

August 12, 2020

Kristin Koegel
USDA Food and Nutrition Service
Center for Nutrition Policy and Promotion (CNPP)
1320 Braddock Place, Room 4094
Alexandria, Virginia 22314

Re: USDA and HHS Final Advisory Report on the Dietary Guidelines for Americans 2020-2025 [Docket FNS-2020-0015]

Dear Members of the 2020-2025 Dietary Guidelines Advisory Committee:

On behalf of the Plant Based Foods Association (PBFA), representing over 170 member companies, we are writing in support of the Final Advisory Report on the Dietary Guidelines for Americans 2020. We applaud the Committee's commitment to an evidence-based approach by establishing Guidelines and Patterns with continued emphasis on plant-based eating to support public health.

Confirming the Science to Support Plant-Based Eating Patterns

Plant-based foods play a unique role in healthy diets and dietary patterns to optimize and increase health at all life stages. Decades of research have shown that shifting to a plant-based diet not only reduces chronic disease risk factors, it is optimal for a long healthy life.

According to the Academy of Nutrition and Dietetics, "vegetarian diets including vegan diets are healthful, nutritionally adequate, and may provide health benefits in the prevention and treatment of certain diseases (heart disease, type 2 diabetes, hypertension, certain types of cancer and obesity). These diets are appropriate for all stages of the life cycle, including pregnancy, lactation, infancy, childhood, adolescence, older adulthood, and for athletes. Plant-based diets are more environmentally sustainable than diets rich in animal products because they use fewer natural resources and are associated with much less environmental damage."

We applaud the continued emphasis of evidence-based guidance celebrating plant-based diets and plant-based eating (Healthy - Vegetarian, Mediterranean, and U.S.) Dietary Patterns with the Committee highlighting that all 3 Food Patterns share core components of "obtaining the majority of energy from plant-based foods, such as fruits, vegetables, legumes, whole grains, nuts and seeds, and obtaining protein and fats from nutrient-rich food sources."

Consistent with the 2015 Advisory Committee Report, the 2020 Advisory Report states

that “the Committee found that negative (detrimental) health outcomes were associated with dietary patterns characterized by higher intake of red and processed meats...”.

This is further supported by the Committee’s evaluation of animal foods and sources showing strong and moderate associations that link red meat, processed meat, high-fat dairy and saturated fats to several chronic diseases including all-cause mortality, cardiovascular disease, obesity, type 2 diabetes, bone health, colorectal cancer and breast cancer. (Page 513/835). We agree that not only should meat and processed meat be reduced, but avoided for optimal health promotion. The Patterns should reflect guidance emphasizing more sources of plant-based protein in all three Patterns that are essential for health, improved well-being and lowering risk of chronic disease. Legumes as a Protein source should not be limited to the Vegetarian Pattern.

We again applaud the Committee for continuing these plant-centric patterns, which emerged to help Americans increase intake of nutrients that were under-consumed, which includes vitamins A, E, and C, folate, magnesium, potassium and fiber. A diet rich in plant foods tends to be higher in all these nutrients that have health protective phytochemicals and fiber, which are exclusively found in plants. Animal products do not contain fiber. As noted by the Committee, “a noteworthy difference from the 2015 Committee report is that whole grains are now identified with almost the same consistency as vegetables and fruits as beneficial for the outcomes examined, suggesting that these 3 plant-based food groups are fundamental constituents of a healthy dietary pattern.”

Plant-based foods are increasingly in demand for health, environmental, cultural, and ethical reasons. We strongly affirm these findings and agree that a shift towards plant-based patterns is fundamental for lowering risk of disease and building optimal health while increased meat and animal food intake is associated with higher risk of disease and prevents long term health.

Additional Areas to Improve to Support Plant-Based Eating

We recommend the following items for consideration to better serve institutions, federal food and nutrition programs and the public to support plant-based eating habits.

Increased Plant-Based Options

It is critical that the Committee takes into account the growing demand and consumption of different sources of plant-based proteins when establishing Food Groups, Subgroups and Patterns to include and establish Guidelines to serve and include foods and Patterns for all Americans.

The increasing popularity of plant-based foods is reflected by the growing consumer demand for alternatives to conventional meat, seafood, eggs, dairy products. This trend is no longer limited to vegetarians and vegans. According to retail sales data that we commissioned, U.S. retail sales of plant-based foods have grown 11 percent in the past year (2019), bringing the total plant-based market value to \$4.5 billion. Americans are

actively trying to reduce meat and add more plant-based foods to their diets.

The Committee examined and found dietary patterns that showed statistically significant relationships “between dietary patterns consumed and all-cause mortality risk” stating that “dietary patterns without animal-products, such as those described as vegetarian, vegan, or determined by ‘plant-based’ diet indices” reduced risk of all-cause mortality. It is important to bridge studies to relevant dietary patterns. We strongly affirm the Committee’s guidance to improve overall dietary quality with these stated examples below that emphasize the importance of increasing plant-based foods and the reduction and substitution of animal-source foods for plant foods and polyunsaturated fats:

“Few Americans achieve or exceed the Adequate Intake for dietary fiber, and a dietary pattern that encourages the intake of fiber-rich foods, including whole grains, fruits, vegetables, nuts and legumes, and other plant-based foods would be beneficial to increase fiber intakes.” Fiber is only found in plant foods.

