IDFA
International
Dairy Foods Association

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Designated Federal Officer (DFO)
2020 Dietary Guidelines Advisory Committee
USDA Food and Nutrition Service
Center for Nutrition Policy and Promotion
1320 Braddock Place, Room 4032
Alexandria, VA 22314
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RE: Docket FNS-2020-0015: Dietary Guidelines Advisory Committee Scientific Report and the 2020-2025 Dietary Guidelines for Americans

To Whom It May Concern:

The International Dairy Foods Association (IDFA) appreciates the opportunity to provide comments to the Departments of Health and Human Services and Agriculture regarding the 2020-2025 Dietary Guidelines for Americans (DGAs). The DGAs are crucial to ensuring that Americans make food and beverage choices that lead to healthier outcomes. The DGAs should reflect the state of nutrition science, while also making recommendations that federal nutrition programs and Americans can reasonably implement.

IDFA represents the nation's dairy manufacturing and marketing industry. IDFA members range from multinational organizations to single-plant companies. Together they represent approximately 90 percent of the milk, cultured products, cheese, ice cream and frozen desserts produced and marketed in the United States and sold throughout the world. The diverse membership includes numerous food retailers, suppliers and companies that offer infant formula and a wide variety of milk-derived ingredients. The companies are responsible for supporting and creating more than 3 million jobs that generate $159 billion in wages and deliver an overall impact of $620 billion to the U.S. economy.

Good nutrition is the foundation of health and wellness for adults and children alike, and dairy is a crucial part of a healthy diet beginning at a very young age. In fact, no other type of foods or beverages provide the unique combination of nutrients that dairy contributes to the American diet. The recommendations of the 2020 Dietary Guidelines Advisory Committee (DGAC) along with additional publications reinforce the importance of continuing dairy's vital role in the 2020-2025 DGAs.

IDFA's members are pleased that the 2020 DGAC recognized the important contributions of dairy to health-promoting dietary patterns. We are proud to supply nutritious and well-liked products for both adults and children. However, dairy is still under-consumed by nearly all Americans, meaning that people are missing out on the important nutrition that dairy provides. Recommendations in the 2020-

2025 DGAs can help Americans make food and beverage choices that increase their consumption of dairy and improve nutrition.

The 2020-2025 DGAs Should Be Clear About the Importance of Dairy In Healthy Diets

IDFA applauds the DGAC Scientific Report's numerous recommendations about the importance of dairy in a healthy American diet. We were particularly pleased to see the DGAC acknowledge dairy as an independent food group, including dairy as a core component of eating patterns associated with positive health outcomes and reinforce the importance of consuming three servings of dairy each day.

We urge the Departments to carry these recommendations into the final DGAs.

Dairy Is an Important Unique Food Group

Dairy must stay as an individual food group in the 2020-2025 DGAs due to the unique nutrient package provided by milk and other dairy products. A specific dairy group was identified in the DGAC scientific report, including a variety of dairy products, such as milk, lactose-free milk, yogurt, cheeses, calcium fortified soy beverages, frozen yogurt and dairy desserts.[i] These dairy foods reflect a range of nutrient content, but the core nutrients provided by the foods and beverages in this group are unique from those provided by any other group of foods. The data analysis conducted by the DGAC showed that dairy is among the top sources of calcium, vitamin D and potassium. In addition, dairy products provide other key nutrients to the diet such as phosphorus, vitamin A, riboflavin, vitamin B12, protein, zinc, choline, magnesium, and selenium.

The presence of dairy as a separate food group encourages intake of under-consumed dairy foods and nutrients that support a healthy dietary pattern.

Dairy is a Core Food Group In Healthy Diets

The DGAC report repeatedly identified low-fat and fat-free dairy as a key component of dietary patterns associated with better health outcomes:

> "Common characteristics of dietary patterns associated with positive health outcomes include higher intake of vegetables, fruits, legumes, whole grains, low- or non-fat dairy, seafood, nuts, and unsaturated vegetable oils, and low consumption of red and processed meats, sugar-sweetened foods and drinks, and refined grains."[ii]

Low-fat and fat-free dairy products were included in diets associated with better outcomes related to all-cause mortality, cardiovascular disease, growth, size, body composition and risk of overweight and obesity, bone health, colorectal cancer, and lung cancer.[iii]

This message about the importance of including dairy in healthy diets should be carried forward into the final 2020-2025 DGAs.

Three Servings of Dairy Are Important In a Healthy Diet

The recommended Healthy US-style and Healthy Vegetarian eating patterns specifically included three daily servings of low-fat and fat-free dairy products recommended for most calorie intake levels.[iv] Modeling of these recommended eating patterns demonstrated that 3 daily servings of dairy contribute to a diet that meets the majority of the nutrient needs of most Americans aged 9 years of age and older.

