



January 9, 2020

Kristin Koegel
USDA Food, Nutrition and Consumer Services
Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

RE: Docket FNS-2019-0001-6698

Dear Ms. Koegel and DGAC members:

Dairy Council of California appreciates the opportunity to submit comments for consideration by the 2020 Dietary Guidelines Advisory Committee (DGAC) in response to the Federal Register Notice 2019-12806 (Docket: FNS-2019-0001) issued June 18, 2019.

Dairy Council of California is a nutrition education organization who has championed community health for more a century. The organization empowers stakeholders, including educators, health professionals and community leaders, to elevate the health of children and families through the pursuit of lifelong healthy eating habits. Funded by California's dairy farm families and local milk processors and under the guidance of California Department of Food and Agriculture, Dairy Council of California's portfolio of complementary nutrition education resources, which includes science-based nutrition curriculum and programs, Mobile Dairy Classroom assemblies, professional development training programs and online resources, educate millions of students and families each year in California and throughout the United States.

The evidence provided in this public comment is related to these topics and scientific questions identified for examination by the DGAC:

- The relationship of dietary patterns and beverage consumption on growth, size, body composition and risk of overweight and obesity.
- The relationship between dietary patterns consumed during pregnancy and micronutrient status.
- The relationship between complementary feeding and micronutrient status and growth, size and body composition.

EVIDENCE FOR THE DGAC TO CONSIDER

Dairy foods play an important role in plant-based, sustainable eating patterns.

Scientific research confirms that milk, yogurt and cheese offer a unique package of nutrients—calcium, vitamin D, potassium and more—working together to provide multiple health benefits, including optimal growth and development in children and reduced risk of chronic diseases such as type 2 diabetes and heart disease among adults.

New studies are starting to demonstrate a beneficial effect of whole dairy foods—particularly fermented dairy foods such as yogurt, cheese and kefir—on metabolic health, body weight and chronic disease risk. This may be due to dairy foods' structure of nutrients that interact in unique ways to facilitate digestion, absorption and synergy with other nutrients and bioactive compounds within the body.¹ This holistic view of the food matrix can be defined as the interconnectedness of the many nutrients that make up a specific food, which then controls the delivery and bioavailability of the nutrients within the human body.²

Dairy foods offer health attributes that are different from plant-based and other animal-source foods, playing an integral role in supporting overall health. Many Americans continue to underconsume dairy, vegetables and fruits, resulting in nutrient gaps.³ Encouraging consumption of nutrient-dense foods from both plant-based and dairy sources can help close the nutrient gaps that exist among Americans of all ages. The wide variety of available milk and dairy foods provides many options to meet personal needs, tastes and preferences.

Alongside obesity and chronic disease is the interrelated issue of food insecurity, which serves as a reminder that solving complex public health problems requires a broad range of solutions and a zealous application of credible science. From that perspective, nutrition recommendations and healthy eating guidance should be viewed through the lens of whole foods and, ultimately, healthy eating patterns as the optimal way to obtain nutritional adequacy while supporting the health of both people and the planet.

Access to wholesome foods like dairy, vegetables, fruits, whole grains and lean protein is important to ensure children and families have the nutrients needed for optimal health. As plant-based eating patterns and sustainable diets become further defined, it is critical to utilize the totality of evidence-based nutrition research, which continues to demonstrate the health-promoting benefits of a balanced eating approach that includes nutrient-dense plant and animal choices and embraces the specific nutrient needs of individuals, diverse cultures and economies.

Caution should be exercised to ensure that guidance supportive of plant-based, sustainable eating patterns does not unnecessarily narrow nutrient-dense food options like milk and dairy foods in recommendations for individuals.

Milk and dairy foods offer a unique package of nutrients essential for optimal health, growth and development in children and adolescents.

Dairy milk, in comparison to plant-based alternative beverages, offers the most balanced distribution of energy from carbohydrates, protein and fat; and coupled with its unique nutrient package, dairy milk can be difficult to replace in a healthy dietary pattern.⁴ Young children who do not meet the daily recommended servings of dairy milk, yogurt or cheese may have inadequate intakes of important nutrients and protein necessary for optimal growth and development. Nationally representative data of children show that as consumption of nutrient-dense beverages, including milk and 100% juice, sharply declines with age, consumption of sugar-sweetened beverages increases.⁵ Key nutrients for children's health obtained from milk are potentially being displaced by sugar-sweetened beverages, likely contributing to the health issues commonly affecting children, including obesity and dental caries. Furthermore, higher consumption of milk, water and 100% juice is associated with better overall diet quality among U.S. children when compared with children in the lowest quartile of intake.⁶

Milk is an important source of essential nutrients that contribute to overall health in children's eating patterns, but by age 6 most children are not meeting the recommended daily servings from the dairy food group.⁷ Poor eating patterns, especially in early childhood, can continue as habits in adulthood, increasing the risk for becoming overweight and developing chronic conditions such as heart disease. Consuming the recommended amount of dairy foods would go a long way in meeting nutrient requirements that support healthy growth and development, especially nutrients of concern such as calcium, vitamin D, magnesium and vitamin A.⁸

