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## Re: Docket HHS-OASH-2024-0017; Comments to the Department of Health and Human Services and the Department of Agriculture regarding the Scientific Report of the 2025 Dietary Guidelines Advisory Committee

The Good Food Institute (GFI) appreciates the opportunity to submit these comments for consideration by the U.S. Department of Health and Human Services and the U.S. Department of Agriculture (the Departments) regarding the Scientific Report (the Report) of the 2025-2030 Dietary Guidelines Advisory Committee (the Committee). GFI is a nonprofit think tank focused on developing the roadmap for a sustainable, secure, and just protein supply. We do this by identifying effective solutions, mobilizing resources and talent, and empowering partners across the food system to make plant-based, cultivated, and fermentation-enabled meat, eggs, and dairy (together known as "alternative proteins"), nutritious, accessible, affordable, and delicious.

As you know, the Dietary Guidelines for Americans (DGA) have a significant impact on federal policies and food programs, practitioner guidance, and nutrition education. The work of the Departments to update the DGA ensures that consumers have access to accurate information that helps them to make nutritious choices to suit their diverse dietary and economic needs. We thank the Departments for the work you are undertaking to rigorously review the recommendations within the Report in support of an updated DGA that promotes improved nutrition and health across the lifespan.

#### **Overview of our recommendations**

We urge the Departments to adopt the Committee's recommended "Eat Healthy Your Way" dietary pattern in the 2025-2030 DGA, which builds on previous iterations of the DGA by encouraging people to consume more plant-based proteins while allowing for greater flexibility to meet the needs of American families. The Committee's evidence-based Report recommends nutrient-dense plant-based foods and meals in American diets—a recommendation that benefits personal nutrition as well as broader public health and food system goals, such as combatting chronic disease. The Departments should adopt this recommended dietary pattern to encourage inclusive and healthful diets for all Americans.

Specifically, we ask the Departments to adopt the following recommendations:

- The Report recommends that the DGA should encourage greater consumption of plant-based proteins, in part by categorizing beans, peas, and lentils as "Protein Foods." The Departments should adopt this recommendation to acknowledge that many Americans already consume these foods as standalone protein sources and as ingredients in plant-based meat and other nutrient-dense protein products.
- The Report calls for more research into the nutritional aspects of plant-based milk and dairy products. The Departments should fund research to determine how these products fit into future iterations of the DGA.
- The Report recommends that future committees examine the relationship between ultra-processed foods (UPF) and health outcomes. Given this Committee's limited findings, the Departments should refrain from issuing recommendations on UPFs in the 2025-2030 DGA, and allocate resources for future research that uses a consistent definition of the term "UPF" and evaluates the health effects of different categories of UPFs. This will allow the Departments to draw meaningful conclusions that help consumers distinguish among types of processed foods.

The remainder of our comment letter describes these points in further detail.

## The DGA should encourage Americans to consume plant-based proteins

The Report recommends a flexible and inclusive dietary pattern<sup>1</sup> that calls for increased intake of beans, peas, and lentils, as well as other plant-based proteins.<sup>2</sup> Beans, peas, and lentils have health benefits as stand-alone whole foods and as ingredients in plant-based meat and other

<sup>&</sup>lt;sup>1</sup> The Report calls this dietary pattern "Eat Healthy Your Way."

<sup>&</sup>lt;sup>2</sup> 2025 Dietary Guidelines Advisory Committee. 2024. *Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture*. U.S. Department of Health and Human Services. <u>https://doi.org/10.52570/DGAC2025</u> (hereinafter "Scientific Report").

alternative protein products. The Departments should include the recommendation to consume more plant-based proteins in the DGA for its individual health benefits and societal benefits.

Plant-based meats are healthy, nutrient-dense sources of protein that contribute to balanced diets. As a recent example, in June 2024 researchers at the University of British Columbia published a literature review which found that plant-based meats generally align with recommendations for improving cardiovascular health due to their low saturated fat and high polyunsaturated fat and dietary fiber.<sup>3</sup> To reach this determination, the review referenced several studies in which participants replaced conventional meat in their diets with plant-based alternatives, resulting in improvements to total cholesterol, low-density lipoprotein cholesterol, apolipoprotein B-100, and body weight.<sup>4</sup>