As reinforced by the DGAC, these eating patterns are intended to be flexible to accommodate cultural and taste preferences. This flexibility should include the option to select dairy products with higher milkfat content or with added sugars within the overall recommended limits for the entire diet. This flexibility to accommodate taste preferences could help Americans identify dairy options that they prefer, assisting them in meeting recommended levels of dairy consumption.

Food modeling of diets has demonstrated the difference that three servings of dairy can make to achieving nutrient recommendations. When adequate dairy intake was added to the intake of foods reported in 2007-2010 What We Eat in America NHANES, almost all Americans would meet the Estimated Average Requirement (EAR) for calcium; most groups would meet the EAR for vitamin A; and more adolescent girls and adults would meet the EAR for magnesium.[v] While vitamin D intake would still fall below the EAR, increased dairy does contribute toward recommend levels of intake.

We urge the Departments to continue the recommendation of three servings of dairy each day to ensure that Americans are best able to meet their recommended intakes of a wide range of essential nutrients and to best replicate dietary patterns associated with beneficial health outcomes.

DGAs Should Reflect Scientific Research on the Health Effects of Dairy Fat

We were disappointed that numerous studies related to the health effects of dairy foods at a variety of fat levels were not reflected in the DGAC report, nor apparently considered by the Committee. It is possible that this oversight is due to the compressed schedule for the Committee's Review due to the onset of COVID-19 or the sheer amount of material to review, or both. However, IDFA feels that it is necessary the Departments address the oversight. The DGAC report indicated that there is an important and growing body of evidence on the cardiovascular outcomes related to specific fatty acids, food matrices and specific sources of fat.[vi] This is an important area that should have been considered by the Committee, particularly since there is growing evidence to support a health impact of milkfat that is different from other saturated fats.

The DGAC report referred to the Scientific Review protocol on dietary fat and CVD risk, indicating that for this research question, scientific studies that were included in the Scientific Review measured the types of dietary fats as exposures of interest, while comparators of interest in these studies included sources of dietary fats. However, a number of studies regarding the consumption of dairy products with various levels of milkfat content appear not to have been included or considered. For your reference, the comments IDFA submitted to the DGAC are included below, along with the appropriate scientific references.

> A growing body of emerging research has shown the role of milkfat in the diet and health is different from saturated fats from other sources. The number of studies on dairy at a variety of fat levels has expanded since the scientific review during the 2015-2020 DGA process, making this topic a priority for the 2020-2025 DGA. In fact, the Australian Heart Foundation recently changed their dietary recommendations to include dairy at all fat levels for the general population, while recommending reduced fat varieties for those with high cholesterol.[vii]
>
> Whole milk contains the same nutrients as all other fluid milk, including calcium, phosphorus, protein, vitamins A, D and B12, pantothenic acid, riboflavin and niacin. This is true of other dairy products at all fat levels. While they do have higher levels of saturated fat than low fat versions,

a growing body of evidence indicates that consumption of full fat dairy foods (milk, cheese and yogurt) is not associated with higher risk of negative health outcomes, including obesity, diabetes and heart disease.[viii, ix]

In a summary of multiple studies on full fat dairy foods the researchers found that the evidence indicated no association with high blood pressure, cardiovascular disease, and type 2 diabetes. Some of the studies reviewed actually revealed that full fat dairy was associated with a lower risk of obesity.[x]

Whole milk has more calories than lower-fat varieties, and yet a scientific review concluded that there is no association between high-fat dairy foods and obesity.[xi] In another study, high-fat dairy products were associated with less weight gain.[xii]

Consumption of full fat dairy has been found to be associated with neutral or lower risk of heart disease.[xiii] A meta-analysis of 29 studies indicated that there is no negative effect on heart health of dairy, milk and yogurt, no matter whether those dairy products were full fat or low fat.[xiv] When considering blood markers associated with consumption of full fat dairy, one study[xv] and one meta-analysis[xvi] including data from 13 studies both found that full fat dairy consumption had a neutral impact on risk of heart disease.

