



HEALTH THROUGH HERITAGE

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Center for Nutrition Policy and Promotion
Food and Nutrition Service
Department of Agriculture

Dear Kristin Koegel,

On behalf of Oldways, a 501(c)3 educational non-profit dedicated to fostering good health through heritage, we wholeheartedly support the USDA and HHS's goal to strengthen the transparency in the Dietary Guidelines process. Below are the relevant and important issues that we urge the 2020-2025 Dietary Guidelines Scientific Advisory Committee (DGSAC) to address in the upcoming Dietary Guidelines, but were absent from the proposed topics as currently written.

USDA Food Patterns: We applaud the USDA and HHS for focusing on overall food patterns, such as Mediterranean and vegetarian diets, rather than individual nutrients. As the 2020-2025 DGSAC explores if any changes to the USDA food patterns are needed, we encourage them to investigate how well the Mediterranean Diet, as described by the USDA, represents a "true" Mediterranean diet. For instance, the Mediterranean Dietary Pattern, as defined by the 2015 DGAC, contains twice the amount of red meat as recommended in the USDA pattern. A true Mediterranean diet (such as one represented in the Mediterranean Diet Pyramid or used as the basis of a Mediterranean-Style Dietary Pattern Score in numerous nutrition studies) contains much less red meat and has a greater emphasis on whole grains, among other differences. Additionally, we encourage the DGSAC to broaden the scope of the USDA Food Patterns they are studying, and explore other cultural models of healthy eating, such as African Heritage Diets or Traditional Asian Diets.

Sustainability: We urge the 2020-2025 DGSAC to explore the relationship between food choices and environmental impacts/sustainability. Analyzing the sustainability and accessibility of the foods promoted in the Dietary Guidelines can only strengthen the guidelines, as the best dietary advice on the planet is meaningless if we aren't able to produce or access the foods recommended for health. Future generations of Americans will be at a disadvantage, unless we start recognizing the link between the health of our planet, the health of our food supply, and the health of our citizens. This would not be the first time that the DGAC has explored food and nutrition through broad terms, rather than narrowly defined nutritional issues. Previous DGAC reports have made recommendations regarding food safety (2005 DGAC), food cost and availability (2005 DGAC), and food marketing (2010 DGAC). Just as these considerations fall within the purview of the DGAC, so too does sustainability.

Added Sugars / Sugar Sweetened Beverages: Though we admire the USDA and HHS for including added sugars and sugar sweetened beverages in these topics, the proposed questions fail to investigate any potential consequences of sugar consumption. Thus, we urge the USDA and HHS to reframe the questions surrounding added sugars and sugar sweetened beverages to investigate their relationship with obesity, type 2 diabetes, cardiovascular disease, dental caries, and other health consequences.

Sodium: We urge the 2020-2025 DGSAC to investigate the role of sodium, particularly as it relates to stroke risk and cardiovascular disease risk. There are currently no questions that address this issue.

Saturated, Polyunsaturated, and Monounsaturated Fats: We are pleased to learn that the relationship between saturated fat and cardiovascular disease will be investigated by the DGAC. However, in order to get the most practical advice for consumers, we suggest rewording the question to clarify that this will be looked at in context of the replacement nutrient (for example, what happens to heart disease risk when calories from saturated fat are replaced with calories from polyunsaturated fat, monounsaturated fat, or whole grains). As esteemed scientists from vegan to Paleo, and from low-fat to Mediterranean concluded at the [Oldways Finding Common Ground Conference](#), “what we consume and what we don’t consume instead, both contribute to health outcomes.”

Disease Prevention Throughout the Lifecycle: Given the increased prevalence in childhood overweight and obesity over the past few decades, health conditions such as type 2 diabetes, dislipidemia, fatty liver, and hypertension are becoming a reality for children and adults alike. We recommend that USDA and HHS add questions to investigate the relationship between dietary patterns and health conditions like these for multiple age ranges, not just for adults.

Supporting Healthy Eating Patterns: As the 2015-2020 Dietary Guidelines for Americans point out, “Americans are consuming too many calories, are not meeting food group and nutrient recommendations, and are not getting adequate physical activity.” We recommend that the 2020-2025 DGSAC explore which strategies (including Social-Ecological Models) are effective at helping Americans shift to a healthier diet.

We thank the USDA and HHS 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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