As another example, a January 2023 meta-analysis of a dozen controlled intervention trials found that consumption of plant-based meat and mycoproteins<sup>5</sup> is associated with lower total cholesterol and other cardiovascular disease indicators.<sup>6</sup> Other studies have found that plant-based proteins can reduce the risk of heart disease,<sup>7</sup> reduce bowel cancer risk,<sup>8</sup> improve gut health,<sup>9</sup> and help with weight maintenance.<sup>10</sup> The Committee's systematic reviews and food pattern modeling analyses further support several of these conclusions, resulting in the Report's recommendation to increase plant-based protein consumption.<sup>11</sup>

These plentiful health benefits contribute to the ability of plant-based proteins to help combat the chronic disease epidemic in the United States. Plant-based proteins can help reduce risks associated with chronic diseases such as heart disease and diabetes, in part because of their high fiber content which helps regulate blood-sugar levels.<sup>12</sup> Plant-based proteins may also prevent

<sup>&</sup>lt;sup>3</sup> M. Negra, ND et al., *Animal vs. Plant-Based Meat: A Hearty Debate*, 2024 CANADIAN J.

CARDIOLOGY 1-12 (2024).

<sup>&</sup>lt;sup>4</sup> Id.

 <sup>&</sup>lt;sup>5</sup> Mycoproteins are proteins derived from biomass fermentation, such as Quorn, Nature's Fynd, and Meati products.
<sup>6</sup> Gibbs & Leung, *The Effect of Plant-Based and Mycoprotein-Based Meat Substitute Consumption on*

Cardiometabolic Risk Factors: A Systematic Review and Meta-Analysis of Controlled Intervention Trials, 2023 DIATETICS 104-22 (2024).

<sup>&</sup>lt;sup>7</sup> Id.

<sup>&</sup>lt;sup>8</sup> Dominic N. Farsi et al., <u>Substituting meat for mycoprotein reduces genotoxicity and increases the abundance of beneficial microbes in the gut: Mycomeat, a randomised crossover control trial</u>, 62 EUROPEAN J. NUTR. 1479-92 (2023).

<sup>&</sup>lt;sup>9</sup> Miguel A. Toribio-Mateas et al., *Impact of Plant-Based Meat Alternatives on the Gut Microbiota of Consumers: A* <u>Real-World Study</u>, 10 FOODS (2021).

<sup>&</sup>lt;sup>10</sup> Jeanne H. Bottin et al., <u>Mycoprotein reduces energy intake and postprandial insulin release without altering</u> <u>glucagon-like peptide-1 and peptide tyrosine-tyrosine concentrations in healthy overweight and obese adults: a</u> <u>randomised-controlled trial</u>, 116 BRITISH J. NUTR. 360-74 (2016).

<sup>&</sup>lt;sup>11</sup> 2025 Scientific Report, Part D, Ch. 10, at 17-29 (summarizing evidentiary support for the Committee's recommendation to increase beans, peas, lentils, and other plant-based proteins).

<sup>&</sup>lt;sup>12</sup> Thaniyath Shahnaz et al., *Food Proteins as Functional Ingredients in the Management of Chronic Diseases: A Concise Review*, 2024 NUTRIENTS 1-15 (2024) at 7.

excessive weight fluctuation because they typically contain relatively few calories and low levels of saturated fat, and high amounts of fiber and protein.<sup>13</sup> This promotes satiety, which can contribute to reduced overall caloric intake. The versatility of plant proteins makes it easy for consumers to incorporate them into diets as stand-alone protein sources, as ingredients in processed plant-based proteins, and as components of salads, smoothies, and other mixed dishes. Due to this flexibility, plant-based proteins can be critical components of dietary strategies to meet Americans' specific needs, including chronic disease management. While research is ongoing, it is clear that plant-based proteins are a sound nutritional choice, and the Departments should adopt the Committee's recommendation to emphasize plant-based protein sources including beans, peas, and lentils in the DGA.

GFI also encourages the Departments to adopt the Committee's recommendation to 1) move beans, peas, and lentils from the "Vegetable" food group to the "Protein" food group and 2) reorganize the "Protein" category to list beans, peas, lentils, nuts, seeds, and soy products at the top.<sup>14</sup> Specifically, we urge the Departments to ensure that the DGA clearly communicates this shift of beans, peas, and lentils to the "Protein" category, as the shift is meant to encourage people to consume more plant-based proteins while maintaining or increasing vegetable consumption. As the Committee notes, this shift "is not recommending that individuals—many of whom do not meet current Vegetables recommendations—decrease vegetable intake, nor is it recommending that all individuals increase protein intake."<sup>15</sup> Rather, the shift is meant to encourage people to get a greater percentage of their daily protein from plants. The Departments should ensure that the wording for this proposed shift will not have the unintended effect of directing people to eat fewer vegetables overall.

