

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 in its final stages, and a [public comment period](#) is now open through August 13, 2020. This is a final 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've reached the end of step three: Since March 2019, the Committee has reviewed the literature, held five public meetings and one webcast presentation, and considered tens of thousands of public comments. You can find detailed information about the topics and questions that were reviewed by the Committee, including research protocols and draft conclusions, on the [Dietary Guidelines website](#). The Committee completed its work in July 2020 with the publication of its scientific report, and now it is up to the agencies to develop and issue new *Dietary Guidelines*, expected by December 2020.

Committee Recommends Lower Limits on Added Sugar, Consideration of Dietary Sustainability

On July 15, the USDA and HHS published the [Committee's full final scientific report](#). Many of its findings remain consistent with past dietary guidance, including the common characteristics of a healthy diet: one with "higher intake of vegetables, fruits, legumes, whole grains, low- or nonfat dairy, lean meat and poultry, seafood, nuts, and unsaturated vegetable oils and low consumption of red and processed meats, sugar-sweetened foods and drinks, and refined grains." However, the report also contained some new recommendations, such as:

- Adults and children aged 2 and older should get no more than 6 percent of total daily calories from added sugar, and children under 2 should not consume foods and beverages with added sugar altogether.
- Both men and women should have no more than one drink per day, if any, due to the relationship between higher levels of alcohol intake and greater risk of death from all causes.
- The government should consider the sustainability of the food system with respect to dietary guidance. Though the advisory committee was not tasked with reviewing this evidence, it issued this statement in response to a multitude of public comments on this topic, stating that the USDA and HHS should use appropriate mechanisms to address sustainability in the implementation of dietary guidance.

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 current (2015) *Dietary Guidelines* aligns with the evidence and makes strong recommendations to promote public health, and the 2020 Committee's new recommendations, if adopted by the USDA and HHS, would strengthen the guidelines in several ways. However, the *Dietary Guidelines* are subject to political and industry influence, and in past editions, the meat industry has successfully influenced recommendations related to meat, plant-based diets, and dietary sustainability. Because the Trump administration has a particularly poor record when it comes to following science and listening to experts, public comments at this stage are needed to demand that the USDA and HHS fully incorporate the Committee's science-based recommendations in the 2020-2025 *Dietary Guidelines*.

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.³ These diseases are the leading cause of our annual [\\$3.6 trillion](#) in healthcare expenditures, and many are caused in part by poor diets.⁴
- 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.⁵ 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 USDA and HHS to draft and publish *Dietary Guidelines* that identify complementary programs and policies to support healthy food access and address the root causes of health disparities by drawing on recommendations from Chapter 3 ("Everyone Has a Role in Supporting a Healthy Eating Pattern") of the 2015-2020 *Dietary Guidelines for Americans*.**

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 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
- Now, the 2020 Committee has again recognized the urgent need to consider sustainability in the Dietary Guidelines, saying that federal agencies must "support efforts to consider the Dietary Guidelines in relation to sustainability of the food system."
- The Committee also states, "The achievability and maintenance of healthy food and beverage intakes is dependent on a complex number of factors that influence food access, availability, and cost. Long-term maintenance of healthy intakes requires long-term support of associated food systems."
- **I strongly urge the USDA and HHS to respond to the Committee's recommendations by telling the public how it will implement the 2020-2025 *Dietary Guidelines* to promote the long-term sustainability of the food system.**

Resisting industry influence

- 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 adhering to the scientific conclusions reached by the Committee and providing full justification for any Committee findings omitted from final dietary guidance.**

Health risks of added sugar

- The [2015-2020 Dietary Guidelines](#) recommended for the first time a specific limit on added sugars—no more than 10 percent of a person’s daily calories.
- However, the science suggests this threshold should be lower,⁹ and the 2020 Committee has recognized the strength of that science, recommending in its report that added sugars be limited to 6 percent of a person’s daily calories, [as UCS urged](#).
- 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.¹⁰ Almost [one in three](#) 1-year-olds (29 percent) consumes sugar-sweetened beverages on a given day.¹¹
- 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.¹²
- **I strongly urge the USDA and HHS to act on the Dietary Guidelines Advisory Committee’s science-based recommendations by publishing guidelines that include a limit of no more than 6 percent of total calorie intake for the general population and no foods or beverages with added sugar for children under 2.**

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.¹³
- 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.¹⁴
- 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.¹⁵ The 2020 Committee has issued the same recommendation.

- **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.**

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,¹⁶ 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.¹⁷ 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.¹⁸
- 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.¹⁹
- **I strongly urge 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 Committee's findings**

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

- [Scientific Report of the 2020 Dietary Guidelines Advisory Committee](#) (USDA/HHS)
- [New Dietary Guidelines Report is a Science Success Story](#) (Union of Concerned Scientists blog)
- [Is the US Ready for Sustainable Dietary Guidelines? New Research Makes a Compelling Case](#) (Union of Concerned Scientists blog)
- [New Dietary Guidelines Could Help Us Kick Our Sugar Habit—But Will Science Win Out?](#) (Union of Concerned Scientists blog)
- [Dietary Guidelines for Americans fact sheet](#) (Union of Concerned Scientists)
- [The Dietary Guidelines for Americans home page](#) (USDA/HHS)
- [Delivering on the Dietary Guidelines: How Stronger Nutrition Policy Can Cut Healthcare Costs and Save Lives](#) (Union of Concerned Scientists)
- [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)

- [Opposition to Breastfeeding Resolution by US Stuns World Health Officials \(New York Times\)](#)
- [Scientific Report of the 2015 Scientific Advisory Committee \(USDA/HHS\)](#)

About This Guide

This public comment guide was produced by the Union of Concerned Scientists. Updated July 29, 2020. Available online at <http://www.ucsusa.org/DGA-comment-guide>.

