



August 5, 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-2020-0015

Dear Ms. Koegel and Secretaries of USDA and HHS:

Dairy Council of California appreciates the opportunity to submit comments for consideration by the Departments of Agriculture (USDA) and Health and Human Services (HHS) on the Scientific Report of the 2020 Dietary Guidelines Advisory Committee (the Advisory Report).

Dairy Council of California is a nutrition education organization who has championed community health for more than a century. The organization empowers and collaborates with 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 milk processors and under the guidance of California Department of Food and Agriculture, Dairy Council of California's nutrition education resources, which includes science-based nutrition curriculum and programs, educate millions of students and families each year in California and throughout the United States. Dairy Council of California also provides expertise and technical assistance to federal feeding programs in California to help ensure vulnerable populations have access to healthy food.

Today, people are more concerned than ever about their health and well-being. The global COVID-19 pandemic has created a sense of anxiety and brought to light the alarming disparities that exist in the U.S. healthcare system. While COVID-19 poses a greater threat to those with chronic conditions such as obesity, type 2 diabetes, and heart disease, the physical isolation and increasing unemployment rates are exacerbating rates of food insecurity. Nutrition and access to food play an important role in protecting the health of people across the lifespan, regardless of current health or nutritional status. For these reasons, the Dietary Guidelines for Americans (DGAs), which provide guidance to help



Americans eat a healthier diet and serve as the foundation for federal meal programs that increase access to nutritious food for vulnerable populations, are especially relevant and timely.

Reaffirming Dairy's Role in Healthy Eating Patterns Across the Lifespan

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.

The Advisory Report rightfully continues to classify dairy as its own food group, validating the important role dairy foods have in the three recommended eating patterns carried forth from the 2015–2020 DGAs: Healthy U.S. Style, Healthy Vegetarian and Healthy Mediterranean-Style. We support the Advisory Report in ensuring that low-fat and fat-free dairy foods are recommended for all Americans ages 2 and older, that milk, cheese and yogurt are recommended for toddlers 12–24 months, and additionally recognize yogurt and cheese as complementary feeding options for infants 6–12 months.

The Advisory Report reinforces the important role dairy foods play in eating patterns across the life span, and the unique package of nutrients dairy foods like milk, cheese and yogurt contribute in the American diet, that would otherwise be under-consumed. In a review of dietary patterns and health outcomes in adults, the Dietary Guidelines for Americans Committee (DGAC) concluded that consuming low-fat dairy foods as part of a healthy dietary pattern was associated with beneficial impacts on all-cause mortality, cardiovascular disease, growth, size and body composition, bone health, colorectal cancer and lung cancer.

Recommendation: Dairy Council of California strongly recommends that the Dietary Guidelines for Americans include milk and dairy foods as an essential component of healthy dietary patterns across the life span.

Early Childhood: A Key Opportunity to Establish Healthy Dietary Patterns

Nutrition during the first 1,000 days has far-reaching impacts on a child's ability to succeed in school and life, and greatly influences their health outcomes as they grow older, including their likelihood of having a chronic disease. Introducing infants and toddlers to



nutritious foods and beverages from the start plays a critical role in their long-term health. Milk's unique nutrient package can be difficult to replace in a healthy dietary pattern, especially for growing and developing children. Research shows that what children drink from birth through age 5 can have a significant impact on their health due to the fact that beverages make a significant contribution to dietary intake during this critical period.

Nationally representative data of children show that as consumption of nutrient-dense beverages, including milk and 100% juice, sharply declines with age, while consumption of sugar-sweetened beverages increases.¹ Key nutrients that children obtain 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.²

Recommendation: Dairy Council of California applauds DGAC's focus on the positive and negative role that beverages play in meeting nutrient and food group intakes and supports the Committee's recommendations regarding the inclusion of milk and 100% fruit juice in healthy eating patterns for children.

Milk and dairy foods offer a unique package of nutrients that are essential for optimal health, growth and development. Young children who do not meet the daily recommended servings of dairy milk, yogurt or cheese may have inadequate intakes of important nutrients, such as calcium, vitamin D, and potassium, nutrients of concern identified in both the Advisory Report and the 2015–2020 Dietary Guidelines. The Advisory Report acknowledges that there are opportunities to think about healthy food intake patterns that should be carried forward into each subsequent stage of life. This approach acknowledges that although nutrient needs vary over the lifespan, early food preferences influence later food choices. Establishing healthy eating patterns for infants and young children is a key component of chronic disease prevention efforts and health promotion.

