, and this subgroup may need to be moved to nest under Protein foods, without decreasing the total amount of vegetables in school lunches.

Transparency

We urge the Departments to be transparent in their decision-making as they translate the DGAC's Scientific Report to the final *Dietary Guidelines.* We urge the Departments not to omit any of the DGAC's recommendations. If there are any omissions or significant changes, the Departments should publicly disclose a clear explanation of their reasoning, as recommended by NASEM.[9]

Thank you for this opportunity to provide public comment as you develop the 2025-2030 *Dietary Guidelines for Americans* and consider ancillary consumer-facing products.

Sincerely,

Lorrene D. Ritchie, PhD, RD
Director, UC Nutrition Policy Institute
Cooperative Extension Nutrition Specialist, UC Agriculture and Natural Resources

[9] National Academies of Sciences, Engineering, and Medicine. 2023. *Evaluating the Process to Develop the Dietary Guidelines for Americans, 2020-2025: Final Report*. Washington, DC: The National Academies Press. https://doi.org/10.17226/26653.