“To reduce saturated fat intake, the dietary pattern should replace sources of saturated fat with sources of polyunsaturated fats by substituting certain animal-source foods, especially processed meats and certain high-fat dairy products, with sources of polyunsaturated fats, such as seafood, seeds, nuts, legumes, and appropriate vegetable oils. In addition, if meat and dairy foods are included in the dietary pattern, choosing lean cuts and lower fat dairy options is preferred.”

With these consistent research findings and framework for Guidelines emphasizing the need to increase plant-based foods and reduce and replace animal-source foods, we strongly urge the USDA and HHS to build Patterns that include more plant-based foods and beverages to increase options for all Americans and improve overall dietary quality and nutrient density.

To help Americans make healthier food and beverage choices that fit into all lifestyles and cultures, we suggest drafting an additional Appendix focused on sources of plant-based protein and dairy alternatives to fit into all three (Healthy - Vegetarian, Mediterranean, and U.S.) Dietary Patterns. This will encourage the public to choose from a variety of healthier food and beverage choices that can be used throughout the lifespan while adapting to fit cultural, personal and individual needs and preferences in food choices.

Plant-Based Sources of Protein

The Advisory Report suggests emphasizing plant foods and replacing animal-source foods, but plant-based sources of protein are limited to legumes, nuts, seeds, and soy, with legumes only utilized in the Vegetarian Pattern as a protein source. By excluding legumes and additional plant proteins in the Healthy U.S. and Mediterranean Patterns, the Committee fails to recognize cultures that include legumes as their main protein source. Unlike meat, sources of protein such as legumes are excellent sources of both soluble and insoluble fibers associated with a lower risk of cardiovascular disease (including well-established risk factors such as LDL-cholesterol), colon cancer, and type

2 diabetes. Regular intake of plant-based sources of protein including legumes should be recognized and recommended in all Patterns as they have positive effects on health and can satisfy the Committee’s recommendation to help Americans achieve Adequate Intake of fiber while supplying all essential amino acids.

Dairy Intake Not Supported by Science

Calcium and vitamin D were noted as nutrients of public concern with recommendations to increase dairy. The Advisory Report continues to promote dairy as a Food Group with recommendations of 2 to 3 cups a day depending on Pattern. However, according to the National Institutes of Health, 30-50 million Americans are lactose intolerant, disproportionately impacting communities of color “including approximately: 95 percent of Asians, 60 percent to 80 percent of African Americans and Ashkenazi Jews, 80 percent to 100 percent of American Indians, and 50 percent to 80 percent of Hispanics.”

Fortified plant-based milks and plant foods are accessible and nutritious that can provide the same amounts or sometimes more calcium and vitamin D as dairy. Plant-based milks are widely accessible and support those avoiding dairy due to health, culture, environmental and lifestyle choices. Though fortified soy milk is included as the sole alternative, there are several options that can serve as sources of bioavailable calcium including dark leafy greens, fortified beverages including plant milks and orange juice and fortified foods such as yogurts and other alternatives.

As the Committee stated, to improve overall diet quality, “dietary pattern should replace sources of saturated fat with sources of polyunsaturated fats by substituting certain animal-source foods, especially processed meats and certain high-fat dairy products.” It is critical that USDA and HHS take into account the Committee’s recommendation to limit saturated fat and dairy products. Plant-based milks and fortified foods continue to grow in demand and can serve as reliable sources to reduce saturated fat and should be included when establishing Food Groups, Subgroups and Patterns for all Americans.

Increased Representation

We agree that “all aspects of the population should be represented in the data considered and used to inform national guidance.” (page 766/835). Without data that incorporates food and beverage intake in the context of socioeconomic status, food security, cultural traditions, and religious or ethnic foods, Food Groups, Guidelines and Patterns will never reflect the population it serves. Communities of color are disproportionately impacted by the current Patterns and Food Groups with emphasis on Dairy and the lack of diversity in Protein Subgroups.

Future Directions

We strongly support the Future Directions identified in the Advisory Report that include increased representation in research data to create more inclusive guidance to serve all communities and the evaluation of sustainability of future dietary patterns.

Sustainability

We agree that there needs to be more support and consideration on sustainability when recommending dietary patterns and its impact on the food system. In 2015, the Committee concluded that a diet higher in plant-based foods and lower in animal foods was more health promoting and associated with lower environmental impact. We are disappointed that this sustainability guidance was ignored in the 2015 final guidelines and not addressed at all in this Advisory Report.

We thank the USDA and HHS for the opportunity to share our expertise on the Advisory Report. We support and celebrate the continued guidance of establishing plant-based foods and eating patterns for optimal health.

Americans are interested in incorporating more plant-based options into their diets for health, environmental, cultural, and ethical reasons. Eating Patterns, Food Groups and Subgroups need to reflect the population it serves by developing inclusive Patterns that continue to emphasize plant-based eating for long term health. We respectfully request the inclusion of more plant-based food and beverage options to help institutions, federal food and nutrition programs and the public successfully add healthier and culturally appropriate options into their everyday lives.

As the report moves to its final stages, establishing guidelines for the next 5 years, we must remember not to allow politics prevent us from building guidance that remains evidence-based to support the optimal health for our people and the planet. PBFA and our members look forward to the final Dietary Guidelines for Americans 2020-2025.

Sincerely,

Michele Simon, JD, MPH
Executive Director, Plant Based Foods Association