GFI supports the Committee's recommendation to emphasize plant proteins not only for their dietary benefits but also because this recommendation acknowledges the cultural relevance that these products already have. The Committee prioritized illustrating how healthy dietary patterns can be adapted for different cultures, religions, dietary preferences, and budgets in the DGA throughout its preparation of the Report, and the Departments should continue this work. Plant-based proteins have long been recognized as excellent sources of nutrition in many communities, and shifting beans, peas, and lentils to the "Protein" food group reflects that. This shift will make the DGA more inclusive to those who choose plant-based proteins due to dietary restrictions such as allergies, intolerances, and religious observances.

Plant-based proteins are also becoming increasingly relevant for their societal benefits related to resource efficiency and economic resilience in the food system.<sup>16</sup> Increased demand for plant-

<sup>15</sup> Id.

<sup>&</sup>lt;sup>13</sup> Id.

<sup>&</sup>lt;sup>14</sup> Id. at Part E, Ch. 1, at 4.

<sup>&</sup>lt;sup>16</sup> Climate Advisers and The Good Food Institute, <u>Why the United States Should Champion Alternative Proteins As</u> <u>A Food and National Security Solution</u> (2022).

based proteins can help build resilience throughout the U.S. food system. Farmers who incorporate plant proteins into their existing operations can do so using less water and land than other expansion tactics may require,<sup>17</sup> and enjoy new sources of income while being cushioned from market fluctuations that impact animal agriculture, such as shocks from inflation, pandemics, and conflicts.<sup>18</sup> The Departments should empower the public to choose plant-based proteins in the DGA in order to help realize these benefits.

Further, plant-based meats benefit public health by reducing the risk of antimicrobial resistance. Plant-based proteins do not require antibiotics for production, meaning they do not contribute to the proliferation of antibiotic-resistant microorganisms.<sup>19</sup> This is critically important for public health. According to the Centers for Disease Control and Prevention (CDC), almost 3 million microbial-resistant infections occur in the United States each year.<sup>20</sup> This microbial resistance can largely be attributed to the use of medically important antibiotics to foster growth and prevent illness in conventional animal meat production.<sup>21</sup> Plant-based proteins present an antibiotic-free alternative to conventional animal products.

The Committee's recommendation to emphasize plant sources of proteins relied on clear evidence that doing so has positive nutrition impacts. To achieve those nutrition impacts for individuals, and to achieve the plentiful societal benefits listed above, the Departments should adopt the Committee's recommendations to emphasize plant-based foods and categorize beans, peas, and lentils as "Protein" in the DGA.<sup>22</sup>

## The Departments should prioritize more research into plant-based milk and dairy products

GFI urges the Departments to prioritize the Committee's recommendation for more research on the various nutritional aspects of plant-based milk and dairy, including those from sources other than soy.<sup>23</sup> While calcium-fortified soy products like milk and yogurt can achieve similar

<sup>&</sup>lt;sup>17</sup> M.C. Heller & G.A. Keoleian, <u>Beyond Meat's Beyond Burger Life Cycle Assessment: A Detailed Comparison</u> <u>Between a Plant-Based and an Animal-Based Protein Source</u>, Ctr. for Sustainable Systems, University of Michigan (2018); H. Richie, <u>If the World Adopted a Plant-based Diet We Would Reduce Global Agricultural Land Use from 4</u> <u>to 1 Billion Hectares</u>, OUR WORLD IN DATA (2021); W. Saerens, et al, <u>Life cycle assessment of burger patties</u> <u>produced with extruded meat substitutes</u>, J. CLEANER PRODUCTION 306 (2021); H. Steinfeld et al., <u>Livestock's</u> <u>long shadow: Environmental issues and options</u>, FAO (2006).

<sup>&</sup>lt;sup>18</sup> Climate Advisors and The Good Food Institute, *supra* note 16.

<sup>&</sup>lt;sup>19</sup> H. Ritchie & F. Spooner, *Large amounts of antibiotics are used in livestock, but several countries have shown this doesn't have to be the case*, OUR WORLD IN DATA (2024).

<sup>&</sup>lt;sup>20</sup> Centers for Disease Control and Prevention, <u>2019 AR Threats Report</u> (2019).

<sup>&</sup>lt;sup>21</sup> H. Ritchie, *supra* note 19.

<sup>&</sup>lt;sup>22</sup> We hope that future versions of the DGA will also include protein foods derived from fungi, algae, and singlecelled microbes, as these nutrient-dense products are becoming more available to consumers.