¹ U.S. Department of Health and Human Services (HHS) and U.S. Department of Agriculture (USDA). 2015. *2015–2020 Dietary Guidelines for Americans*. 8th Edition. Online at <http://health.gov/dietaryguidelines/2015/guidelines/>. Accessed July 29, 2020.

² Reed, G., S. Shulman, P. Hansel, and G. Goldman. 2018. *Abandoning science advice: One year in, the Trump administration is sidelining science advisory committees*. Cambridge, MA: Union of Concerned Scientists. Online at www.ucsusa.org/sites/default/files/attach/2018/01/abandoning-science-advice-full-report.pdf, accessed October 12, 2018.

³ Centers for Disease Control and Prevention. 2019. Chronic Diseases in America. Online at <https://www.cdc.gov/chronicdisease/resources/infographic/chronic-diseases.htm>. Accessed July 29, 2020.

⁴ Centers for Medicare and Medicaid Services. 2020. *Historical National Health Expenditures, 2018*. Online at <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/NationalHealthExpendData/NHE-Fact-Sheet>. Accessed July 29, 2020.

⁵ National Academies of Sciences, Engineering, and Medicine; Baciu A, Negussie Y, Geller A, et al., editors. 2017. *Communities in Action: Pathways to Health Equity*. Washington, DC: National Academies Press (US). Online at www.ncbi.nlm.nih.gov/books/NBK425844/. Accessed July 29, 2020.

⁶ Reinhardt, S., R. Boehm, N. Tichenor Blackstone, N.H. El-Abbadi, J.S. McNally Brandow, S.F. Taylor, and M.S. DeLonge. 2020. "Systematic Review of Dietary Patterns and Sustainability in the United States." *Advances in Nutrition*. doi: [10.1093/advances/nmaa026](https://doi.org/10.1093/advances/nmaa026). Accessed July 29, 2020.

⁷ Stillerman, K. 2019. "Big Food" Companies Spend Big Money in Hopes of Shaping the Dietary Guidelines for Americans. *The Equation*. Cambridge, MA: Union of Concerned Scientists. Blog, June 6. Online at <https://blog.ucsusa.org/karen-perry-stillerman/big-food-companies-spend-big-money-in-hopes-of-shaping-the-dietary-guidelines-for-americans>. Accessed June 10, 2019.

⁸ UCS. 2018.

⁹ HHS, USDA. 2015.

¹⁰ Vos, Miriam B., Jill L. Kaar, Jean A. Welsh, Linda V. Van Horn, Daniel I. Feig, Cheryl AM Anderson, Mahesh J. Patel et al. 2017. Added sugars and cardiovascular disease risk in children: a scientific statement from the American Heart Association. *Circulation*, May 9. Online at <https://www.ahajournals.org/doi/full/10.1161/CIR.0000000000000439>.

¹¹ Kay, M., Welker, E., Jacquier, E., & Story, M. 2018. Beverage Consumption Patterns among Infants and Young Children (0–47.9 Months): Data from the Feeding Infants and Toddlers Study, 2016. *Nutrients* 2018, 10(7), 825; <https://doi.org/10.3390/nu10070825>.

¹² Reinhardt. 2019.

¹³ World Health Organization; International Agency for Research on Cancer. 2015. IARC Monographs evaluate consumption of red meat and processed meat. Press release, October 26.

¹⁴ Reinhardt, S. 2019. *Delivering on the Dietary Guidelines*. Cambridge, MA: Union of Concerned Scientists. Online at <http://www.ucsusa.org/sites/default/files/attach/2019/06/delivering-on-the-dietary-guidelines-report.pdf>. Accessed July 29, 2020.

¹⁵ Dietary Guidelines Advisory Committee (DGAC). 2015. *Scientific Report of the 2015 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and the Secretary of Agriculture*. Washington, DC: US Department of Agriculture. Online at <https://health.gov/dietaryguidelines/2015-scientific-report/PDFs/Scientific-Report-of-the-2015-Dietary-Guidelines-Advisory-Committee.pdf>. Accessed July 29, 2020.

¹⁶ Sullivan, L. M., & Brumfield, C. 2016. *The First 1,000 Days: Nourishing America's Future*. Washington, DC. 1,000 Days.

¹⁷ Jacobs, A. 2018. Opposition to Breast-Feeding Resolution by U.S. Stuns World Health Officials. *New York Times*, July 2018.

¹⁸ Centers for Disease Control and Prevention (CDC). 2018. *Breastfeeding Report Card*. Online at www.cdc.gov/breastfeeding/pdf/2018breastfeedingreportcard.pdf. Accessed July 29, 2020.

¹⁹ Trippe, C., Tadler, C., Johnson, P., Giannarelli, L., Betson, D. 2019. *National- and State-Level Estimates of WIC Eligibility and WIC Program Reach in 2016*. Washington, DC: US Department of Agriculture. Online at <https://fns-prod.azureedge.net/sites/default/files/ops/WICEligibles2016-Volume1.pdf>. Accessed July 29, 2020.