

Organizational Sign-On Letter: Including Sustainability in the 2025-2030 DGA

Center for Biological Diversity and Center for Science in the Public Interest are seeking organizational sign-ons to the letter pasted below to submit to Docket No. HHS-OASH-2022-0005 regarding Scientific Questions to be Examined to Support the Development of the Dietary Guidelines for Americans 2025-2030. The deadline to sign on is 12 PM EST on Monday, May 16th. Please complete the form below.

Questions and requests for a pdf of the letter (which includes references) should be directed to mrifkin@biologicaldiversity.org and cochran@cspinet.org.

Admiral Rachel L. Levine, MD
Assistant Secretary for Health
U.S. Public Health Service
U.S. Department of Health and Human Services

Janet de Jesus, MS, RD
Nutrition Advisor
Division of Prevention Science
Office of Disease Prevention and Health Promotion
U.S. Department of Health and Human Services

Re: Scientific Questions to be Examined to Support the Development of the Dietary Guidelines for Americans 2025-2030; Docket No. HHS-OASH-2022-0005

Dear Assistant Secretary Levine and Ms. de Jesus,

We, the undersigned organizations, are committed to ensuring the well-being of Americans through nutritious, well-balanced diets, and a healthy food system. We appreciate the opportunity to comment on the proposed list of scientific questions for the 2025-2030 Dietary Guidelines for Americans (DGA). However, we are concerned that the Departments' proposal to address sustainability outside of the 2025 Dietary Guidelines Advisory Committee (DGAC) would compromise its long overdue incorporation into the next edition of the DGA. Incorporating the relationship between nutrition and climate change and the related environmental crises into the development of the next DGA is urgently needed. This will support long-term food and nutrition security, the administration's stated priorities around equity and the climate crisis, and the Departments' priorities for the proposed scientific questions regarding importance to public health, impact to federal programs, and research availability. Thus, we urge HHS and USDA to develop sustainable dietary pattern recommendations as a core part of the 2025-2030 DGA by integrating such content into the 2025 DGAC's scope of work and ensuring that any separate process is equally rigorous and incorporated into the guidelines.

Fundamentally, no substantial conflict exists between health-related and sustainability-related dietary recommendations for the U.S. population. Extensive reviews integrating nutrition and sustainability recommendations advocate for increased intake of fruits, vegetables, beans and legumes and reduced intake of meat, especially red meat. Despite the compatibility, the DGAs to date have not included a substantial body of scientific literature on healthy, sustainable diets. The 2015 DGAC noted that evidence indicates health-related and sustainability-related nutrition recommendations are fundamentally aligned not only with each other, but with current and future food security and overall food system resilience, two of the Biden administration's stated policy priorities. In addition, the administration's focus on health equity and environmental justice further necessitates the inclusion of sustainability in the DGA due to the substantially disproportionate and synergistic adverse impacts of pandemics, food deserts, CAFOs, slaughter facilities, and contaminated water supplies on those who are Black, Indigenous, people of color and underserved communities.



In fact, the President's Executive Order 14008 specifically orders agencies to develop plans for climate change adaptation and resiliency, which can only be achieved by considering the relationship between the climate emergency and food and nutrition security. Furthermore, the first step of adaptation is to minimize the need – that is, mitigate emissions to reduce the urgency and economic expenses of adaptation – which cannot be achieved without addressing food and agriculture. These concepts have been accepted in principle by the President and USDA in their respective calls for climate-smart agriculture. But the situation

demands further action: limiting global diet-related emissions is critical to meeting climate change goals. Research shows that if we maintain current U.S. dietary patterns, diet-related emissions will continue increasing, moving us farther from the necessary reductions needed to avoid catastrophic climate change by 2030.

The DGA's outsized impact on public health through food and nutrition policy, agriculture, and government programs— particularly those that serve our most vulnerable populations — necessitates that sustainability be embedded to effectively meet the DGA's goals. Should the Departments proceed with a review of the evidence on this topic separate from the DGAC's scope of work, we urge you to prioritize completing the separate process on a timeline that ensures that the 2025-2030 DGA includes guidance on sustainable dietary patterns. Further, it is imperative that this separate process be at least as scientifically rigorous and transparent as the DGAC review process—including adequate opportunity for public comment on the questions to be addressed, the experts appointed to review the evidence, the methods to be used to review the evidence, and the translation of expert panel conclusions into dietary guidance.

Recommendations encouraging widespread adoption of sustainable diets cannot wait. We urge HHS and USDA to commit to integrating sustainability into the development of the 2025-2030 DGA. If it will not be addressed through the DGAC, then we urge the Departments to announce a clearly defined, transparent process and timeline prior to the formation of the DGAC that will ensure sustainability is addressed in the 2025-2030 DGA.

Sincerely,
[Names of Organizations]

 rdaeger@gmail.com (not shared) [Switch account](#) 

Organization

Your answer

Your name

Your answer

Your email

Your answer

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