Access to Nutritious and Wholesome Foods is Essential to Helping Children Reach their Full Health Potential

There is compelling evidence linking food insecurity to poor health outcomes,⁹ heightening health sector urgency to seek solutions to close this gap. Recommendations put forward to improve healthy eating serve as a catalyst for changes in public policy that may ultimately determine the food choices available to the most vulnerable populations through nutrition assistance programs. One example of this critical safety net is school meal programs. Research suggests that eating school breakfast and lunch is associated with healthier dietary intakes among U.S. schoolchildren, particularly increased intakes of fruits and vegetables, whole grains and dairy.¹⁰ Additionally, student consumption of breakfast—specifically the fruits, vegetables and dairy products made readily available in school meal

programs—is associated with improved academic and health outcomes among children and adolescents.¹¹

While there is more than one way to meet dietary needs for individual nutrients such as protein and calcium, the amount and variety of foods that must be consumed to match the nutrition package and affordability provided by dairy milk may be difficult to achieve for many children, especially those who experience food insecurity. The decline in milk consumption in children warrants concern for nutritional inadequacy. With many children and adolescents being overweight and undernourished, access to nutritious and wholesome foods, as well as nutrition education, is essential to help children reach their full health potential as adults.

Recommendations for the public that generally restrict or eliminate animal protein without focusing on the whole food matrix or healthy eating patterns could unintentionally limit access to and consumption of nutritious, nutrient-rich foods like milk and dairy foods. Ensuring that public health nutrition guidance continues to be evidence-based makes it easier to create opportunities for children and families to access nutritious foods in the communities where they live, learn, work and play.

Early childhood is a key opportunity to establish healthy dietary patterns, impacting growth and development in the short term as well as eating habits later in life.

After decades of increases, the national childhood obesity rate has held relatively stable in recent years. Yet childhood obesity rates remain at a historic high, putting millions of young people at greater risk for serious health conditions, including high blood pressure, type 2 diabetes, heart disease and asthma. Obesity rates rise with age, and there are significant inequities in rates, particularly affecting black and Hispanic youth. According to the Robert Wood Johnson Foundation *State of Childhood Obesity* report released in October 2019, the United States spends \$14 billion annually on childhood obesity alone.¹²

Obesity is strongly linked with chronic diseases such as type 2 diabetes and heart disease. When children develop these conditions they are at risk for a lessened quality of life and a shorter life expectancy. The ability to prevent the onset of these diseases at a young age is of extreme importance. Researchers have identified that careful management of diet and lifestyle in pre- and perinatal periods could make considerable impact on the obesity epidemic for years to come. For example, children's risk for obesity is lowered if their mother maintains a healthy weight during pregnancy and consumes a healthful eating pattern. Numerous studies suggest that dairy consumption in children is linked to improved insulin response, better glucose control and weight management.^{13,14} Equally important as preventing chronic disease is supporting optimal cognitive development. Maternal prenatal consumption of appropriate levels of dairy foods and early diet quality influence future health outcomes. Several studies are looking at prenatal iodine levels and

brain development, positively positioning milk as a significant delivery mechanism of iodine for pregnant women.^{15,16}

Exposing infants and toddlers to nutritious foods and beverages from the start also plays a critical role in their long-term health. Research shows that what children drink—from birth through age 5—can have a big impact on their health since beverages make a significant contribution to dietary intake during this critical period. However, with expanding numbers of beverage choices available in the marketplace, it can be confusing for parents and caregivers to know which drinks are healthy and which ones to avoid.

Given the importance of beverage consumption in early childhood and the need for comprehensive and consistent evidence-based recommendations, Healthy Eating Research, a national program of the Robert Wood Johnson Foundation, released a consensus statement in September 2019 in collaboration with key national health and wellness organizations, including the Academy of Nutrition and Dietetics, the American Academy of Pediatrics, the American Academy of Pediatric Dentistry and the American Heart Association. The report, *Healthy Beverage Consumption in Early Childhood*, outlines comprehensive recommendations for beverage consumption consistent with a healthy diet for children from birth to age 5. Among the recommendations, dairy milk is recognized as a common, familiar beverage in U.S. diets that is widely available, affordable and nutrient-dense.

Milk and dairy foods offer a unique package of nutrients essential for optimal health, growth and development. Establishing healthy eating patterns especially among those most vulnerable, including young women of child-bearing years, pregnant women, infants and young children, is a key component of obesity prevention efforts. For these reasons, Dairy Council of California strongly recommends that the Dietary Guidelines for Americans includes milk and dairy foods as an essential component of healthy dietary patterns across the life span.

Thank you for the opportunity to submit these comments.

Regards,



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