



**Comments by Roberta Wagner, Senior Vice President, Regulatory and Scientific Affairs,
International Dairy Foods Association to the**

2025-2030 Dietary Guidelines Advisory Committee

September 12, 2023

Good afternoon. I am Roberta Wagner, Senior Vice President for Regulatory and Scientific Affairs at the International Dairy Foods Association.

IDFA represents companies that make most of the dairy products and ingredients marketed in the United States and throughout the world contributing more than \$790 billion in overall economic impact.

IDFA believes that because the Dietary Guidelines for Americans (DGAs) serve as the foundation for all federal governmental nutrition policies, it is critically important that they reflect the most current reputable body of nutrition science, and all governmental nutrition policies and programs must align with this science.

IDFA's brief comments today address the following questions under consideration by Subcommittee 1:

The relationship between

- Dietary patterns and various health outcomes.
- Dairy milk consumption, body composition and the risk of obesity.
- Food sources with saturated fat and risk of cardiovascular disease.
- The impact of dietary patterns with varying amounts of ultra-processed foods on body growth and composition.

Nutrient-rich dairy products, including full-fat, lactose free and flavored products provide up to 13 essential nutrients, including three of the four under-consumed nutrients of public health concern identified in the 2020 DGAs: calcium, vitamin D and potassium. Focusing on nutrient-rich foods such as dairy, should remain a foundational tenet of the DGAs.

An overwhelming body of scientific evidence demonstrates that dairy should be part of healthy eating patterns for all Americans, at all life stages and with various dietary needs. The DGAs have long recognized the inherent benefits of dairy products, including milk, yogurt and cheese, as important sources of nutrients and associated with better health outcomes.

IDFA's members make a myriad of dairy products that are widely available and affordable for most Americans, including products that are shelf stable, lower in lactose, sodium, added sugar and saturated fat. Recent studies show that for both adults and children dairy milk and yogurt consumption, including full fat and 2% milk and flavored and unflavored milk, is not associated with increased adiposity or risk of obesity. At a time when people are not meeting DGAs recommendations for dairy, deterring intake due to fat level is not science based nor is it in the best interest of public health.

Dairy products are widely available with various milkfat contents ranging from fat free to full fat products. While the DGAs currently emphasize the consumption of low fat and fat free options, IDFA eagerly anticipates a review of the expanding scientific evidence demonstrating that consumption of dairy products, including full fat products, is not tied to an increased risk of cardiovascular disease. By expanding the variety of dairy products that are recommended for consumption to Americans, we may narrow the gap between recommended servings and current intake. For example, adolescents on average consume 1.6 to 2 servings of dairy per day, well below the recommendations of 3 servings per day. We urge the Committee to release the protocol for the systematic review of food sources with saturated fat so appropriate scientific studies can be shared to inform the Committee's recommendations.

In some cases, nutrient-rich dairy options may undergo further processing to ensure food safety, improve palatability or add convenience for consumers. As the Committee looks at the science regarding dietary patterns that include ultra-processed foods, it is important to establish a consistent definition of the term and to delineate the effects of processing on the nutrient content of the food.

We appreciate your time and will submit additional information in our written comments.