A review of the recent science stated: "No long-term studies support harms, and emerging evidence suggests some potential benefits, of dairy fat or high-fat dairy foods …. "[xvii] Another stated, "The present evidence suggests that whole-fat dairy foods do not cause weight gain, that overall dairy consumption increases lean body mass and reduces body fat, that yogurt consumption and probiotics reduce weight gain, that fermented dairy consumption including cheese is linked to lower CVD risk, and that yogurt, cheese, and even dairy fat may protect against type 2 diabetes. Based on the current science, dairy consumption is part of a healthy diet, without strong evidence to favor reduced-fat products; while intakes of probiotic-containing unsweetened and fermented dairy products such as yogurt and cheese appear especially beneficial."[xviii]

There are also a number of other studies regarding health outcomes related to diets with reduced fat or full-fat dairy products that were not apparently considered by the DGAC. These were not specifically excluded by the NESR protocol's exclusion criteria but were apparently not included in the list of studies related to dietary saturated fat and health outcomes that were evaluated by the DGAC.[xix] This body of evidence should be considered and reflected in the 2020-2025 DGAs.

DGAs Should Specifically Allow for Flavored, Sweetened Dairy In a Healthy Diet

Dairy Products with Added Sugars Are Unique

One of the key findings of the DGAC is that dairy is under-consumed by nearly all Americans, meaning that people are missing out on the important nutrition that dairy provides. The moderate levels of added sugars in some dairy products increase palatability, thereby encouraging Americans to eat more of these nutrient-dense foods. Added sugars intake from flavored and sweetened dairy are different from many other products with added sugars. Flavored, sweetened dairy products, such as milk and yogurt, contain the same composition as their unflavored counterparts and count toward the

recommended servings of the dairy group. This stands in contrast to many products with added sugar that are relatively nutrient poor.

However, according to the report, studies on the health effects of sugar sweetened beverages and of the top categories of foods contributing to added sugars intake were used to stand in for all foods and beverages containing added sugars.[xx] Since dairy contributes less than 5% of added sugars to the diets of American adults,[xxi] the studies that were relied upon to make these recommendations did not necessarily take into account flavored/sweetened dairy products.

This is significant because the dietary contributions of sweetened dairy are very different from sugar sweetened beverages or other products that are high in added sugar and low in other nutrients. Flavored and sweetened dairy products, such as flavored milk or yogurt, are an important part of encouraging adequate intake of dairy products, which are under-consumed by most Americans. Flavored milk and yogurt are nutrient dense and provide significant nutritional benefits. As noted, moderate levels of added sugars in these products increase palatability, thereby encouraging Americans to eat more of these nutrient-dense foods. Flavored dairy products contain the same nutrients of their unsweetened counterparts, but with some added sweetener ingredients that can provide a flavor that some consumers prefer, or that provide other functional purposes. Flavored milks, like all cow's milk, are a source of 11 essential nutrients, including calcium, vitamin D and potassium.

Yogurt is a nutrient-dense source of high-quality protein, calcium, potassium, riboflavin, vitamin B12, and phosphorous. Some yogurts have vitamin D added. For many people, added flavors and sweeteners make yogurt more palatable, meaning that they are more likely to reach their recommended levels of calcium, protein, potassium, vitamins A and D and other important nutrients that are present in each serving of yogurt.

<u>Added Sugars Allowance Should Be Used to Encourage Increased Intake of Nutrient-Rich Dairy</u>

The 2020-2025 DGAC report recommends redistributing calories from top sources of added sugars to increased intake of under-consumed nutrient-dense foods and beverages, such as dairy.[xxii]

The 2015-2020 DGAs clearly recognized the role that sweetened and flavored dairy foods and beverages can play in increasing consumption of nutrient dense options and improve nutrient intakes, particularly of under-consumed food groups and nutrients.

Dairy products were specifically mentioned by the 2015-2020 DGAs, "Healthy eating patterns can accommodate other nutrient-dense foods with small amounts of added sugars, such as… fat-free yogurt, as long as calories from added sugars do not exceed 10 percent per day, total carbohydrate intake remains within the Acceptable Macronutrient Distribution Range, and total calories intake remains within limits."[xxiii] The DGAs also states, "Some sweetened milk and yogurt products may be included in a healthy eating pattern as long as the total amount of added sugars consumed does not exceed the limit for added sugars, and the eating pattern does not exceed calorie limits."[xxiv]

Sweetened milk and yogurt can fit into the DGA's recommended eating patterns because the limit on added sugar applies to the pattern as a whole on the diet, not to a single food or beverage. Flavored milk and yogurt are nutrient dense and provide significant nutritional benefits. The moderate levels of added sugars in these products increase palatability, thereby encouraging Americans to eat these

nutrient-dense foods. This recognition and recommendation should be carried forward into the 2020-2025 DGAs.

