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Kristin Koegel  
USDA Food and Nutrition Service  
Center for Nutrition Policy and Promotion  
1320 Braddock Place  
Room 4094  
Alexandria, VA 22314

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Dear Ms. Koegel:

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 are writing in strong support of the Scientific Report of the 2020 Dietary Guidelines Advisory Committee. We applaud committee members for prioritizing public health and for taking a thorough, evidence-based approach to evaluating the science, especially amidst time-related and pandemic-related constraints.

Specifically, we applaud the food-based recommendations of the Scientific Report of the 2020 Dietary Guidelines Advisory Committee, particularly as they relate to these pressing topics:

- **Emphasis on dietary patterns, including a Mediterranean diet and vegetarian diet:** We concur with the 2020 Dietary Guidelines Advisory Committee, that “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.” Additionally, our 30-year history in the nutrition education space has taught us that dietary patterns, including cultural models of healthy eating like the Mediterranean diet, are practical guides for showing people *how* to incorporate nutritious foods into a balanced diet.
- **Emphasis on whole grains:** We strongly affirm the conclusion of the 2020 Committee report, which identifies whole grains “with almost the same consistency as vegetables and fruits as beneficial for the outcomes examined, suggesting that these 3 plant-based food groups are fundamental constituents of a healthy dietary pattern.” Given the explicit need for “a shift toward a higher proportion of total grains as whole grains and a reduction in refined grains,” we encourage the 2020-2025 Dietary Guidelines for Americans to include the messaging to make “AT LEAST half your grains whole,” thereby contesting the widely-held misconception that refined/enriched grains and whole grains are nutritionally equal.
- **Guidance on infant and toddler nutrition:** We applaud the momentous undertaking of developing guidance on infant and toddler nutrition. The particular importance of whole grains for children 12-24 months (making upwards of 2/3 of the total grain intake whole) is essential in setting the stage for healthy habits down the road, and encouraging parents and caregivers to offer foods that will best help support growing brains and bodies during this important developmental stage.

- **Reduction in added sugars:** We lend strong support to the recommended reduction of added sugars to 6 percent or fewer of calories at most energy levels. Both science and common sense tell us that if added sugars are consumed in excess, Americans will have difficulty meeting their nutrient needs without exceeding recommended calorie limits, thus putting them at risk for diet-related conditions such as obesity and chronic disease.
- **Common ground over confusion:** We applaud the emphasis on common ground, noting that “although these 3 Food Patterns have some key differences that allow for tailoring to individual preferences, they share some core components, including obtaining the majority of energy from plant-based foods, such as fruits, vegetables, legumes, whole grains, nuts and seeds, and obtaining protein and fats from nutrient-rich food sources, while limiting intakes of added sugars, solid fats, and sodium.” Much of the prevailing confusion pitting one “diet” against another is unnecessary, and at odds with [expert consensus](#) and the weight of evidence.
- **Emphasis on seafood:** We support the emphasis on seafood in the diets of pregnant and lactating women, in addition to people as young as 6 months. Research consistently shows that regular seafood consumption before and during pregnancy can help lower pregnancy complications (such as gestational diabetes or preterm birth) and promote healthy development in children. Seafood is also a key element of the Mediterranean diet, an eating pattern with some of the most well-documented health benefits across the lifecycle.

Despite our overwhelming support for the conclusions of the Scientific Report of the 2020 Dietary Guidelines Advisory Committee, we still see opportunity to better align Dietary Guidelines with public health, and better help the public navigate the noisy world of nutrition guidance. Specifically, we recommend that the following topics be given consideration in the final 2020-2025 Dietary Guidelines for Americans, and/or in future DGA processes:

- **Sustainability:** We concur with the Scientific Report of the 2020 Dietary Guidelines Advisory Committee on the need to examine the Dietary Guidelines’ relationship to the sustainability of the food system. We, along with the [nutrition experts of the Oldways Finding Common Ground conference](#), affirm the appropriateness and importance of this imperative in the Dietary Guidelines for Americans because food insecurity cannot be solved without sustainable food systems. Inattention to sustainability is willful disregard for the quality and quantity of food available to the next generation, as the best dietary advice on the planet is meaningless if we aren’t able to produce or access the foods recommended for health.
- **Saturated fat from different sources:** As suggested throughout the report, people eat food, not individual nutrients. We concur with the Scientific Report of the 2020 Dietary Guidelines Advisory Committee on the need to examine the effects of different food sources of saturated fats, including animal (e.g., butter, lard) and plant (e.g., palm vs coconut oils) 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) on health outcomes. Specifically, 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, 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.

- **Relationship between alcohol intake and cardiovascular disease, diabetes:** The tightening of alcohol recommendations from 2 drinks/day to 1 drink/day for men in the 2020 report appears to be based solely on alcohol's relationship with all-cause mortality and nutrient/food group recommendations. Given the complicated, yet sometimes protective relationship between low-moderate alcohol intake and cardiovascular disease and diabetes management in epidemiological research, more thoroughly exploring alcohol's relationship with these outcomes might better inform alcohol recommendations across the U.S. population, where cardiovascular disease remains the number one killer of both men and women.
- **Variety of calcium sources:** Given the prevalence of lactose-intolerance in non-white populations (especially those of East Asian and African descent), it is unclear from the report if the benefits of increased calcium intake via low-fat and non-fat dairy sources outweigh the discomforts associated with lactose intolerance. Additionally, the report is 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 Scientific Committee 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. Such investigations can help to prevent bio-ethnocentrism in the Dietary Guidelines and help reduce racial and ethnic health disparities.

Although the Scientific Report of the Dietary Guidelines Advisory Committee is intended to serve as the scientific basis for the Dietary Guidelines for Americans, the translation from Scientific Report to Dietary Guidelines has often watered down the integrity of the final report, as the policy writers, more so than the scientists, are subject to the most bias from industry stakeholders. We concur with the [National Academies](#), that "If the DGA omits or only accepts parts of the conclusions in the DGSAC report, a clear explanation has to be given as to why."

We thank the USDA and HHS for the opportunity to share our expertise on the report, and we look forward to seeing this report get translated into the 2020-2025 Dietary Guidelines for Americans. We urge policy-makers to use these guidelines to inform federal food and nutrition policy, including the National School Lunch Program and School Breakfast Program.



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