



June 15, 2020

The Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

The Honorable Alex Azar
Secretary of Health and Human Services
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Perdue and Secretary Azar:

The National Milk Producers Federation and International Dairy Foods Association commends the 2020 Dietary Guidelines Advisory Committee (DGAC) for its continuing work to provide nutrition guidance to all Americans. We appreciate the fact that the committee has been obliged to undertake an enormous amount of analysis in a compressed period of time.

We would like to reiterate our strong view, as explained more fully in previous comments to the DGAC, that a body of science in recent years has found that dairy foods, regardless of fat level, appear to have either neutral or beneficial effects on chronic disease risks. The DGAC has received extensive comments, including those from the National Dairy Council, that provide references in the peer-reviewed literature to dairy's relationship to beneficial or neutral outcomes for cardiovascular disease, type 2 diabetes and other conditions.

From comments at previous DGAC meetings, it seemed that the committee planned to look specifically at this science and the obvious questions it raises about whether advice to avoid saturated fats regardless of food source is overly broad, given the dense nutrition profile of dairy foods. Milk is a source of eleven essential nutrients and is the top source of nine of these nutrients for children ages 2-18. Milk is also the top source of three of the four nutrients of public health concern for underconsumption. In fact, no other type of food or beverage provides the unique combination of nutrients that dairy contributes to the American diet, including protein, calcium, vitamin D, and potassium. It appears from the DGAC's draft conclusion statements that the broad recommendation to reduce intake of saturated fats regardless of type may well be unchanged in the 2020 scientific report, even though it seems the DGAC has not yet considered the full body of scientific studies that explore whether this recommendation may be too broad.

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The structure of a food can affect the impact of its saturated fat content. Dairy fat is the most complex naturally occurring fat in a food and contains over 400 types of fatty acids. This complexity, which is part of the overall food structure or food matrix of dairy foods, may help explain the beneficial or neutral links between consuming dairy foods, even whole-fat dairy foods, and several chronic diseases.

We are concerned that a number of well-recognized studies appear to have been excluded from consideration based on certain DGAC criteria. We are concerned about the lack of clarity as to which studies were considered in the committee's systematic reviews and to the inclusion and exclusion criteria established for different topics and questions, which may have resulted in the exclusion of valid and well-conducted studies. While several recent dairy-related studies were in fact included, many were not.

Although we commend the committee for posting lists of studies that were included or excluded after a full-text review, information on studies excluded during earlier stages of the process is only available upon request and no contact information is provided.

The intent of this correspondence is to help keep the report on track by bringing to your attention an oversight that can be easily remedied before the final report is released. If the committee concludes its work without coming to any conclusions on the benefits of dairy at each fat level, and instead simply defaults to a recommendation for low-fat and fat-free forms because of a generalized concern about saturated fats in overall dietary patterns, this will represent a lost opportunity to share newer science with consumers, health professionals and policy makers and contribute to ongoing confusion about the healthfulness of dairy. We therefore request the DGAC complete its review by including all relevant scientific studies that bear on these questions and, if the findings so indicate, recommend Americans to incorporate dairy foods in all forms as an integral part of all dietary patterns.

A similar letter has been sent to the chair of the DGAC. Thank you for your leadership in federal nutrition guidance.

Sincerely,



Jim Mulhern
President & CEO
National Milk Producers Federation



Michael Dykes, D.V.M.
President & CEO
International Dairy Foods Association