Recommendation: Dairy Council of California supports the importance of addressing nutritional needs through a life stage approach that includes pregnancy, lactation, birth-to-24-months, childhood, adolescence and adulthood.

Access to Nutritious Foods and Comprehensive Nutrition Education Programs Are Essential to Helping Children Reach Their Full Health Potential

The issues of food insecurity and economic inequality continue to burden families in the United States and are being more deeply felt by vulnerable communities. This is reflected by the more than 14 million households who are currently struggling to put food on the table, showing that food insecurity remains a major issue in the United States.



Furthermore, rates are disproportionately higher for households with children, families living in rural communities, Hispanics and African Americans.³ These issues contribute to increased levels of obesity and chronic diseases in vulnerable populations and negatively impact the growth and development of children.⁴

There is compelling evidence linking food insecurity to poor health outcomes,⁵ heightening health sector urgency to seek solutions to close this gap. Recommendations to improve healthy eating serve as a catalyst for changes in public policy that may ultimately determine the food choices available to vulnerable populations through nutrition assistance programs. 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 indicated in the Advisory Report, it is critical to consider the social, environmental and economic contexts that impact dietary patterns and health. There is a need to leverage existing federal nutrition assistance programs such as the National School Lunch Program and the Special Supplemental Nutrition Program for Women, Infants, and Children to provide access to healthy foods. Further research is warranted through the DGA process to ensure that recommendations support better diet quality for all Americans, especially underrepresented populations.

In addition to supporting nutrition assistance programs that create access to nutrient-dense foods, equipping children and adults with knowledge and the ability to adopt healthy eating patterns is also essential. Nutrition education and food literacy are integral components in improving the health of Americans, and play a critical role in solutions and collaborative strategies that improve food environments, including those within schools, retail, health care systems, and community settings. The USDA's role in ensuring that major nutrition programs connect nutrition research, such as the Advisory Report, to policy and practice is critical to achieving optimal health of people.

Recommendation: Dairy Council of California urges the USDA and HHS to strengthen nutrition education as an essential component of federal meal programs such as the National School Lunch Program and the Special Supplemental Nutrition Program for Women, Infants, and Children. Providing comprehensive nutrition education on the important role of nutrient-dense foods made available to vulnerable populations through these programs is an important way to support the health of our nation's children and their families.

Milk and Dairy Foods Play an Important Role in Improving Diet Quality

Poor diet is a leading cause of illness in the US, causing approximately half a million deaths per year related to obesity, diabetes, cardiovascular disease, and cancers.⁶ Healthy dietary patterns are defined by the quality of foods that are included and the foods that should be limited. Evidence identified by the DGAC consistently shows that dietary patterns



associated with beneficial health outcomes include a higher intake of whole and minimally processed foods, such as vegetables, fruits, legumes, whole grains, low- or non-fat dairy, lean meats, seafood, nuts and unsaturated vegetable oils, as well as lower consumption of red and processed meats, sugar-sweetened foods and drinks, and refined grains. The consumption of high-quality foods should be the foundation of any eating pattern.

Dairy foods offer health benefits that are different from plant-based and other animal-sourced foods, playing an integral role in supporting overall health. Many Americans continue to under-consume dairy, vegetables and fruits, resulting in nutrient gaps.⁷ 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.

Recommendation: Dairy Council of California supports the recommendations brought forth by the committee that dietary patterns and high-quality diets can best predict overall health status and disease risk more fully than a reductionist approach of individual foods or nutrients.

Despite the submission of a growing body of scientific evidence that shows the beneficial or neutral effects of dairy on chronic disease risk at all fat levels, the DGAC did not include the consumption of high-fat dairy foods in the recommended eating patterns of Americans age 2 and older. Furthermore, the committee recommended a renewed limit of saturated fat intake at no more than 10% of total energy. From a different perspective, however, as diet quality is a crucial aspect in supporting optimal health and preventing chronic disease, the variety and nutrient-density of foods within the overall eating pattern shows more promise than focusing on nutrients in isolation. This emphasis is strengthened by the reality that people do not consume nutrients or foods in isolation, but in various combinations over time.

The report also reflects growing evidence that components of a dietary pattern may have interactive, synergistic, and potentially cumulative relationships that can predict overall health status and disease risk more fully than can individual foods or nutrients. This holds especially true for complex, whole food structures, such as those found in full-fat dairy foods, further validating the role of certain whole dairy foods in dietary patterns supporting health. We are optimistic that the DGAC encourages more research focused on the food matrix and its relationship to saturated fat and health outcomes.

Recommendation: Dairy Council of California strongly supports future research on the importance of the food matrix. Such research would provide additional evidence that high



quality foods, including certain full-fat dairy, are distinguished as health-promoting in future dietary guidelines.

Future Implications for Consideration

Additional areas showing promise in nutrition research include major food groups for which health effects are currently poorly understood, and the interrelationships between nutrition and the gut microbiome, immunity, epigenetics, vascular health, food allergies, and other physiological systems—with implications for human health.¹

The Advisory Report acknowledged the importance of evaluating the sustainability of dietary patterns, food access, availability and cost, as well as systemic changes that could encourage behavior change.

Recommendation: *We agree with the DGAC in strongly encouraging the USDA and HHS to consider the social, economic and environmental contexts that would support improved dietary intake among Americans, especially in considering approaches to implementing the Dietary Guidelines.*

Nutrition greatly impacts the health and well-being of people across their life span and influences many aspects of the lives of children and their families. The Dietary Guidelines for Americans serve as a catalyst to spark collaborative action, nutrition policy and educational efforts, which can increase access to healthful foods and beverages and support adoption of healthy eating patterns for all ages and in all places people live, learn, work, play and gather.

Thank you for the opportunity to submit these comments.

Regards,

Handwritten signature of Tammy Anderson-Wise in black ink.

Tammy Anderson-Wise, MS, CAE
Chief Executive Officer
Dairy Council of California
916.263.3560
andersont@dairycouncilofca.org

Handwritten signature of Ashley Rosales in black ink.

Ashley Rosales, Registered Dietitian Nutritionist
Program Director, Nutrition Science
Dairy Council of California
916.633.3595
arosales@dairycouncilofca.org



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1. Herrick KA, Terry AL, Afful J. Beverage consumption among youth in the United States, 2013-2016. National Center for Health Statistics, Centers for Disease Control and Prevention website. <https://www.cdc.gov/nchs/products/databriefs/db320.htm>. Published September 2018. Accessed November 11, 2019.
 2. Maillot M, Vieux F, Rehm CD, Rose CM, Drewnowski A. Consumption patterns of milk and 100% juice in relation to diet quality and body weight among United States children: analyses of NHANES 2011-16 data. *Front Nutr*. 2019;6:117. doi:[10.3389/fnut.2019.00117](https://doi.org/10.3389/fnut.2019.00117)
 3. Coleman-Jensen A, Rabbitt MP, Gregory CA, Singh A. Household Food Security in the United States in 2018, ERR-270. US Department of Agriculture, Economic Research Service website. <https://www.ers.usda.gov/publications/pub-details/?pubid=94848>. Published September 4, 2019. Accessed October 1, 2019.
 4. Vibrant and Healthy Kids: Aligning Science, Practice, and Policy to Advance Health Equity. National Academies of Sciences, Engineering, and Medicine website. doi: [10.17226/25466](https://doi.org/10.17226/25466).
 5. Holben DH, Marshall MB. Position of the Academy of Nutrition and Dietetics: food insecurity of the United States. *J Acad Nutr Diet*. 2017;117(2):1991-2002. doi:[10.1016/j.jand.2017.09.027](https://doi.org/10.1016/j.jand.2017.09.027)
 6. Fleischhacker SE, Woteki CE, Coates PM et al. Strengthening national nutrition research: rationale and options for a new coordinated federal research effort and authority. *Am J Clin Nutr*. 2020;nqaa179. doi: [10.1093/ajcn/nqaa179](https://doi.org/10.1093/ajcn/nqaa179).
 7. Food Availability (Per Capita) Data System Interactive Charts and Highlights. USDA ERS. <https://www.ers.usda.gov/data-products/food-availability-per-capita-data-system/interactive-charts-and-highlights/#calorie>. Updated September 5, 2019. Accessed October 29, 2019.