Tell the Trump Administration to Follow the Science in New Dietary Guidelines

A Public Comment Guide for the 2020-2025 Dietary Guidelines for Americans

The Dietary Guidelines for Americans (Dietary Guidelines) is the nation’s leading set of science-based nutrition recommendations. Serving millions of kids, families, seniors, and veterans each day through federal nutrition programs, the Dietary Guidelines is designed to promote health and prevent disease by helping all of us make healthier food choices.¹ The Dietary Guidelines is updated every five years by the US Department of Agriculture (USDA) and Department of Health and Human Services (HHS) to reflect the best available science and address the greatest threats to population health.

The process to develop the Dietary Guidelines is robust, and its scientific recommendations have remained largely consistent since its first issue in 1980. However, in some cases, the federal government has allowed industry interests to override the public interest. Now, the Trump administration’s unprecedented history of sidelining science may put the 2020-2025 Dietary Guidelines at risk.²

The process to develop the 2020-2025 Dietary Guidelines is well underway, and an extended public comment period will remain open through early May 2020. This is a key opportunity to use your expertise to inform the development of these guidelines and ensure that they use the best and latest science—including a rapidly expanding body of research on the long-term sustainability of dietary patterns—to protect current and future generations from the most pressing threats to public health.

What is the Process to Update the Dietary Guidelines?

The process to develop the 2020-2025 Dietary Guidelines involves four main steps:

1. The USDA and HHS, with public input, identify topics and scientific questions to be examined.
2. The USDA and HHS solicit nominations and select a panel of health and nutrition experts to form the Dietary Guidelines Advisory Committee (Committee).
3. The Committee reviews current nutrition science on the selected topics, holds a series of public meetings to discuss the issues, and writes a scientific report containing its recommendations.
4. The USDA and HHS update the Dietary Guidelines based on the Committee’s report and taking into account public comments.

We’re currently nearing the end of step three: Since March 2019, the Committee has been reviewing the literature, meeting in public sessions, and considering public comments. You can find detailed information about the topics and questions being reviewed by the Committee, including research protocols and draft conclusions, on the Dietary Guidelines website. The Committee is expected to complete its scientific report in May 2020, and the USDA and HHS will issue final Dietary Guidelines by December 2020.

How to Submit a Comment

Go to the public comment page on Regulations.gov to find the proposed policy (docket FNS-2019-0001) and click on the “Comment Now!” button. While a submission can be typed directly into the website, uploading a
separate document may be easier for you to edit, save, and submit. Make sure all documents contain your name and contact information. After submitting, be sure to check your email for a receipt confirmation.

Once you have submitted your comment, let us know by filling out this report-back form. Consider including a copy of your comments and please let us know if this guide has been useful.

**Tips for Writing an Effective Comment**

Remember that the most effective comments are thorough, unique, and specific. The public comment process allows experts and the general public to help agencies understand the importance and full range of consequences of a proposed policy or recommendation.

- Write concisely but provide all details you think may be relevant.
- It is not enough to simply agree or disagree with research or policy decisions made by the agencies or Committee. Explain your reasoning.
- Speak from your experience to describe the personal impacts of the Dietary Guidelines. That could include stories or anecdotes about how it impacts your family, community, clients, or profession.
- Address potential negative impacts, overlooked impacts, and intended or unintended consequences of dietary recommendations. When available, include statistics about the populations impacted and attach key studies and research so they are on the record.
- While you can use model talking points (see below) to make your case, it is essential that your comment contains unique elements. If your comment is too similar to others submitted, it may not be considered.

**2020-2025 Dietary Guidelines Talking Points**

In many areas, the Dietary Guidelines aligns with the evidence and makes strong recommendations to promote public health, which must be maintained and protected. However, the Dietary Guidelines has also strayed from the science when industry interests might be threatened. In past editions, the meat industry has successfully influenced recommendations related to meat, plant-based diets, and dietary sustainability; in the current update, the formula industry may have an interest in securing favorable nutrition recommendations for infants and toddlers. Public comments can highlight opportunities for federal agencies to support the Committee in centering all aspects of the 2020-2025 Dietary Guidelines in current scientific evidence.

**General talking points**

- More than [60 percent of all adults](#) in the United States now live with one or more chronic diseases, including diabetes, cancer, and cardiovascular disease. These diseases are the leading cause of our annual [3.5 trillion](#) in healthcare expenditures, and many are caused in part by poor diets.
- The Dietary Guidelines is a powerful tool for promoting public health and preventing chronic disease. As the nation’s leading set of nutrition recommendations, it must maintain a strong scientific foundation.
- People of color and low-income populations are disproportionately impacted by chronic diseases, due in part to structural inequalities and systemic racism. To achieve its full potential impact, the Dietary Guidelines must take steps to bring healthier diets within reach for all populations.
- I strongly urge the Committee, and the USDA and HHS, to draft and publish Dietary Guidelines that are consistent with current science, prioritize our most vulnerable populations, and identify complementary programs and policies to support healthy food access and address the root causes of health disparities.
Considering sustainability in the Dietary Guidelines

- The 2015 Committee 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.
- In early 2020, UCS and colleagues applied the Committee’s methodology to update the systematic review with recent research on this topic. Our forthcoming findings reveal a growing volume of studies examining the environmental implications of US dietary patterns and highlight a pressing need for updated Dietary Guidelines to protect long-term public health and our nation’s future food security.6
- I strongly urge the Committee, and the USDA and HHS, to consider the latest scientific evidence surrounding our future health and food security and publish guidelines that incorporate discussion of sustainable diets.

