

August 11, 2020

Eve Stoody, PhD  
Designated Federal Officer  
Center for Nutrition Policy and Promotion  
Food and Nutrition Service  
United States Department of Agriculture  
1320 Braddock Place  
Alexandria, VA 22314

Dear Dr. Eve Stoody and other federal officials tasked with updating the *Dietary Guidelines for Americans*,

The Society for Nutrition Education and Behavior (SNEB) thanks the appointed 20 nationally recognized experts for their service on the 2020 Dietary Guidelines Advisory Committee (DGAC) and the work of the federal staff that supports this critical component of reviewing the scientific evidence that underpins the latest edition of the *Dietary Guidelines for Americans* (DGA). We appreciate the invitation to provide oral and written comments on the *Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Agriculture and the Secretary of Health and Human Services*.

SNEB represents the interests of more than 1,100 nutrition educators worldwide. We are dedicated to promoting effective food and nutrition education and healthy behaviors through research, policy, and practice that promote equity and support public and planetary health. Collectively, SNEB members have unique and valuable expertise in building healthy communities and food systems, and achieving behaviors consistent with healthy lifestyles. Every day, our members use the DGA in multiple sectors and settings and in a variety of ways.

We have nine comments for your consideration as you move forward in translating the evidence reviews into actionable strategies for policy makers and practitioners to help *all* Americans to eat healthier. A number of our recommendations are consistent with the Center for Science in the Public Interest (CSPI) and many other members of the National Alliance for Nutrition and Activity (NANA).

### 1) Increase transparency in developing the 2020-2025 DGA

**Relevant National Academies of Science, Engineering, and Medicine Recommendation**

**(NASEM):** Provide a clear explanation when the 2020-2025 DGA omit or accept only parts of the conclusions from the 2020 DGAC scientific report.

**SNEB Comment:** We encourage the federal officials to adopt without reservation the recommendations put forth by the 2020 DGAC. If a compelling reason exists to omit or accept only part of a conclusion or recommendation, the DGA should be transparent and explain this rationale in full.

## 2) Strengthen guidance around improving dietary patterns across the lifespan

**Relevant 2020 DGAC Recommendation:** Evidence continues to grow supporting a dietary pattern that is higher in vegetables, fruits, nuts, legumes, whole grains, seafood, low and non-fat dairy foods, and unsaturated vegetable oils, while being lower in red and processed meats, saturated fatty acids and cholesterol, and beverages and foods with added sugars.

**SNEB Comment:** Using a socio-ecological framework, we encourage the 2020-2025 DGA to discuss the importance of healthful dietary patterns across the lifespan and providing more explicit advice regarding limiting red and processed meat.

## 3) Maximize this new opportunity to provide guidance to women who are pregnant and/or lactating and infants and toddlers through 24 months

### **Relevant 2020 DGAC Recommendations:**

- Encourage women before and during pregnancy and while lactating to choose dietary patterns that are higher in vegetables, fruits, whole grains, nuts, legumes, seafood, and vegetable oils, and lower in added sugars, refined grains, and red and processed meats.
- Encourage women of reproductive age, women who are pregnant, and women who are breastfeeding to consume 8 to 12 ounces of a variety of seafood per week from choices that are lower in methylmercury and higher in omega-3 fatty acids.
- Folic acid supplementation should be the standard of care before and during pregnancy.
- Encourage exclusive breastfeeding, ideally for the first 6 months of life, with continued breastfeeding through the first year of life or longer as desired by the mother and infant.
- Encourage the broader implementation of policies and programs that promote, protect, and support breastfeeding to benefit both the health of the mother and the infant.
- Complementary foods and beverages should not be introduced to infants before 4 months of age.
- Nutrient-dense complementary foods from all food groups, including meats, eggs, fish, fruits, vegetables, dairy, and whole grains, should be introduced in the second six months of life.
- For infants fed human milk at ages 6 to 12 months, consider providing iron-fortified infant cereals or similar products to ensure adequate iron intake.
- Introduce peanut products between ages 6 and 12 months.
- Children avoid foods and beverages with added sugars during the first 2 years of life.