Dairy is Important for the Nutrition of Infants and Toddlers

With the inclusion of recommendations for all Americans including those up to 24 months in the 2020-2025 DGAs, a greater emphasis is placed on feeding recommendations for the youngest children. We support the widespread recommendations that children up to 6 months be exclusively fed with breastmilk or appropriate infant formula. Given that the majority of infants receive at least some infant formula during the first year of life, it is important that the DGAs support the needs of all infants, parents, and families by providing balanced infant feeding recommendations and information on both breastfeeding and infant formula feeding, particularly recommending against harmful practices such as homemade infant formula.

As infants begin to eat complementary foods in addition to formula and breastmilk, it is important for those foods to align with the recommendations of the DGAC report that dairy foods, such as yogurt and cheeses, should be among the first foods introduced to infants between 6 and 12 months of age.

Consumption of yogurt by infants six months and older is supported by the National Association of Pediatric Nurse Practitioners[xxv] while the American Academy of Pediatrics recommends the introduction of yogurt between the ages of nine and twelve months.[xxvi] The Infant Feeding Guide for WIC includes yogurt in a list of protein-rich foods that are appropriate to introduce to children between the ages of 6 and 8 months of age.[xxvii] These attest to the place yogurt has as a first food for infants over the age of 6 months.

In information for parents, the Centers for Disease Control and Prevention (CDC) recommends pasteurized cheeses and yogurt as foods to encourage for 6 to 24-month old children. Additionally, fortified cow's milk is recommended for children after their first birthday.[xxviii]

In a recent position paper, a number of public health organizations, including the American Academy of Pediatrics, the Academy of Nutrition and Dietetics, the American Heart Association, and the American Academy of Pediatric Dentists, most strongly recommended cow's milk and water be the sole beverages to encourage in the diets of children.[xxix] Milk was cited as such an important part of young children's healthy diets due to its nutrient content and its contributions to healthy diets for young children.

After one year of age, whole milk is the preferred drink for young children. Current governmental guidelines, such as feeding recommendations from WIC[xxx] and regulations for WIC[xxxi] set whole milk and full fat dairy as the preferred options for toddlers between 12 and 24 months of age. This approach was tacitly supported by modeling conducted for toddlers of this age by the DGAC, which used higher fat dairy products, rather than fat free products used in modeling for other age groups.[xxxii] The 2020-2025 DGAs should be clear that toddlers between the ages of 12 and 24 months should consume full-fat dairy products.

The DGAC report commented that it is important to help parents/caregivers understand how to feed their infants/young children. Equally important is to help them understand that because of the rapid growth rate of infants/young children, they should reach out to their baby's healthcare professional if they have any concerns about changes in growth and development. The healthcare professional can

offer more targeted advice on specific feeding strategies and products to address potential nutrient gaps and unique growth requirements, as well as offer specific food and beverage recommendations.

Approaches to Managing Lactose Intolerance Should be Addressed In the DGAs

Our previous comments point to the important nutritional role of dairy foods, such as milk, yogurt and cheese. However, the predominance of lactose maldigestion is a real concern for many Americans, especially among certain sub-groups of the population. Yet, some Americans with lactose intolerance may incorrectly believe that they cannot consume any dairy products.

Avoiding dairy can impact getting enough calcium, potassium and vitamin D—nutrients already lacking in the American diet.[xxxiii,xxxiv] Regarding dairy avoidance, it is important to recognize that yogurt is, for many people, a more easily digestible alternative to milk because, on average, it contains less lactose than milk.[xxxv] In addition, yogurt's live and active cultures continue to have activity in the intestinal tract and may allow lactose intolerant individuals to enjoy dairy products with fewer associated symptoms.[xxxvi]

Natural cheese is naturally low in lactose. For people who choose to not regularly consume fluid milk products because of their lactose content, cheese is an excellent way of obtaining the nutrition of dairy foods. Natural cheeses such as cheddar, colby, monterey jack, mozzarella and swiss contain minimal amounts of lactose, because most of the lactose is removed when the curds are separated from the whey in the cheesemaking process. According to the Institute of Medicine, those with lactose intolerance can rely on cheese as a source of calcium: "... virtually unrestricted amounts of reduced-fat hard cheeses with very low amounts of lactose may be ingested to ensure adequate intakes of calcium."[xxxvii]

A National Institute of Health expert committee urged Americans who think they may be lactose intolerant to get tested before they unnecessarily eliminate dairy foods from their diet.[xxxviii] The 2015 DGAC report recommended low lactose or lactose-reduced dairy products such as lactose reduced milk, yogurt and cheese, as a way for individuals to avoid lactose, yet still obtain the nutritional benefits of dairy.[xxxix]

This advice is doubly important when considering the 2015 DGAC's findings that a diet without dairy is lower in a variety of essential nutrients and that many other products marketed as dairy substitutes do not have the same nutrient package as milk and in fact, many have higher levels of added sugars and calories than cow's milk.[xl]