Protecting science

- During the two years before the release of the 2015-2020 Dietary Guidelines, food and beverage companies spent more than $77 million in lobbying activities directed at Congress on issues including the Dietary Guidelines.7
- The Trump administration has proven particularly receptive to industry interests, while displaying an unprecedented pattern of sidelining advice from scientific advisory committees.8 With many thousands of lives and billions in health care costs hanging in the balance, the stakes are too high to compromise the integrity of the Dietary Guidelines.
- I strongly urge the USDA and HHS to protect the scientific integrity of the Dietary Guidelines process by shielding the Committee from industry interests and external political pressures that may adversely affect their ability to develop evidence-based recommendations.

Meat consumption and public health

- Research shows that processed meat intake is linked to colorectal cancer. In 2015, an international panel of experts found that each 50-gram daily serving of processed meat—including bacon, deli meat, and hot dogs—is associated with an 18 percent increase in colorectal cancer risk.9
- A report by the Union of Concerned Scientists found that if adults in the US had been following science-based recommendations to consume little to no processed meat in 2018, nearly 3,900 lives and $1.5 billion in medical costs could have been saved via reductions in colorectal cancer.10
- The 2015-2020 Dietary Guidelines failed to name the risks associated with processed meat intake and did not explicitly recommend reducing intake of processed meat or red meat, despite the 2015 Committee’s findings that a healthy dietary pattern is generally lower in both.11
- I strongly urge the Committee, and the USDA and HHS, to consider current scientific evidence surrounding meat intake, particularly processed meat, and publish guidelines that recommend appropriately limiting consumption of these foods.

Health risks of added sugar

- Though the 2015-2020 Dietary Guidelines newly recommended that added sugars should be limited to 10 percent of a person’s daily calories, the science suggests this threshold should be lower.12
Limiting added sugars to no more than 6 percent of a person’s daily calories would allow the average person to meet their dietary needs, including adequate intake of healthy foods like fruits, vegetables, and whole grains, while minimizing health risks.

Developing age-appropriate added sugar limits for children, including science-based recommendations of no added sugar for children under two, is essential to protecting their health. Almost one in three 1-year-olds (29 percent) consumes sugar-sweetened beverages on a given day.

Sugar-sweetened beverages are the primary source of added sugar in our diets. A report by the Union of Concerned Scientists found that if adults in the US who drink sugar-sweetened beverages had consumed one fewer serving (8.5 oz) per day in 2018, nearly 19,000 lives and $16 billion in medical costs could have been saved via reductions in type 2 diabetes.

I strongly urge the Committee, and the USDA and HHS, to consider current scientific evidence surrounding added sugar and publish guidelines that recommend a limit of no more than 6 percent of total calorie intake for the general population and age-appropriate limits for children.

Recommendations for pregnancy, infants, and toddlers

An abundance of evidence shows that the 1,000 days between the start of a pregnancy and a child’s second birthday are a critical window for building good health and promoting healthy brain development, yet many mothers and children still face challenges in achieving optimal nutrition.

The Trump administration’s refusal to sign the breastfeeding resolution at the 2018 World Health Assembly on behalf of the US was an alarming dismissal of established scientific evidence regarding the benefits of breastfeeding. Currently, 1 in 6 infants in the US is never breastfed, and only 25 percent are exclusively breastfed to 6 months in accordance with existing recommendations.

The Dietary Guidelines will inform the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), which serves close to half (46.7 percent) of all infants in the US.

I strongly urge the Committee, and the USDA and HHS, to consider current scientific evidence on nutrition for pregnant and lactating women, infants, and children through 24 months, and publish guidelines that are fully consistent with the best available science.

How to Stay Involved

As the development of the 2020-2025 Dietary Guidelines continues, there will be more opportunities to provide public comment and stay engaged in the process. For more information on the Dietary Guidelines, including current blog posts and updated comment guides, visit our website.

Additional Resources

- Abandoning Science Advice: One Year in, the Trump Administration is Sidelining Science Advisory Committees (Union of Concerned Scientists)
- Dietary Guidelines for Americans fact sheet (Union of Concerned Scientists)
- The Dietary Guidelines for Americans home page (USDA/HHS)
- EAT-Lancet Commission on Healthy Diets from Sustainable Food Systems (The Lancet Commissions)
- The First 1,000 Days: Nourishing America’s Future (1,000 Days)
• **Hooked for Life: How Weak Policies on Added Sugars Are Putting a Generation of Children at Risk** (Union of Concerned Scientists)

• **IARC Monographs on the Evaluation of Carcinogenic Risks to Humans** (International Agency for Research on Cancer)

• **In Support of Sustainable Eating: Why US Dietary Guidelines Should Prioritize Healthy People and a Healthy Planet** (Union of Concerned Scientists)


• **Scientific Report of the 2015 Scientific Advisory Committee** (USDA/HHS)

### About This Guide


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8. UCS. 2018.


12. HHS, USDA. 2015.
