



2020 Dietary Guidelines Advisory Committee Public Comments

Name: Nicole Manu

Organization: The Good Food Institute

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Good morning committee members and thank you for the opportunity to speak today.

My name is Nicole Manu and I am a Staff Attorney at The Good Food Institute. GFI is a Washington, D.C.-based nonprofit focused on building a sustainable, healthy, and just food system by supporting the markets for plant-based and cell-based meat, eggs, and dairy.

The health benefits of a diet rich in plant-based foods are supported by overwhelming scientific and medical evidence. Therefore, the Committee should recommend a stronger emphasis on plant-based foods in the 2020 Dietary Guidelines for Americans. In particular, a range of new and innovative plant-based foods are now on the market that can make it easier for the public to make healthy food choices. Additionally, the Guidelines should encourage the consumption of non-animal-based proteins to all Americans rather than highlighting them only in the Healthy Vegetarian Eating Pattern.

Plant-based meats present one opportunity for the Committee to recommend a greater variety of plant-based foods in the upcoming Guidelines. Plant-based meats provide a direct replacement for animal meat. They include both products that seek to replicate the taste and texture of animal meat, as well as plant-forward products that serve as functional meat replacements. Many plant-based meats have just as much or more protein than animal meat, while containing less sodium and saturated fat. For example, both wheat-based seitan and soy-based tempeh have over 20 grams of protein per 100 grams and minimal or no saturated fat.¹ USDA recently credited tempeh in Child Nutrition Programs, noting that the update will allow Program operators to diversify menus.² Several brands of plant-based meats that more closely mimic the taste and texture of animal meat also contain high amounts of protein and even significant amounts of dietary fiber, which is not present in animal meats.³

¹ USDA, Agric. Research Serv., *Basic Report: 16114, Tempeh*, USDA National Nutrient Database for Standard Reference Legacy Release (April 2018), <https://bit.ly/2NtNCu7> (last accessed July 2, 2019); USDA, Agric. Research Serv., *Full Report (All Nutrients): 45356836, ORIGINAL SEITAN, UPC: 753182099224*, USDA Branded Food Products Database (July 2018), <https://bit.ly/2YrYzNX> (last accessed July 2, 2019).

² USDA, *Crediting Tempeh in Child Nutrition Programs*, Apr. 17, 2016, available at <https://bit.ly/2YopWZ8>.

³ Elaine Watson, *Nestle Gears Up to Launch the Plant-based Awesome Burger under the Sweet Earth Brand*, FoodNavigator-USA (last updated Jun. 10, 2019), <https://bit.ly/324hSz4>.

Plant-based milks present another opportunity for the Committee to recommend a greater variety of plant-based foods in the upcoming Guidelines. There are many more widely available plant-based milks with nutritional profiles comparable to cow's milk than there were five years ago. For example, hemp milk, oat milk, and pea milk are typically fortified with calcium and vitamin D to levels comparable to cow's milk.⁴ Pea milk also contains more potassium than cow's milk, with the same amount of protein.⁵ And in addition to these, water lentil milk, an emerging plant-based milk option, is expected to have considerable amounts of naturally occurring calcium and iron.⁶

Including a broader range of plant-based foods in the Dietary Guidelines will be beneficial to all Americans, but especially to groups who do not eat animal products because of health concerns or ethical or religious beliefs, and many people of color who commonly cannot consume conventional dairy because of lactose intolerance. We urge the committee to be guided by the plentiful scientific and medical evidence highlighting the health benefits of plant-based foods, to strengthen the Guidelines' emphasis on these foods.

Thank you again for the opportunity to speak today. We look forward to participating in the future as the 2020 Dietary Guidelines for Americans continue to be developed.

⁴ USDA, Agric. Research Serv., *Basic Report: 01086, Milk, nonfat, fluid, with added nonfat milk solids, vitamin A and vitamin D (fat free or skim)* (April 2018), <https://bit.ly/2Ntcl1H> (last accessed July 2, 2019).

⁵ Carol Rees Parrish, M.S., R.D., *Moo-ove Over, Cow's Milk: The Rise of Plant-Based Dairy Alternatives*, Jan. 2018, available at <https://at.virginia.edu/2GMNEpn>.

⁶ Elaine Watson, *Water Lentil Milk...A New Option in the Plant-based Dairy Case?*, FoodNavigator-USA (last updated May 29, 2019), <https://bit.ly/2XmxlX1>.