



October 7, 2020

The Honorable George Ervin "Sonny" Perdue III
Secretary of Agriculture
United States Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

The Honorable Alex M. Azar II
Secretary of Health and Human Services
United States Department of Health & Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

RE: 2020-2025 Dietary Guidelines for Americans

Dear Secretary Perdue and Secretary Azar,

The International Dairy Foods Association (IDFA) and our dairy processor members look forward to the release of the 2020-2025 Dietary Guidelines for Americans (DGA) later this year. IDFA represents the nation's dairy manufacturing and marketing industry, which supports more than 3 million jobs that generate \$159 billion in wages and \$620 billion in overall economic impact. IDFA members range from multinational organizations to single-plant companies. Together they represent approximately 90 percent of the milk, cultured products, cheese, ice cream, infant formula and dairy ingredients produced and marketed in the United States and sold throughout the world. The diverse membership includes numerous food retailers, suppliers, cooperatives and companies that offer a wide variety of nutritional dairy products and dairy-derived ingredients.

As the U.S. Departments of Agriculture and Health and Human Services work to finalize the updated DGA, we urge your staff to ensure the recommendations are science-based and achievable so that Americans can realize better health and nutrition. With that in mind, we urge your staff to emphasize certain messages from the 2020 DGAC report as well as others from the 2015 DGA, namely those focused on the importance of dairy consumption, making dairy part of a healthy dietary pattern and guidelines for added sugars. Additionally, we request that the Departments strongly consider including information that was omitted in the official report by the Dietary Guidelines Advisory Committee (DGAC) related to dairy at all fat levels. In summary, we request that your Departments:

1. Recognize the science demonstrating favorable outcomes related to consumption of dairy at all fat levels;
2. Improve recommendations and education to help consumers increase dairy consumption to meet the recommended three servings per day for better overall diet and health; and
3. Ensure the added sugars recommendation is based on total diet rather than individual foods, consistent with 2015 DGA recommendations.

Key Recommendations from the 2020 DGAC Report Should be Affirmed in the Final DGA

Following the review of science, the 2020 DGAC report emphasized the important role of dairy foods in healthy diets. Many of these messages reinforced recommendations from earlier cycles of the DGA. These include acknowledging dairy as an independent food group, including dairy as a core component of eating patterns associated with positive health outcomes and the importance of consuming three servings of dairy each day.

The 2020 DGAC confirmed dairy products as an independent food group due to their unique combination of essential nutrients. Dairy products are nutrient dense, providing a wide range of nutrients, and are among the top sources of calcium, vitamin D and potassium. A diet including low-fat and fat-free dairy, legumes, whole grains, fruits, and vegetables was identified repeatedly by the DGAC report as the eating pattern associated with positive health outcomes. The DGAC report confirmed Americans aged 9 and older should consume three servings of dairy per day as part of both the Healthy US-style and Healthy Vegetarian eating patterns. With the 2020-2025 DGA as the first to include infants and toddlers, the report's recommendation of yogurt and cheese as first foods beginning at 6 months of age and milk at 12 months is notable.

All of these key messages from the 2020 DGAC should be carried forward into the final 2020-2025 DGA. In addition, we urge that USDA and HHS consider including the following info in the 2020-2025 DGA: **Recognize the science demonstrating favorable outcomes related to consumption of dairy at all fat levels.** USDA and HHS should remedy the omission of the many important peer-reviewed scientific studies regarding the consumption of dairy products at various levels of milkfat content which demonstrate the health impact of milkfat that is different from other saturated fats. Importantly, the DGA messages and recommendations should reflect the important and growing body of evidence on the favorable cardio-vascular disease outcomes related to specific types of fatty acids, food matrices and specific sources of fat. In an attachment to this letter, we included a list of these scientific studies that address the health effects of dairy at a variety of fat levels that were not considered during the DGAC process.

Improve recommendations and education to help consumers increase dairy consumption to meet the recommended three servings per day for better overall diet and health. As the DGAC report pointed out, 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 DGA can help Americans make food and beverage choices that increase their consumption of dairy and improve nutrition. These may include identifying a variety of different dairy products, such as milk, yogurt and cheese with different flavors and different nutrient profiles so that all Americans can select the dairy products they most enjoy and will consume. Specific recommendations about the serving sizes of dairy products and information on exactly how much dairy Americans should consume will assist consumer understanding about how much dairy they need.

Ensure the added sugars recommendation is based on total diet rather than individual foods, consistent with 2015 DGA recommendations. The final 2020-2025 DGA should keep the recommended limit of 10% of calories from added sugar that was originally included in the 2015 DGA, rather than reducing the goal to less than 10%. A statement from the 2015 DGA indicated that some added sugars in nutrient-dense products could fit into a recommended diet: "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.”¹ It is important for the DGA to state that the added sugars recommendation is based on the total diet rather than individual foods.

Changes to major recommendations should only be made with scientific support, but there are no studies that demonstrate improved health when intake of added sugars is lowered below 10% of energy. Continuing the 2015 DGA recommendation of 10% of energy from added sugars should allow for a stepwise approach, since most Americans still consume more than 10% of their calories from added sugars. A change in added sugars is also premature since the FDA requirement for added sugar declaration in the Nutrition Facts label is not yet fully implemented and whether this labeling measure could have a favorable effect on consumer choices.

We appreciate the work of the USDA and HHS staff in finalizing the 2020-2025 Dietary Guidelines for Americans. We urge the final DGA to include the following messages:

- Recognize the science demonstrating favorable outcomes related to consumption of dairy at all fat levels;
- Improve recommendations and education to help consumers increase dairy consumption for better overall diet and health;
- Ensure the added sugars recommendation is based on total diet rather than individual foods, consistent with 2015 DGA recommendations;
- Maintain messages confirming low-fat and fat-free dairy is a core component of healthy diets alongside whole grains, fruits, vegetables, and legumes;
- Maintain the separate dairy food group within the DGA;
- Continue to encourage Americans to consume three servings of dairy each day; and
- Maintain messages confirming dairy is an important complementary food for infants and toddlers over the age of 6 months.

Thank you.

Sincerely,



Michael D. Dykes
President and CEO

Cc:

Dr. Eve Essery-Stoody
USDA Center for Nutrition Policy Promotion
Email: eve.essery@usda.gov

Dr. Richard Olson
HHS Office of Disease Prevention and Health Promotion
Email: Richard.Olson@hhs.gov

¹ U.S. Department of Health and Human Services and U.S. Department of Agriculture. 2015-2020 Dietary Guidelines for Americans. 8th Edition. December 2015. Available at <http://www.dietaryguidelines.gov>

Attachment to IDFA Letter: Research related to full fat dairy products and health outcomes

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