### **SNEB Comments:** The 2020-2025 DGA should:

- Encourage healthful dietary patterns for women before and during their pregnancy and ensure consistency in these messages with the WIC Food Package, among other WIC educational and counseling materials.
- Adopt the advice of the CDC, the NASEM, the US Preventive Services Task Force, and the US Public Health Service that all women of childbearing age should consume 400 mcg of folic acid a day—from fortified foods or a supplement—even if they are not planning a pregnancy.

- Work with FDA and EPA, among other federal officials, to provide more guidance regarding which fish are lower in methylmercury and higher in omega-3 fatty acids.
- Provide guidance on how to breastfeed, as well as appropriate infant formula usage. These guidelines should discuss the importance of support systems needed to increase the initiation and duration of breastfeeding in this country including but not limited to: Encourage government, non-government, and industry develop more innovative approaches to increase access to paid family leave to support mothers in establishing and maintaining breastfeeding, including childcare subsidies; Increase access to federal programs that promote and support breastfeeding, including CDC's Hospitals Promoting Breastfeeding Program and WIC's breastfeeding peer counselor program; and Protect access to supports like breast pumps and breastfeeding counseling provided by the Affordable Care Act.
- Recommend nutrient-dense complementary foods and beverages be introduced when the infant is developmentally ready, sometime after four months of age; ideally introduction of complementary foods and beverages will coincide with about six months of exclusive human milk feeding and should not occur later than seven months of age.
- Recommend safe limits on infant consumption of rice and encourage caregivers to offer iron-fortified cereal grains like oatmeal, barley, and mixtures of whole grains, as recommended by the American Academy of Pediatrics (AAP) and the FDA, among others.
- Recommend caregivers introduce peanut products between ages 6 to 12 months, in accordance with National Institute of Allergy and Infectious Diseases guidelines.
- Recommend children avoid foods and beverages with added sugars during the first 2 years of life, explicitly addressing flavored milks and "toddler milks."
- Provide guidance on the following recommendations put forth in the Healthy Eating Research Infant Guidelines, among other health professional organizations such as AAP: Infants younger than one year of age should not consume cow's milk and/or plant-based milk alternatives; 100 percent fruit juices should not be introduced into the diet before 12 months of age and should be limited to no more than four ounces per day in toddlers one to three years of age. Any juice should be 100 percent fruit juice; Complementary foods with added salt, whether homemade or commercially prepared, should be avoided in the first year of life and limited thereafter to prevent children from developing preferences for salty foods; and children aged birth to five years of age should avoid beverages with no- or low-calorie sweeteners and beverages with caffeine.

**4) Increase consistency in 2020-2025 DGA with other public health authorities for individuals aged 2 years and older**

**Relevant 2020 DGAC Recommendations:**

- Reduce added sugars to less than 6 percent of calories;
- Reduce saturated fats to less than 10 percent of calories and to replace saturated fats with unsaturated fats, especially polyunsaturated fats; and
- Limit intake to 1 drink a day on days when alcohol is consumed for both men and women who drink and non-drinkers should not start drinking in order to improve their health.

**Relevant NASEM Recommendation:**

- Limit daily sodium intake across the lifespan. The new Chronic Disease Risk Reduction (CDRR) intake for sodium reinforces the current DGA limit of 2,300 mg per day for Americans aged 14 and above, with lower limits of 1,200 – 1,800 mg per day for younger children.