The National Medical Association has taken a position that the nutrients provided by dairy products are important and that avoiding these products due to a concern about lactose intolerance could lead to negative health outcomes.[xli]

A review points to the link between low intake of dairy due to concerns over lactose intolerance and decreased bone density. This review recommends that consumers with lactose intolerance consume the recommended three servings of dairy in order to avoid nutrient shortfalls and ensure healthy bones.[xlii]

Messages from the 2020-2025 DGAs should also clarify that lactose-reduced dairy options are explicitly included in the dairy group. Based on the nutrient package that is unique to dairy foods and the loss of

nutrients when dairy is not consumed, the 2020-2025 DGAs should encourage yogurt, cheese and lactose-reduced milk as the first choice for lactose intolerant individuals.

DGAs Should Make Recommendations That Will Support Increased Dairy Consumption

We agree with the DGAC report that dairy is an important component of diets that promote good health. Despite the unduplicated nutrient package, nearly all Americans consume too little dairy.

Despite the nutritional benefits, fluid milk product consumption has been declining steadily over the past three decades with annual per capita consumption dropping by 74 pounds from the level of 223 pounds in 1987 to its lowest level of 149 pounds in 2017. Additionally, milk intake has also decreased significantly, based on self-report through the Food Patterns Equivalent Database (NHANES), from a mean of 1.04 cup equivalents in 2007-2008 to 0.75 cup equivalents in 2015-2016.[xliii] Americans should be encouraged to consume more milk and dairy products, including flavored milk, to meet nutrient needs.

The DGAC report identified dairy as an under-consumed food group. In order to help Americans make choices that lead to healthy eating patterns, the 2020-2025 Dietary Guidelines should make up for shortcomings in previous DGAs and make recommendations that encourage increased dairy consumption.

Recommendations Should Be Practical for Americans to Implement

An additional consideration that is important in the DGAs is how to assist consumers in making changes to their food choices and dietary patterns to move toward a healthier diet. In reviewing data on sales of natural cheeses, consumers do not appear to be willing to make a change toward "better for you" cheeses, included low-fat and fat-free cheese. When comparing sales of full fat natural cheese and "better for you" natural cheese, full-fat cheese makes up more than 95% of sales. The trend of sales is moving away from "better for you" options, from 5.8% of natural cheese sales in 2016 to 4.7% of sales in 2018.[xliv] When considered in conjunction with research on full-fat dairy products, recommending reduced-fat versions of cheese may not be the optimal way to help consumers move to a healthier dietary pattern.

Conclusion

IDFA members—from dairy cooperatives to processors—are proud of the wholesome and nutritious dairy products we provide to Americans and appreciate this opportunity to provide input regarding the 2020-2025 DGAs. We believe good nutrition is the foundation of health and wellness for adults and children alike, and dairy is a crucial part of a healthy diet beginning at a very young age. In fact, no other type of foods or beverages provide the range and density of nutrients that dairy contributes to the American diet. We ask the Secretaries to ensure that the DGAs encourage consumption of dairy products in a healthful diet, as supported by the 2020 DGAC Scientific Report.

As the Secretaries consider the content of the 2020-2025 DGAs, we urge the DGAs to emphasize practical dietary changes for Americans to implement that encourage adequate consumption of dairy, including:

- Keep dairy as a stand-alone recommended food group
- Recommend eating patterns that include 3 servings of dairy each day

- Consider recent science on variety of fat levels in dairy and how these can be included into a healthy dietary pattern
- Demonstrate how sweetened dairy products can fit into a healthy diet while increasing intake of dairy and associated nutrients
- Recommend dairy as complementary foods for infants/toddlers
- Recommend strategies for dealing with lactose intolerance

Thank you for considering our comments.

Sincerely,

Joseph Scimeca, Ph.D.

Senior Vice President, Scientific and Regulatory Affairs

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1.04 cup eq. (standard error 0.037) in 2005-2006
0.95 cup eq (SE 0.033) in 2007-2008
1.00 cup eq (SE 0.011) in 2009-2010
0.91 cup eq (SE 0.029) in 2011-2012
0.83 cup eq (SE 0.021) in 2013-2014
0.75 cup eq (SE 0.030) in 2015-2016
Food Patterns Equivalents Database. Agricultural Research Service, United States Department of Agriculture. https://www.ars.usda.gov/northeast-area/beltsville-md-bhnrc/beltsville-human-nutrition-research-center/food-surveys-research-group/docs/fped-data-tables/ Accessed October 11, 2019.