



March 28, 2018

Brandon Lipps
Administrator, Food and Nutrition Service, U.S. Department of Agriculture

Donald Wright
Deputy Assistant Secretary for Health, Office of Disease Prevention and Health Promotion,
Office of the Assistant Secretary for Health, U.S. Department of Health and Human Services

Submitted via online form to: Regulations.gov

Docket Number FNS-2018-0005 / Request for Comments: Dietary Guidelines for Americans

Dear Mr. Lipps and Mr. Wright:

The Plant Based Foods Association (PBFA) is a trade association founded in 2016 to promote the plant-based foods industry by removing obstacles to a fair and competitive marketplace for alternatives to animal ingredients and products. In just two years, we have grown to 100+ company members, which range from innovative start-ups to large, established food companies.

The Dietary Guidelines for Americans serves as a critical evidence-based tool that shapes public policy and the food environment, which influence dietary behavior. We appreciate the opportunity to provide input during this phase of the process. We believe the Guidelines should support and facilitate Americans' ability to make healthier food choices through improvements to public policies and the evolving food environment.

Relevance of Plant-Based Foods

The increasing popularity of plant-based foods is reflected by Nielsen survey data showing that 39% of Americans are actively trying to add more plant-based foods to their diets. The current Guidelines already support the need for increased consumption of plant-based foods. To help Americans make healthier food and beverage choices, we suggest drafting an additional Appendix focused on a Vegan/Plant-Based Pattern to include plant-based meat and dairy alternatives to fit into a Healthy U.S.-Style Pattern. This will encourage the public to choose from a variety of healthier food and beverage choices that can be used throughout the lifespan.

Importance of Plant-Based Foods

It is critical to support the public's desire to increase plant-based foods as there is overwhelming scientific evidence that demonstrates that plant-based diets prevent chronic diseases and promote health. For example, the diet has been shown to reverse coronary atherosclerosis and

improve cancer survival when paired with a healthy lifestyle. In contrast, high meat consumption is linked to chronic diseases such as type 2 diabetes, cardiovascular diseases, and several forms of cancer. By implementing policies to make healthy plant-based foods more available, the Guidelines will help increase overall health and facilitate adoption of plant-based diets.

Potential Federal Impact of Plant-Based Foods

Consistent, evidence-based dietary guidance will provide important health and economic benefits to federal meal programs and other food service providers, which rely on the Guidelines to create nutritious menus. We respectfully request the development and inclusion of policies to support easier implementation of plant-based foods and beverages. By developing policies to easily incorporate plant-based foods and beverages, administrators of federal food and nutrition programs will have the ability to successfully add healthier options into their programs.

Social-Ecological Factors to Encourage Healthy Eating Patterns

The Dietary Guidelines for Americans provides critical health and nutrition information and advice. Unfortunately, that advice is not adequately supported by policies that ensure availability of fresh fruits, vegetables and other healthy, plant-based options.

Both the 2015 and 2010 Guidelines included chapters on the role of the food environment and policy in encouraging Americans to make healthy food choices. The 2015 edition states: “Consistent evidence shows that implementing multiple changes at various levels of the Social-Ecological Model is effective in improving eating and physical activity behaviors.”

We propose adding “Social-Ecological Factors to Encourage Healthy Eating Patterns” to explore questions such as: What are effective behavioral, food environment, and policy interventions that can encourage and support increased consumption of plant-based foods such as fruits, vegetables, plant-based meat and dairy alternatives, whole grains, nuts, and seeds as part of a healthy diet?

Previous committees have found that recommendations alone are not sufficient, and by exploring these factors we can change our food policies to support a healthy food environment that encourages and supports increased consumption of plant-based foods.

PBFA and members look forward to participating in the Dietary Guidelines 2020-2025 process. Please let us know if we can be of assistance to your team during the next phases of development.

Sincerely,

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