**SNEB Comments:**

- We support the 2020 DGAC and NASEM sodium recommendations and believe the 2020-2025 DGA should adopt without reservation these four recommendations. These recommendations play an invaluable role in strengthening the public health impacts of the nutrition standards and messages used by our federal nutrition assistance programs and should be reconfirmed in the 2020-2025 DGA.
- We support the emphasis on healthy fats including the elimination of *trans* fats.
- We support the emphasis on reducing added sugars.
- We encourage more coordinated work between the DGA team and the FDA Nutrition Facts Labeling staff to help maximize synergies on reduce added sugars, sodium, and *trans* fat in our food supply.

**5) Address the important role of safe drinking water for all**

**Relevant 2020 DGAC Recommendations:** Water is mentioned 140 times in the 2020 DGAC report.

**SNEB Comments:** We recommend the 2020-2025 DGAs consider relevant messages to health professionals and the public specific to drinking water, particularly those directed to the new, targeted populations –women who are pregnant and/or lactating and infants 0 to 24 month of age. These messages should also address the availability and safety of potable water, including work with the EPA among other tribal, state and local public health agencies; revisit the examination of a DRI for water with NASEM; modelling to forecast how climate will change surface and ground water availability; recognize the water requirements within our federal nutrition assistance programs (e.g., NSLP and CACFP), among other considerations.

**6) Strengthen the process for establishing the next editions of the DGA**

**Relevant 2020 DGAC Recommendations:**

- Investigate a process to identify topics that can be carried forward into future cycles of the Dietary Guidelines without additional review by the Advisory Committee;
- Continue reviewing the scientific evidence on nutrition and health on an ongoing basis and conduct systematic reviews and consider meta-analysis for appropriate questions on a continuous process, including between Committees;
- Conduct research to implement systems approaches into the Dietary Guidelines process;
- Develop a systematic approach to examine dietary drivers of overweight and obesity across the lifespan;
- Consider the role of the gut microbiome in future guidelines;
- Examine the relationship between nutrition and the immune function; and
- Consider the role of genetics and epigenetics in future guidelines.

**SNEB Comments**

- We encourage the federal staff to develop and disseminate (as appropriate) reflections on the process used for developing this edition of the DGAC Report. These reflections should discuss major changes made to this edition including but not limited to: the selection of topics, the use of only United States Department of Agriculture (USDA) Nutrition Evidence Systematic Review-generated literature reviews, the increased size of the Committee, and the Congressional mandate to include women who are pregnant and/or lactating and infants 0 to 24 months of age.
- While we do not believe another NASEM review is necessary at this time, we believe the 2020-2025 DGA should provide a transparent reflection on lessons learned and any gaps remaining regarding its effort to respond to the two 2017 [NASEM reports](#). These reports identified specific opportunities for strengthening the DGA process including: selecting members with diverse viewpoints, limiting bias during the review process, providing more consistent interpretation of purpose and target audiences, increasing transparency – including during this critical step of translating the evidence review to the national guidelines, and using more rigorous methodological approaches to the evaluation of the evidence. [USDA-HHS publicly responded](#) to the NASEM recommendations in September 2018 and we believe a similar approach could be useful as part of the 2020-2025 DGA or in a separate memo – shared with the public. These reflections should discuss the implications of the [new CNPP infrastructure](#) within the USDA Food and Nutrition Service versus a separate Center in the USDA Food, Nutrition, and Consumer Services mission area.

**7) Strengthen the Federal Government nutrition research agenda to address research needs for establishing the *Dietary Guidelines for Americans***