<sup>&</sup>lt;sup>23</sup> Scientific Report, Part D, Ch. 10 at 15-16.

nutrition to their dairy counterparts, non-soy dairy alternatives can also support a healthy diet.<sup>24</sup> The Departments should consider that dairy and soy are major food allergens, and plant-based dairy products are particularly important for consumers who cannot consume one or both allergens. Determining how plant-based dairy fits into recommended dietary patterns is important to ensure that the DGA are relevant for all Americans, including those who do not or cannot consume cow's milk or soy milk.

Consumers are becoming more interested in plant-based dairy products to meet their needs and preferences.<sup>25</sup> Over the past decade, the plant-based beverage marketplace has grown to be a significant part of U.S. total milk sales.<sup>26</sup> Plant-based milk accounted for approximately 15 percent of total milk dollar sales in the United States in 2023, and nearly 50 percent of all U.S. households purchased plant-based milk that year.<sup>27</sup> Other plant-based dairy products such as yogurt and butter also maintained significant market shares in 2023.<sup>28</sup> To enable consumers who do not consume conventional dairy or soy to choose nutritious dairy alternatives, the Departments should refrain from prejudicing plant-based dairy products in the DGA and prioritize funding and resources to research the nutritional aspects of these products for subsequent guidelines.

The Report states that considering plant-based milk as part of a healthy dietary pattern would require "meaningful guidance on how to select plant-based milks, which are not nutritionally equivalent to cow's milk."<sup>29</sup> However, in healthy dietary patterns for adults, a "nutritional equivalence to cow's milk" requirement for products in the "Dairy" category of the DGA neglects some of the key health benefits of alternative dairy products. Plant-based milk tends to be low in saturated fat, cholesterol, and total sugar, and relatively high in fiber.<sup>30</sup> Many consumers are specifically seeking out those benefits.<sup>31</sup> The fats that alternative dairy products do contain tend to be heart-healthy unsaturated fats.<sup>32</sup> Alternative dairy products also frequently have fewer calories and less sugar than dairy products. For example, 1 cup of cow's milk naturally contains 12g of sugar (contributing 50 calories), while plant-based sources like almonds or soybeans provide minimal (if any) sugar of their own.<sup>33</sup> Plant-based dairy products

<sup>&</sup>lt;sup>24</sup> *Id.*, Ch.3 at 17.

<sup>&</sup>lt;sup>25</sup> Wenfan Su et al., *Consumers' Preferences and Attitudes towards Plant-Based Milk*, FOODS (2023).

<sup>&</sup>lt;sup>26</sup> The plant-based food and beverage marketplace was approximated to be worth \$8.1 billion in the United States in 2023. The Good Food Institute, <u>*The plant-based industry is evolving*</u> (last visited Feb. 10, 2025).

<sup>&</sup>lt;sup>27</sup> *Id.* 

<sup>&</sup>lt;sup>28</sup> Id.

<sup>&</sup>lt;sup>29</sup> Scientific Report, Part D, Ch. 10 at 11.

<sup>&</sup>lt;sup>30</sup> Dawn McKeen, <u>Are Plant Milks Good for You?</u>, N.Y. Times (May 10, 2021).

<sup>&</sup>lt;sup>31</sup> *Id*.

<sup>&</sup>lt;sup>32</sup> Id.

<sup>&</sup>lt;sup>33</sup> 1 cup of 1% low-fat milk contains 12.2g of naturally occurring sugar, and a serving of dairy milk may be 1 cup or more (e.g. a single-serving 12 fluid ounce bottle). *See* USDA Food Data Central, <u>Milk, lowfat, fluid, 1% milkfat,</u> with added vitamin A and vitamin D (2019).

that contribute significant nutrients of value have their place in a balanced diet, and should not be left out of the DGA because they do not meet or exceed every nutrient found in conventional dairy products.

Importantly, the nutrients found in cow's milk can be found across several other food groups. Many fruits and vegetables contain more potassium per serving than cow's milk, and several protein foods provide more vitamin D.<sup>34</sup> Even calcium can be found in equal or greater amounts in some fruits, vegetables, protein foods, and other dairy products, compared with cow's milk.<sup>35</sup> Rather than excluding plant-based milks from a future DGA for their lack of nutritional equivalence to cow's milk, the DGA should focus on ensuring Americans eat well-rounded nutritious diets. To make the DGA work for all Americans, the Departments should facilitate research on plant-based dairy to determine how these products can fit into future iterations of the DGA.

