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Date: August 13, 2020

The Honorable Sonny Perdue
Secretary, U.S. Department of Agriculture
1400 Independence Ave, SW
Washington, DC 20250

The Honorable Alex Azar
Secretary, U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Submitted via electronic mail: www.regulations.gov

Re: Docket ID: FNS-2020-0015: Comments on the 2020 Dietary Guidelines Advisory Committee Report

Dear Secretaries Perdue and Azar:

The Institute of Food Technologists (IFT) appreciates the opportunity to provide input on the 2020 Dietary Guidelines Advisory Committee (DGAC) report. IFT is a global organization of approximately 13,000 individual members from 95 countries committed to advancing the science of food. Since 1939, IFT has brought together the brightest minds in food science, technology and related professions from academia, government, and industry to solve the world's greatest food challenges. Our organization works to ensure that our members have the resources they need to learn, grow, and advance the science of food as the population and the world evolve. We believe that science is essential to ensuring a global food supply that is sustainable, safe, nutritious, and accessible to all.

For the first time, the DGAC was charged to review scientific evidence and develop recommendations for ages 0-24 months and pregnant and lactating women, in addition to developing recommendations for 2 years and older based on life stages. IFT applauds members of the DGAC for completing this monumental charge and for:

- Reinforcing the importance of following a healthy dietary pattern(s) across all life stages.
- Recognizing the role of food processing strategies to help meet nutrient needs.

Reinforcing adoption of healthy dietary pattern(s): The recommended dietary pattern(s) allow for flexibility to include all forms of nutrient-dense foods¹, whether fresh, frozen, canned, or otherwise processed, that can be tailored to meet individual and cultural preferences and circumstances, across the lifespan. The 2020 DGAC suggest including concepts (summarized below) on five overarching guidelines identified in the 2015-2020 *Dietary Guidelines for Americans*, in addition to the specific recommendations and advice outlined in the 2020 DGAC report (*Dietary Guidelines Advisory Committee, 2020; United States Department of Health and Human Services and United States Department of Agriculture, 2015*). These concepts are:

- Initiate, follow, and modify the dietary pattern(s), as appropriate, to meet the nutritional needs across the various life stages.
- Focus on the nutritional quality of foods, portion size, and frequency of eating; focus on breastfeeding and human milk for optimal nutrition in the early stage of life with gradual introduction of a variety of nutrient-rich complementary foods during the second half of infancy.
- Limit foods and beverages that are sources of added sugars, saturated fats, and salt to reduce intake of excess energy, solid fats, and sodium, and replace with more healthful choices.
- Include/shift eating pattern(s) to a variety of nutrient-dense foods and beverages at every age to achieve a more healthful diet.
- Support access to healthful foods and beverages and healthful eating patterns in all food environments for all Americans at all ages.

Food processing through the application of food science and technology will continue to play an integral role in making safe healthy food choices available to consumers of all ages, that fit within a healthy dietary pattern(s). We believe that these concepts will spur food scientists and technologists to formulate/reformulate food and beverage products that follow suggestions in the Dietary Guidelines and help consumers with diverse nutritional needs to choose foods and beverages that enable the adoption of a healthy dietary pattern(s), across various life stages. IFT members are constantly identifying ways to formulate/reformulate food and beverage products to support the dietary guidance.

Innovations in food science and processing technologies have led to diversity of food choices that may encourage healthy eating pattern(s), in addition to meeting consumers' needs of safety, convenience, palatability, affordability, accessibility, and cultural preferences. Further, portion-controlled packaging could help with portion size. Strategies to develop food products low in sodium, added sugars, and/or saturated fats (Buttriss, 2013; El et al., 2011; Hutchings et al., 2019; *Innova Market Insights, 2019; Institute of Food Technologists, 2010; Nachay, 2013, 2018; Pszczola, 2012; Taylor et al., 2018; Weaver et al., 2014*) are implemented and continuously evolving to help consumers reduce the intake of food components to limit, as recommended by the 2020 DGAC and previous *Dietary Guidelines for Americans* (*Dietary Guidelines Advisory Committee, 2020; United States Department of Health and Human Services and United States Department of Agriculture, 2015*).

¹**Nutrient-dense foods**—Foods that are naturally rich in vitamins, minerals, and other substances and that may have positive health effects; that are lean or low in solid fats and do not have added solid fats, sugars, starches, or sodium; and that retain naturally-occurring components, such as fiber. All vegetables, fruits, whole grains, fish, eggs, and nuts prepared without added solid fats or sugars are considered Nutrient-dense, as are lean or low-fat forms of fluid milk, meat, and poultry prepared without added solid fats or sugars. Nutrient-dense foods provide substantial amounts of vitamins and minerals (micronutrients) and relatively few calories compared to forms of the food that have solid fat and/or added sugars (*Dietary Guidelines Advisory Committee, 2020*).

Recognizing the role of food processing: The 2020 DGAC reported that dietary fiber, calcium, magnesium, potassium, choline, and vitamins A, C, D, E, and K are under consumed by the entire population. In addition, intake of one or more essential nutrients (such as protein, iron, zinc, and vitamins D, folate, and B12) is insufficient among one or more cohorts, such as women of reproductive age, infants, adolescents girls, and older adults. The 2020 DGAC recognizes that food processing strategies, such as fortification could help increase intake of nutrients, that can fit into a healthy dietary pattern(s) for food products selected and consumed at home and away from home. For example, foods targeted for specific life stages, such as infant cereals fortified with iron and zinc and cereals fortified with iron and folate for adolescent girls and adults, specifically women of reproductive age (*Dietary Guidelines Advisory Committee, 2020*).

Food processing is used to transform raw food agricultural commodities and other food ingredients into a variety of safe, nutritious, palatable, accessible, convenient, and affordable foods that are available year around, thus contributing to both food and nutrition security. Most foods are processed and prepared to be safe and edible, upon harvesting. Food processing is crucial, as fresh and locally grown foods alone cannot reliably meet the nutritional requirements of the growing and diverse population or the specific needs at each life-stage (*Institute of Food Technologists, 2010; Weaver et al., 2014*). Through research and development, food scientists and technologists have been identifying novel and effective ways of increasing nutritional quality of food and beverage products that fit into a healthy dietary pattern(s), while maintaining safety and sensory attributes and meeting evolving consumer demands. For example, developing sources of novel fiber to increase fiber intake, using non-thermal processing and high-pressure processing technologies to make stable and affordable foods while delivering on taste, creating plant-based sources of omega-3 fatty acids for individuals who are unable to consume seafood (e.g., individuals who have allergies to fish) or prefer alternate sources of omega-3 fatty acids due to dietary practices, for example, exposure of mushrooms to UV light to increase and deliver higher amount of vitamin D, and formulating food and beverage products with plant-based ingredients (*Bernstein et al., 2019; Dietary Guidelines Advisory Committee, 2020; Pszczola, 2012; United States Department of Agriculture and United States Department of Health and Human Services, 2010; United States Department of Health and Human Services and United States Department of Agriculture, 2015; United States Food and Drug Administration, 2018, 2019; Weaver et al., 2014*).

The purpose of the *Dietary Guidelines for Americans* — “to promote health and reduce risk of chronic disease” (*United States Department of Agriculture, n.d.*), will be achieved only if the Dietary Guidelines are easy to implement, adopt, and foster long-term behavioral changes. While the guidelines need to be aspirational, it is extremely important that they enable sustainable implementation, to maximize adoption by all Americans, particularly those with limited resources (e.g., income and time) (*Institute of Food Technologists, 2019*).

The 2020 DGAC notes that “...the typical American dietary pattern is not currently nor has it ever been aligned with recommendations issues by the *Dietary Guidelines for Americans* since their inception in 1980” (*Dietary Guidelines Advisory Committee, 2020*). Further, the 2020 DGAC acknowledges that the dietary patterns are shaped by a complex interaction of personal (e.g., taste) and cultural preferences, social context, behavioral aspects, and other factors that act as facilitator or barriers (*Dietary Guidelines Advisory Committee, 2020*).

IFT has been consistently emphasizing that the recommendations should integrate the pursuit of nutrition aims with the practicalities of life, and that the important role of factors such as socio-economic status, food insecurity, taste, time, education, palatability, and cooking skills should not be overlooked (*Institute of Food Technologists, 2018, 2019, 2020*). However, none of these factors were discussed at length because the 2020 DGAC was not charged with evaluating the impact of these factors on the adoption of the guidelines. We applaud the 2020 DGAC's recognition that non-nutritional factors impact dietary behaviors and their recommendation for future research — to apply a systems approach into the Dietary Guidelines process, which would examine multilevel social ecologic determinants of food choice (e.g., food palatability, food cost, convenience, advertising, and exercise patterns) and the contribution of the food environment (e.g., household factors such as cultural practices, community factors like food store availability, and food policies) on food and beverage intake at home and away from home (*Dietary Guidelines Advisory Committee, 2020*).

Further, the 2020 DGAC identified research needs as well as considerations for future DGACs related to the topics and questions examined in its review and encourages that all research recommendations be considered by the future DGACs and USDA and HHS, including the following (*Dietary Guidelines Advisory Committee, 2020*):

- Research to understand the impact of socio-ecological factors, such as food security and access to healthy food choices that affect the ability of individuals and households to follow dietary guidance and impact diet quality. Additionally, future work should address taste and cost since these factors have been reported as primary drivers of food choices. The 2020 DGAC believes that an understanding of these factors would help in developing recommendations which encourage better quality diets for all Americans.

To address the non-nutritional factors that impact dietary habits, IFT believes that diverse expertise, including expertise in food science and processing technologies, behavioral science, social science, and economics is needed. IFT strongly urges USDA and HHS to include food scientists and technologists, behavioral scientists, economists, and other experts to adequately represent the needed expertise in future DGACs.

IFT believes that the *Dietary Guidelines for Americans* (DGAs) should help maintain or improve nutrition, health, and food safety, while fostering behavioral change through clear science-based recommendations. Recommending dietary changes that are not achievable by most consumers neither improves nutrition and health nor serves the public.

Evidenced-based dietary recommendations that are both practical and realistic will result in consumer acceptance and adoption, across all life stages and cohorts. Acceptance and adoption of such recommendations empowers food industry, and food scientists and technologists to advance innovations and reformulations for safe, accessible, palatable, and affordable food and beverage products, that could be a part of a healthy dietary pattern(s) across all life stages, while also meeting cultural preferences and resource constraints.

IFT appreciates the opportunity to provide comments on 2020 DGAC report. Food scientists and technologists share a commitment to develop healthy food products, key to successfully implementing the DGAs. IFT and its members are committed to assisting with the implementation of the 2020-2025

Dietary Guidelines for Americans, and we believe our scientific and technological capabilities will help in developing future evidence-based dietary recommendations. We thank you in advance for your consideration of our comments. Please contact Farida Mohamedshah, Director, Nutrition Science, Food Laws and Regulations (fmohamedshah@ift.org; 202-330-4986), if IFT may provide further assistance.

Sincerely,



Pam Coleman, MBA, CFS
IFT President, 2019-2020



Christie Tarantino-Dean, FASAE, CAE
IFT, Chief Executive Officer

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