**Relevant 2020 DGAC Recommendations:**

- Address essential federal data needs such as expanding diversity and sample size of underreported populations such as women who are pregnant or lactating and infants and children younger than 24 months, as well as those underrepresented populations such as Native Americans, Pacific Islanders, and Native Hawaiians.
- Address essential national surveillance systems incorporate survey questions that query participants on food and beverage intake including frequency in the context of socioeconomic status, food security status, cultural food traditions, and religious or ethnic food “rule.”
- Work to secure the support of the NASEM to update existing Dietary Reference Intakes (DRIs) for several nutrients for all age-sex groups and life-stages to better characterize potential risk for dietary inadequacy and excess. This included a recommendation specific to updating and strengthening the DRI values for infants and children younger than 24 months, as well as women during pregnancy and lactation, ideally all at once, with careful attention to new data on human milk composition.
- Identify collaborative efforts across the federal government such as convening a multidisciplinary ad-hoc Advisory Committee to better integrate systems science approaches, including considerations of dietary patterns in treating and managing diet-related conditions and disorders;
- Review public-health based approaches such as policy, systems changes, and environmental supports (PSE) strategies that have been successful in promoting higher quality dietary intake, especially in key populations that are at high risk and/or disadvantaged, including strategies that affect the price, availability, and marketing of various foods and beverages;
- Support efforts to consider the Dietary Guidelines in relation to diverse dietary patterns and the sustainability of the food system;
- Promote and support systems-based approaches to increase breastfeeding initiation and lengthen duration, with a focus on disparities by geography, income, education, and race and ethnicity; and
- Other methodological considerations were put forth by topical areas; as one example, broadly consider diverse populations with varying age groups and different racial, ethnic, and socioeconomic backgrounds. Consider diversity in multiple areas of future diet and health research as well as consideration of socioeconomic factors, such as food security and access to healthy foods.

**SNEB Comments:**

- We encourage federal staff to work further towards addressing these fundamental research, monitoring, and surveillance processes needed to develop and translate dietary guidelines. This includes more strategic and significant investments in nutrition education research and more support for research on policy, systems change, and environmental supports development and evaluation.

- SNEB [supports calls for a coordinated federal approach and authority for nutrition research](#) that could potentially help strengthen the process for objective and independent development, review, and dissemination of the best scientific evidence to the American public for both healthy individuals and those with major diet-related illnesses.
- SNEB further supports the need for the evaluation of corresponding intended and unintended impacts of implementing these guidelines and needed changes to improve these impacts.

**8) Provide evidence-based recommendations on the best ways to translate the science into culturally- and contextually-relevant messages for *all* Americans, integrating the use of policy, systems changes, and environmental supports to ensure individuals and families can actualize the DGA recommendations.**

**Relevant 2020 DGAC Recommendation:** The 2020 DGAC acknowledged the 2015-2020 *Dietary Guidelines for Americans* included a Social-Ecological Model that illustrated how various sectors have a role in improving eating and physical activity behaviors. Furthermore 2020 DGAC recognized this information remains relevant for implementation of the *2020-2025 Dietary Guidelines for Americans* and can be adapted to understand how the structural barriers and facilitators of behavior related to food choice vary across the lifespan.

**SNEB Comments:** [CNPP is now a part of the USDA Food and Nutrition Service](#); therefore, the 2020-2025 DGA should show a stronger demonstration of working with federal nutrition assistance programs, including SNAP-Ed. Efforts to better connect with the federal nutrition assistance programs should also include reaching out to relevant stakeholders and equity consultants, who have extensive experience with diverse populations and more recent experience considering innovative ways to integrate policy, system changes, and environmental supports to help *all* Americans follow the latest DGAs and better address the social determinants of health. This is particularly important during this pandemic and depressed economy and with increased attention towards addressing food justice as a part of racial justice. Without question, our current food supply makes it extremely difficult to eat healthfully and there are extreme disparities within communities of Color and characterized as low-income that make it even more challenging to follow healthy dietary patterns. As one example, the translation to DGAs and relevant nutrition education and promotion materials should include modifying the rationale put forth for the *Start Simple with MyPlate* campaign that states most Americans “lack the motivation and skills to make changes to their eating routines.” In addition, these efforts must consider the growing expansion of online SNAP access so as to promote healthy eating while protecting participants from predatory digital marketing that might promote unhealthy foods and beverages. Other suggested recommendations include but are not limited to:

- Align nutrition policies, agriculture policies, and federal nutrition assistance programs with the DGA and transform the food system to promote population health;
- Acknowledge that healthful food choices can be achieved only when systems and policies are coordinated to support such choices;

- Make healthy foods and beverages accessible and affordable;
- Encourage government, non-government, and industry develop more innovative approaches to increase access to paid family leave to support mothers in establishing and maintaining breastfeeding, including childcare subsidies;
- Increase access to federal programs that promote and support breastfeeding, including CDC’s Hospitals Promoting Breastfeeding Program and WIC’s breastfeeding peer counselor program;
- Promote and expand access to supports like breast pumps and breastfeeding counseling provided by the Affordable Care Act;
- Limit access to high-calorie, nutrient-poor foods and sugar-sweetened beverages in public places;
- Encourage healthy eating and physical activity in child care and education settings;
- Within schools, maintain comprehensive school meal guidelines that increase intake of vegetables, fruits, and whole grains, and limit sodium, added sugars, saturated fat, and *trans* fats; make drinking water freely available throughout the day; prohibit marketing of unhealthy foods; eliminate all sugar-sweetened beverages;
- In food retail settings, shift in-store marketing from unhealthy to healthy options to support rather than undermine healthy eating, including through placement, pricing, and promotion;
- In restaurants, shift menus, portion sizes, marketing, pricing, and other promotions to provide and support healthier options of food and beverages, especially for children;
- Implement Front-of-Package labels that help consumers make healthy choices;
- Reduce added sugars through measures like pricing/taxes of sugar drinks, and reduce sodium content in foods through regulatory limits;
- Expand access to and use of healthy built environments and make physical activity accessible, affordable, and safe;
- Encourage consumer behavior consistent with food safety principles to prevent foodborne illness; and,
- Promote a sustainable and safe food supply to ensure long-term food security.

**9) Support efforts to consider the DGA in relation to sustainability of our food system**

**Relevant 2020 DGAC Recommendation:** The 2015 DGAC found consistent evidence that a dietary pattern higher in plant-based foods is both beneficial for health and associated with lesser environmental impact, including greenhouse gas emissions and energy, land, and water use than the average US diet, even though sustainability was not a selected topical area for the 2020 DGAC.

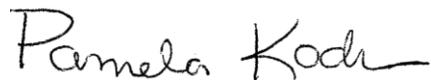
**SNEB Comments:** The 2020-2025 DGA should consider the ecological sustainability implications of our nation’s dietary guidance on our food system if this guidance were adopted by all Americans. It is the position of the Society for Nutrition Education and Behavior that environmental sustainability should be inherent in dietary guidance, whether working with individuals or groups about their dietary choices or in setting national dietary guidance. Improving the nutritional health of a population is a long-term goal that requires ensuring the long-term sustainability of the food system. Current environmental trends, including those

related to climate change, biodiversity loss, land degradation, water shortages, and water pollution, threaten long-term food security and are caused in part by current diets and agricultural practices. Addressing these problems while producing more food for a growing population will require changes to current food systems. Dietary choices have a significant role in contributing to environmental impacts, which could be lessened by consuming fewer overconsumed animal products and more plant-based foods while reducing excess energy intake and the amount of food wasted. Discussion of sustainability within governmental dietary guidance is common in many countries, is consistent with previous US guidelines, and is within the scope of authorizing legislation. Dietary choices are a personal matter, but many American consumers are motivated by a concern for the environment and would welcome sound advice from credentialed nutrition professionals.

Since the 2015 DGAC review, the evidence regarding ecological sustainability implications of our nation's dietary guidance has expanded substantially and continues to grow, consistently indicating a strong relationship between what we eat, our nation's health, and our planet's health.

Thank you for considering our comments. I am happy to discuss any questions you may have. Feel free to contact me at [president@sneb.org](mailto:president@sneb.org) and 317-328-4627.

Sincerely,



Pamela Koch, EdD, RDN  
President, Society for Nutrition Education and Behavior