



The Johns Hopkins Center for a Livable Future  
Bloomberg School of Public Health  
615 North Wolfe Street, W7010  
Baltimore, MD 21205

March 30, 2018

Mr. Brandon Lipps  
Administrator, Food and Nutrition Service  
United States Department of Agriculture  
3101 Park Center Drive  
Alexandria, VA 22302

Dr. Donald Wright  
Deputy Assistant Secretary for Health  
Office of Disease Prevention and Health Promotion  
Office of the Assistant Secretary for Health  
United States Department of Health and Human Services  
11001 Wootton Parkway, Suite LL 100  
Rockville, MD 20852

Ms. Kristin Koegel  
Food and Nutrition Service  
Center for Nutrition Policy and Promotion  
United States Department of Agriculture  
3101 Park Center Drive, Suite 1034  
Alexandria, VA 22302

*Disclaimer: The opinions expressed herein are our own and do not necessarily reflect the views of The Johns Hopkins University.*

RE: Requests for Comments: 2020-2025 Dietary Guidelines for Americans, Federal Register Number: 2018-04058

Dear Dr. Lipps, Mr. Wright, and Ms. Koegel,

We are researchers at The Johns Hopkins Center for a Livable Future, based at the Bloomberg School of Public Health in the Department of Environmental Health and Engineering. The Center engages in research, policy analysis, education, and other activities guided by an ecologic perspective that diet, food production, the environment, and public health are interwoven elements of a complex system. We recognize the important role that the Dietary Guidelines for Americans play in promoting health, advising nutrition choices, and informing policies and programs across the United States. We appreciate the opportunity to comment on the topics and questions proposed for the development of the 2020-2025 Dietary Guidelines for Americans. We are including below our comments on and recommendations for these proposed topics and questions, additional recommendations for the scope and purview of the

Dietary Guidelines Advisory Committee (DGAC), and our support for transparency as a core tenet of the dietary guidelines development process.

### **Comments on the Proposed Topics and Scientific Questions**

We support the following proposed topics. Recommendations for additional questions and areas of study within each topic are also provided below.

#### *Support:*

- “Dietary patterns to promote health, prevent disease, and meet nutrient needs” for adults and older adults.
- “Dietary patterns to promote health and normal growth and meet nutrient needs” for children and adolescents.

#### *Recommendation:*

In addition to the proposed questions in each of the previous two categories, we recommend that the DGAC explore the relationships between dietary patterns high in meat and other animal-based foods and health outcomes and chronic disease, particularly in comparison to dietary patterns rich in fruits, vegetables and plant-based protein. For example, high meat consumption has been linked with chronic diseases such as cardiovascular diseases, type 2 diabetes, cancer and obesity.<sup>i,ii</sup> In contrast, there is increasing evidence that dietary patterns higher in plant-based foods and lower in animal-based foods can help prevent these conditions and promote health.<sup>iii,iv,v</sup> Specific additional questions that support the exploration of this topic include:

- What is the relationship between consumption of red and processed meats and health outcomes for all populations?
- What is the relationship between plant-based food and beverages and health outcomes for all populations?
- What is the relationship between plant-based food and beverages and achieving nutrient and food group recommendations and the
- What is the relationship between specific dietary patterns and current and long-term food security?

#### *Support:*

- “Beverages (cow’s milk, water, 100% fruit juice, sugar-sweetened beverages, milk alternatives, caffeinated beverages)” for all populations
- “Complementary foods and beverages: Timing of introduction, types, and amounts” for infants and toddlers from birth to 24 months

#### *Recommendation:*

As part of the proposed questions, we recommend specifically exploring the relationship between milk alternatives and achieving nutrient and food group recommendations, as more than a third of the United States population has lactose malabsorption, which can become lactose intolerance,<sup>vi</sup> and that cow’s milk allergy, although over-diagnosed in some cases, is the most common food allergy in

young children.<sup>vii</sup> This additional line of inquiry is also supported by the rapidly growing market for alternative dairy products.

### **Recommendation for Additional Topic and Questions**

As previous committees have found, dietary recommendations alone do not create eating patterns and behaviors that maintain and protect health. Changes to our food policies are also needed to support a healthy food environment that facilitates and enables these healthy behaviors. The 2015 and 2010 Dietary Guidelines have included chapters on the social-ecological model and the role of the food environment and policy in encouraging Americans to make healthy food choices. The 2015 Dietary Guidelines state: “Consistent evidence shows that implementing multiple changes at various levels of the Social-Ecological Model is effective in improving eating and physical activity behaviors.”<sup>viii</sup> In light of this, we propose adding the following topic and questions to encourage healthy eating patterns to inform the 2020-2025 Dietary Guidelines for Americans.

#### **Social-Ecological Factors to Encourage Healthy Eating Patterns**

- What are effective behavioral, economic, educational, food environment, and policy interventions that can encourage and support a healthy diet as outlined in the Dietary Guidelines?
- What are the relationships between the Social-Ecological Model, health equity, and a food environment that facilitates healthy food choices that adhere to the Dietary Guidelines?

### **Additional Comments**

In addition to our comments on and recommendations for the above proposed topics and questions, we recommend that the Dietary Guidelines Advisory Committee be allowed and encouraged to pursue additional related topics and questions that may arise during the review process. While we appreciate the opportunity for public comment on the proposed topics and scientific questions, it is unclear whether the final Dietary Guidelines for Americans report will include only the topics identified by the agencies. We are concerned that determining these topics and questions before appointing the DGAC will limit the committee’s ability to independently and transparently develop an advisory report that is guided by the latest science on health and nutrition. The DGAC must have the ability to pursue a broad range of factors, including policy and environmental approaches that influence dietary and weight-related behaviors. The DGAC policy report should continue to reflect these sensible, evidence-based improvements to our food environment and emphasize public policies that support and facilitate Americans’ ability to make healthier food and beverage choices.

We would also like to take this opportunity to highlight and emphasize the critical role of transparency in ensuring evidence-based dietary guidance that will be widely accepted among Americans. The dietary guidelines are the administration’s opportunity to provide evidence-based, forward-thinking nutrition guidance. As such, they must prioritize the health of Americans and the future of our food system over corporate interests. It is critical to preserve the integrity of the Dietary Guidelines with evidence-based research and increased transparency, and by taking steps to minimize conflicts of interest throughout the process.

Thank you for considering our comments. We welcome the opportunity to discuss this further and answer any questions you may have. Please contact us at (410) 502-7578 or by emailing Bob Martin, