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Janet M. de Jesus, MS, RD  
Office of Disease Prevention and Health Promotion  
Office of the Assistant Secretary  
Department of Health and Human Services  
1101 Wootton Parkway, Suite 420  
Rockville, Maryland 20852

RE: Comments for 2025 Dietary Guidelines Advisory Committee (Docket No. OASH-2022-0021-0001)

Dear Ms. De Jesus,

The Institute of Food Technologists (IFT) and American Society for Nutrition (ASN) appreciate the opportunity to provide these comments on the Committee's work and progress to this point. IFT is a global organization of approximately 11,000 food scientists, technologists and related professionals committed to advancing the science of food and promoting a global food system that is equitable, sustainable, safe and nutritious. ASN has more than 8,000 members around the globe working throughout government, clinical practice, academia, and industry, and conducting research to achieve the ASN vision of "A Healthier World Through Evidence-Based Nutrition".

We applaud the Dietary Guidelines Advisory Committee (DGAC) and the HHS and USDA staff for their hard work and dedication to thoroughly review the scientific evidence for the development of the *Dietary Guidelines for Americans, 2025-2030*. In particular, we commend the DGAC for taking on the ambitious task of diet simulations with more than 2500 different 7-day menus within each age group to evaluate nutritional adequacy of a wide variety of diets, including culturally relevant diets for Native American and Native Alaskan populations. This effort is greatly needed to enable understanding of the achievability and flexibility of the Dietary Guidelines across age groups and populations.

We note with interest that the simulations established probabilities for inclusion of "low nutrient dense foods" in diet patterns, and these low nutrient dense foods were determined based on draft

thresholds for added sugar, saturated fat, and sodium.<sup>1</sup> While these values may be debated and are currently only in draft form, we agree that this approach provides an objective and reproducible way to identify foods with low vs. high nutrient density and enables precision in modeling nutrient adequacy in diets with different proportions of these foods. Juxtaposed with the more subjective and ambiguous definitions of ultra-processed foods (UPF), the use of high and low nutrient dense foods to evaluate diet quality provides a well-defined approach that can be more clearly implemented in federal programs and education initiatives, such as MyPlate.

Considering the nutrient density of foods instead of the degree of processing will also provide greater clarity on the dietary components responsible for certain health outcomes. For example, a recent study in *Lancet*<sup>2</sup> reported an association of UPF with CVD, CHD and stroke, but the risk was dependent on the type of UPF. Sugar sweetened beverages and processed meats (high in added sugars, sodium, and saturated fat) were linked to a higher risk for CVD and CHD, but other, more nutritionally dense UPF, such as cereals, breads, yogurt/dairy were inversely related to disease risk. This further supports the importance of the nutritive components of food and health outcomes.

Other non-nutritive components of foods, such as flavors, colors and preservatives were discussed by the DGAC as being an important component of most UPF definitions, yet the research into the health effects of these ingredients is not as established as the science on nutritive components, such as added sugars, sodium, and saturated fat. As the committee integrates their scientific findings into recommendations and defines future research directions, we would suggest the DGAC emphasize the need to continue monitoring the research on non-nutritive components and if the science has evolved considerably when the next committee convenes, to consider establishing an interdisciplinary team, including food safety experts and toxicologists, to evaluate the science behind these ingredients and their health impacts.

We again thank the Dietary Guidelines Advisory Committee for their exceptional work and progress on the next iteration of the *Dietary Guidelines for Americans* and we thank you for considering our comments. Please contact Anna Rosales, Senior Director Government Affairs and Nutrition ([arosales@ift.org](mailto:arosales@ift.org)) or Sarah Ohlhorst, Chief Science Policy Officer ([sohlhorst@nutrition.org](mailto:sohlhorst@nutrition.org)) if IFT or ASN may be of further assistance.

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Institute of Food Technologists

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<sup>1</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/draft-guidance-industry-questions-and-answers-about-dietary-guidance-statements-food-labeling>

<sup>2</sup> Mendoza, Kenny, et al. "Ultra-processed foods and cardiovascular disease: analysis of three large US prospective cohorts and a systematic review and meta-analysis of prospective cohort studies." (2024) *The Lancet Regional Health—Americas* 37.