



June 30, 2023

Dear Dr. Booth, Dr. Odoms-Young and members of the 2025 Dietary Guidelines Advisory Committee:

We appreciate the opportunity to provide input on the protocols governing systematic reviews to address the scientific questions for the 2025 Dietary Guidelines Advisory Committee (DGAC). Ensuring that all the relevant and valid scientific studies are included in the systematic reviews will lead to dietary recommendations based on the preponderance of the best available nutrition science.

The International Dairy Foods Association (IDFA), Washington, D.C., represents the nation's dairy manufacturing and marketing industry, which supports more than 3.2 million jobs that generate \$49 billion in direct wages and \$794 billion in overall economic impact. IDFA's diverse members make most of the milk, cheese, ice cream, yogurt and cultured products, and dairy ingredients produced and marketed in the United States and sold throughout the world. Safe, nutritious, affordable, and sustainable, dairy foods offer unparalleled health and consumer benefits to people of all ages.

All Protocols

- All protocols excluded meta-analyses from inclusion in the systematic reviews. While meta-analyses do use data from previously published studies, additional analysis is conducted as part of the process that may be a useful contribution to a systematic review. This is particularly helpful by pooling data that can permit more precise analysis of health outcomes. If there is concern about the strength or bias of individual meta-analyses, these concerns should be addressed in the same manner as for other study designs. A properly conducted meta-analysis will exclude those studies that fail to satisfy proper design criteria. If the DGAC decides to exclude meta-analyses from the systematic reviews, it will be important to ensure that the individual studies that are part of the excluded meta-analyses and which are valid and robust, are considered for inclusion in the DGAC systematic review.
- Protocols set an end date of May 31, 2023 for studies to be included in the appropriate systematic review. This is a significant departure from past practice, when studies were included that were published closer to the publication of the DGAC scientific report. Shortening the timeframe now has the potential to exclude ongoing studies that were scheduled to meet the expected end date of May 31, 2024.

Dairy Milk and Milk Alternatives and Growth, Body Composition, and Risk of Obesity: A Systemic Review Protocol

Dairy Milk and Milk Alternatives and Risk of Type 2 Diabetes: A Systematic Review Protocol

- In addition to considering dairy milk with different levels of sugar and fat content, we urge the protocol to specifically include consumption of lactose-free and low-lactose milk as criteria for both intervention/exposure and as a comparator in studies that will be included in the systematic review.
- We recommend that there be separate consumption of dairy milk and milk alternatives as intervention/exposure criteria in the included studies. While a few milk alternatives have similar levels of some nutrients to dairy milk, many milk alternatives have different nutrient profiles than dairy milk or other milk alternatives. While all these products should be considered as far as health outcomes and role in healthy eating patterns, they must be considered separately in order to properly understand if there are any differences among the milk alternative products and dairy milk.
- As part of examining the dietary contributions of various beverages, we urge the addition of comparisons between dairy milk and milk alternatives intake, dairy milk compared to sugar sweetened beverages and dairy milk compared to 100% fruit juice.
- Since these protocols are written to examine the health effects of consuming fluid dairy milk, it will also be important to ensure that other dairy products, such as yogurt and cheese, and the dairy group as a whole are considered in other appropriate protocols, such as those that consider the entire eating pattern.

Ultra-processed Food Dietary Patterns and Growth, Body Composition and Risk of Obesity: A Systematic Review Protocol

- A major limitation of current food processing classification systems is that they group nutrient-dense foods, such as yogurt or whole wheat bread, as Ultra-Processed Foods (UPF) without regard for the effect of the food on health outcomes. With demonstrated difficulties in assigning processing categories,ⁱ Astrup points out that there are “several nutrient-dense, healthy foods that are classified as UPFs.”ⁱⁱ Many of these foods provide essential nutrients to eating patterns and contribute to better health outcomes. For example, the intake of fermented food such as yogurt is associated with reduced risk for Type 2 Diabetes Mellitus, several types of cancers, and obesity, yet by some classifications can be viewed as UPF.
- Studies to be included under this protocol must clearly describe the eating pattern and consumption behavior, particularly the specific foods, the methods of processing (if any) and amounts consumed. Without a consistent definition for “ultra-processed” and with various systems for identifying the level of food processing, it will be important for the dietary patterns to be very clearly described so that the science can be compared and contrasted accurately. Additionally, the protocols should include a systematic way to review data from available databases currently used for categorizing the degree of food processing to ensure that results will be consistent.

Dietary Patterns Consumed and Growth, Body Composition and Risk of Obesity: Protocols Addressing Nutritional Needs of Older Adults

- Protocols should include studies specifically addressing the nutritional needs in older adults (age 65+ years), especially protein consumption and needs, that are not included specifically in other protocols. Older adults not meeting protein recommendations may also have lower diet quality, so as protein needs are considered so should consumption of key micronutrients such as zinc, selenium, Vitamin C and Vitamin D.

All Protocols Addressing Eating Patterns

- Protocols should include research that looks at specific food groups as part of eating patterns, including dairy overall and especially yogurt and cheese consumption that are not included specifically in other protocols. As the dairy food group is considered, special attention should be paid to lactose-free and low-lactose dairy products.

Scientific Question: What is the relationship between food sources of saturated fat consumed and risk of cardiovascular disease?

IDFA is pleased that one of the scientific questions slated for systematic review relates to specific food sources of saturated fat. However, as of June 30, 2023, the proposed protocol for addressing this question is not yet available for public review. While we understand that the DGAC has numerous protocols to develop, this is a very important question that was highlighted in the future directions section of the 2020 DGAC scientific report. We urge the DGAC to release the protocol as soon as it is available and to allow for a similar amount of time to comment as provided for the other protocols.

In order to properly answer the proposed question, the DGAC will likely need to review single food studies and these studies should be included in the protocol. The exclusion of single food studies was a primary reason that many studies on saturated fat in dairy were previously excluded. Including these studies will permit the 2025 DGAC to review the entire body of science exploring the relationship between dairy foods at all fat levels and health outcomes.

We commend the DGAC for their quick work on a variety of important nutrition issues to be addressed by the 2025-2030 DGA. We appreciate the ability to comment on the proposed protocols and look forward to submitting additional information relevant to the scientific questions.

Sincerely,



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Senior Vice President
Regulatory and Scientific Affairs

ⁱ Braesco, V., Souchon, I., Sauvant, P. *et al.* Ultra-processed foods: how functional is the NOVA system?. *Eur J Clin Nutr* 76, 1245–1253 (2022). <https://doi.org/10.1038/s41430-022-01099-1>

ⁱⁱ Astrup, C A Monteiro, Does the concept of “ultra-processed foods” help inform dietary guidelines, beyond conventional classification systems? NO, *The American Journal of Clinical Nutrition*, Volume 116, Issue 6, December 2022, Pages 1482–1488, <https://doi.org/10.1093/ajcn/nqac123>