August 13, 2020

USDA Food and Nutrition Service
Center for Nutrition Policy and Promotion
1320 Braddock Place, Room 4032
Alexandria, VA 22314

Re: Docket No. FNS-2020-0015; Comments on the Scientific Report of the 2020 Dietary Guidelines Advisory Committee

Edge Dairy Farmer Cooperative (Edge) and its over 800 Midwestern dairy farmer members appreciate the opportunity to comment on the development of the next Dietary Guidelines for Americans (DGA). We understand the essential role the DGAs play in the health and wellbeing of Americans. As producers of nutritious food, we strongly believe in dairy's ability to satisfy dietary needs across all age groups, dietary regimes and eating habits.

For decades, the DGAs have limited recommended dairy foods to only fat-free and reduced-fat, but now science has shown fuller-fat dairy foods should also be recommended. Edge is disappointed the Scientific Report failed to include the evolving literature on this topic. As USDA and HHS work to finalize the dietary guidelines for the next five years, we urge the agencies to incorporate the available research on higher fat dairy foods and the role they could play as part of a healthy diet.

Over the past few years, the general trend is Americans are becoming more aware of their eating habits and dietary choices. This includes following fad diet programs and trying new food and beverage products, but also challenging the longstanding notions of what is healthy. Research regarding high fat milk and dairy foods is now doing the same. Future DGAs need to recognize that, but unfortunately the recent scientific report does not. We feel the inclusion of this research on how high-fat dairy helps the next DGAs meet the guiding principles identified from the 2015-2020 Dietary Guidelines for Americans.[1]

Since the development of the current DGAs, new research has discussed the neutral and positive attributes of dietary saturated fat and full-fat dairy products. This includes new information on full-fat dairy's association with particular health risks, especially those pertaining to cardiometabolic health and the perceived contribution to obesity. The scientific report's restrictive notion of saturated fat narrowly defines the view of full-fat dairy products outside of their complete nutritional context. Researchers have pointed out the physical and nutritional makeup of foods and beverages should be viewed as a whole.[2] Due to this, at least one recent comprehensive review of available research concludes by discounting the recommendation to restrict or eliminate full-fat dairy from the diet as the optimal strategy for reducing cardiometabolic risk.[3] While the current DGAs and the scientific report treat this as an accepted premise, such strong contrary evidence should have also been reviewed by the committee and included in the report.

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[1] Dietary Guidelines Advisory Committee. 2020. Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Agriculture and the Secretary of Health and Human Services (Scientific Report). U.S. Department of Agriculture, Agricultural Research Service, Washington, DC.

[2] Astrup, Nina Rica Wium Geiker, Faidon Magkos, Effects of Full-Fat and Fermented Dairy Products on Cardiometabolic Disease: Food Is More Than the Sum of Its Parts, *Advances in Nutrition*, Volume 10, Issue 5, September 2019, Pages 924S–930S, https://doi.org/10.1093/advances/nmz069.

[3] *Ibid.*

In addition to the new material on cardiometabolic health, the most crucial evidence missed by the committee and not included in the scientific report is newer available literature on higher fat dairy products health effects on children, particularly related to child obesity levels. Edge and our members strongly believe any updated dietary guidelines need to account for this because of DGAs influence on the National School Lunch Program and the available milk options for school-aged children.

In recent years, we have seen milk options in schools greatly reduced while, at the same time, the availability of other beverages, particularly those with high amounts of added sugar, has increased. Beverages make up a large proportion of a child's caloric intake and therefore, the current DGAs recommend that beverages need to also be evaluated in light of both overall calories the available nutrient content.[4] Milk can fulfill these two elements while other beverages common in our schools cannot. However, fuller-fat milks are discounted in the current DGAs and scientific report because milk's saturated fat contribution to calories and overall obesity rates. Newer research is overturning this notion. For example, a recent comprehensive systematic review identified multiple studies that tell us changing from whole milk to reduced-fat or skim milk varieties did not result in changes to measures of obesity or adiposity.[5] From that, the reviewers concluded "that dietary recommendations to limit consumption of whole-fat dairy products in children are not supported" by the existing evidence to significantly impact child adiposity levels.[6] Unfortunately, the committee did not include the breadth of this newer beneficial research in the final scientific report.

As children develop lifelong eating patterns from an early age and notably in the school setting, the DGAs would be well suited to include this newer research to directly help fulfill guiding principles such as developing and maintaining healthy eating patterns and helping individuals shift to healthier food and beverage choices.

Even though Edge is disappointed on the lack of inclusion of a wider variety of dairy products, we do support the scientific report's renewed recommendations that recognize the important nutritional qualities of fat-free and low-fat milk and other dairy foods for Americans to maintain a healthy diet. These key recommendations cannot be understated as the comprehensive nutritional profile of milk and dairy foods help Americans consume adequate amounts of key nutrients. Several of which, like potassium, calcium, and vitamin D, are key nutrients that the current guidelines report as under consumed.[7] There are important conclusions identified in the scientific report that we urge the agencies to include in the next dietary guidelines:

- Maintaining dairy as a separate food group without the inclusion of nutritionally inferior plant based imitation products.
- Continuing to recommend three servings of dairy daily for healthy U.S. style and vegetarian food patterns and two servings dairy for Mediterranean style food patterns.
- Recommending dairy foods to be introduced as healthy supplemental foods for infants and toddlers.

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[4] Scientific Report. & U.S. Department of Health and Human Services and U.S. Department of Agriculture (HHS-USDA). 2015-2020 Dietary Guidelines for Americans. 8th Edition, December 2015. Available at http://health.gov/dietaryguidelines/2015/guidelines/.

[5] Therese A O'Sullivan, Kelsey A Schmidt, Mario Kratz, Whole-Fat or Reduced-Fat Dairy Product Intake, Adiposity, and Cardiometabolic Health in Children: A Systematic Review, *Advances in Nutrition*, Volume 11, Issue 4, July 2020, Pages 928–950, https://doi.org/10.1093/advances/nmaa011.

[6] *Ibid.*

[7] HHS-USDA.

The current guidelines, the scientific report, and several leading nutritional organizations all agree that milk and dairy foods have a well-rounded and complete nutritional profile.[8] Each of these inclusions in the dietary guidelines have played and will continue to play a critical role in promoting healthy eating patterns across all age groups and socio-economic statuses.

On behalf of our dairy farmer members, Edge thanks the committee for their important work to produce a scientific report inclusive of several recommendations that continue to incorporate dairy as an important part of a healthy diet. As the agencies finalize the next dietary guidelines, Edge strongly urges USDA and HHS to build on the report by considering additional research and new available material on higher fat milk and other dairy foods' ability to further the principles set forth in the dietary guidelines process. Edge appreciates the opportunity to address the scientific report by providing these comments to USDA and HHS as this matter is highly important to the dedicated dairy farmers who produce dairy products.

Sincerely,

Aaron Stauffacher
Associate director of government affairs

[8] https://www.usdairy.com/getmedia/6e4d08d1-5bf5-4f43-b84a-c90aa13eea5f/3%20servings%20of%20dairy%20every%20day%20statement_ndc.pdf.pdf.aspx