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May 6, 2022

Janet M. de Jesus, MS, RD,
Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary for Health
United States Department of Health and Human Services

Dear Ms. de Jesus,

On behalf of Oldways, a 501(c)3 educational nonprofit dedicated to inspiring people to embrace the healthy and sustainable joys of the old ways of eating, we wholeheartedly support the HHS and USDA's goal to strengthen the transparency in the Dietary Guidelines process.

Overall, we express broad support for the questions and topics proposed. Specifically, we are writing in support of the focus on overall food patterns ("Dietary Patterns Across the Stages") rather than individual nutrients, as well as an examination of a broad range of health outcomes. We are also writing in support of the strategies for individuals and families related to diet quality, especially the question related to repeated exposure and food acceptability. Repeated exposure to healthy foods can improve diet quality in the short term, and is essential for nurturing American appetites for nutritious food and laying the foundation for lifelong healthy habits.

Below are the relevant and important issues that we urge the 2025-2030 Dietary Guidelines Scientific Advisory Committee (DGSAC) to address in the upcoming Dietary Guidelines, and were absent from the proposed topics as currently written.

This comment is in relation to: The separate process to address sustainability.

- **Suggested changes:** While we are encouraged to learn that HHS and USDA view sustainability and the relationship between food and climate change as a high-priority topic, we urge HHS and USDA to incorporate these findings as a part of the 2025-2030 Dietary Guidelines for Americans, rather than a separate process.
- **Rationale for changes:** Examining sustainability in a separate effort apart from developing the Dietary Guidelines puts Americans at risk of receiving contradictory guidance on optimal food patterns. The best dietary advice on the planet is meaningless if we aren't able to produce or access the foods recommended for health. As noted in the [EAT-Lancet Summary Report](#), "food is the single strongest lever to optimize human health and environmental sustainability on Earth."

This comment is in relation to: “What is the relationship between consumption of dietary patterns with varying amounts of ultra-processed foods and growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance?”

- **Suggested changes:** We encourage the DGSAC to consider not just the amount of ultra-processed foods, but the type of ultra-processed foods and their key ingredients, as well as their relationship with diet quality.
- **Rationale for changes:** Emerging research indicates that diets centered around ultra-processed foods (particularly those high in sugar, salt, and fat) may be linked with increased risk of [weight gain](#) and [diet-related diseases](#). However, not all ultra-processed foods are created equal. Under the popular [NOVA](#) classification of food processing, staple health foods like mass market 100% whole grain bread would be considered “ultra-processed,” alongside foods of far inferior nutritional quality, such as soft drinks. Likewise, the NOVA classification draws no distinction between whole grains or refined grains, as whole wheat flour, brown rice, and quinoa would be in the same category as refined flour and white rice, despite the refining process removing the healthful bran and germ of the grain. Thus, we urge the committee to take a nuanced approach and focus on diet quality and the impact of different processing methods rather than viewing all ultra-processed foods as interchangeable.

This comment is in relation to: “What is the relationship between food sources of saturated fat consumed and risk of cardiovascular disease?”

- **Suggested changes:** We propose expanding the question to include dairy fat at differing fat levels (full fat dairy vs low fat or fat-free dairy). We also propose including animal (e.g., butter, lard, meat) and plant (e.g., palm oil, coconut oil) sources, different food matrices that encompass saturated fats (e.g., saturated fats in cheese vs yogurt), and different production techniques (e.g., refined deodorized bleached vs virgin coconut oil vs fermented cheeses and yogurts) on health outcomes.
- **Rationale for changes:** Given the [seemingly contradictory findings](#) that lower-fat dairy products have been linked with higher risks of metabolic syndrome, while full-fat dairy products have linked with a lower risk of metabolic syndrome, as well as the benefits of fermented dairy products (such as yogurt) on the gut microbiome, thoroughly investigating the impact of various sources of saturated fat as well as dairy products at different fat levels will serve to strengthen the Dietary Guidelines.

This comment related to Food Pattern Modeling proposes additional Dietary Patterns:

- **Suggested changes:** We encourage the DGSAC to broaden the scope of the USDA Food Patterns they are studying, and explore additional cultural models of healthy eating such as African Heritage Diets, Asian Heritage Diets, Latin American Heritage Diets, and Native American Diets.
- **Rationale for changes:** Americans of color are disproportionately affected by several chronic diseases, highlighting the need for more inclusive dietary guidance. Further, a 2020 [Food4Health Alliance report](#) found that more than 90% of the reviews conducted for the Dietary Guidelines did not account for race, ethnicity, and/or socio-economic status. We applaud the focus on cultural food traditions in the 2020-2025 Dietary Guidelines for Americans, and recognize that further action is needed to help prevent bio-ethnocentrism in the Dietary Guidelines and help reduce racial and ethnic health disparities. Like the Mediterranean Diet, African Heritage Diets, Asian Heritage Diets, and Latin American Diets also share a plant-forward pattern featuring many common food groups. This in turn provides the framework to describe the more specific foods eaten in a particular country or region. (e.g. “rice and bean” dishes like Caribbean Peas and Rice, Greek Chickpeas and Rice, or Mexican Tomato Rice and Black Beans). Additionally, cultural diets serve to meet needs that are not explicitly being addressed with the existing Dietary Patterns. For example, given the prevalence of lactose-intolerance in non-white populations (especially those of East Asian and African descent), it is unclear from existing Dietary Patterns if the benefits of increased calcium intake via low-fat and non-fat dairy sources outweigh the discomforts associated with lactose intolerance. Additionally, existing Dietary Patterns are unclear on whether lower-lactose dairy sources (such as hard cheeses) and/or plant-based dairy sources (like leafy greens) might be preferable in certain populations. Because the 2020-2025 Dietary Guidelines limited their analysis of dairy to its relationship with adiposity (and children’s growth), the Dietary Guidelines could also benefit from an updated analysis of how dairy relates to risk of fracture and/or osteoporosis across Americans of different racial and ethnic backgrounds. At Oldways, we have found that culture and heritage can actually motivate people to embrace healthier diets. For example, a 2022 [study](#) published in the *Journal of Nutrition Education and Behavior* shows that 98% of participants of A Taste of African Heritage (a 6-week cooking and nutrition curriculum in the SNAP-Ed Toolkit featuring foods from the African Diaspora) report that history and heritage were positive motivators for living and eating well.

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We thank the HHS and USDA for the opportunity to share our expertise on the proposed topics, and we look forward to participating in the next steps of the Dietary Guidelines process.

Sincerely,



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