# The Departments should prioritize research that more precisely identifies the health impacts of UPF subcategories

Finally, GFI supports the Committee's calls for more research into ultra-processed foods (UPFs). As stated in the Report, the Committee's findings related to UPFs were limited due to inconsistencies in the available studies, including varying definitions of UPFs, the inability of certain dietary assessment methods to accurately capture UPF consumption, and the lack of available studies on UPFs performed in the United States.<sup>36</sup> Given this limited evidence to support UPF recommendations, GFI filed <u>comments</u> to the Committee in September recommending that it refrain from advising the Departments to warn consumers against all types of UPFs when many consumers rely on these products as accessible sources of nutrition. We hope the Departments will accept the Committee's recommendation to perform and evaluate more UPF research before issuing guidance on these products.

While many UPFs are high in nutrients of concern including saturated fat, added sugars, and sodium, other UPFs are nutrient-dense options that make healthy diets more accessible and affordable. Packaged whole-grain breads are one example of highly processed foods that are an affordable, nutrient-dense, low-sugar source of energy.<sup>37</sup> Similarly, many plant-based products are not properly categorized with other types of UPFs due to their low saturated fat and high polyunsaturated fat and dietary fiber.<sup>38</sup> The Departments should allocate funding for more research to inform guidance on subcategories of UPFs in a future version of the DGA.

<sup>&</sup>lt;sup>34</sup> U.S. Department of Agriculture, <u>Current Dietary Guidelines Food Sources of Select Nutrients</u>, (last visited January 1, 2025).

<sup>&</sup>lt;sup>35</sup> Id.

<sup>&</sup>lt;sup>36</sup> Scientific Report, Part D, Ch. 2 at 26.

<sup>&</sup>lt;sup>37</sup> Id.

<sup>&</sup>lt;sup>38</sup> M. Negra, *supra* note 3.

If the Dietary Guidelines extrapolate to all UPFs the conclusions from studies narrowly focused on products with little nutritional value, consumers will have an inaccurate perception of the entire category of foods. UPFs constitute more than 70 percent of the U.S. food supply and many people purchase processed foods for reasons including cost, efficiency, and personal preference.<sup>39</sup> The majority of Americans, particularly those who are food insecure or have limited access to fresh food products, regularly consume UPFs because such products tend to be widely accessible, and shelf stable.<sup>40</sup> These consumers will not benefit from premature UPF guidance that recommends avoiding the entire category of foods. Rather, categorizing foods as good or bad based on processing alone will make it difficult for these consumers to make informed comparisons between types of processed food products. Any future guidance on processed foods should focus on the impacts of different subcategories of processed foods, so that consumers who rely on packaged foods can accurately determine which products within the UPF category best suit their nutritional needs.

If the Departments advise the public against eating the most pervasive category of foods in the United States based on processing alone, it will only make it harder for people to make informed comparisons between products. The Departments should refrain from issuing guidance on UPFs at this time and instead facilitate more research to better inform consumers about how to distinguish among different types of UPFs so they can choose options that best suit their lifestyles.

## Conclusion

GFI thanks the nutrition experts on the 2025 Dietary Guidelines Advisory Committee for the time and effort they spent examining evidence to draw conclusions about the relationship between diet and health across all life stages. We hope the Departments will incorporate the Committee's recommendation that people should get more of their protein from plant-based sources into the DGA. Not only does that recommendation recognize that plant proteins are a longstanding source of protein for many Americans, but it will also help to improve public health and combat chronic disease throughout the United States.

We support the Committee's calls for more research into plant-based milk and dairy products and ultra-processed foods, and we encourage the Departments to allocate resources for this research in the coming months and years. While the limited evidence on these products makes it infeasible to issue recommendations on plant-based dairy and UPFs in the 2025 DGA, we are

<sup>&</sup>lt;sup>39</sup> Jessica Taylor Price, <u>Has your food been chemically altered? New database of 50,000 products provides answers</u>, Northeastern Global News (May 25, 2022).

<sup>&</sup>lt;sup>40</sup> Cindy W. Leung et al., *Food insecurity and ultra-processed food consumption: the modifying role pf participation in the Supplemental Nutrition Assistance Program (SNAP)*, 116 AM. J. CLIN. NUTR. 197-205 (2022).

hopeful that more research will enable the Departments to communicate how these products fit into a balanced diet in the future.

Finally, we appreciate the Departments' commitment to engaging the public on the DGA. We urge you to include the above-discussed recommendations and to continue to be transparent as you translate the Report into guidelines. We hope our input on the above recommendations will assist the Departments in this process, and we look forward to a continued dialogue on the role of plant-based foods in healthy diets.

Respectfully submitted,

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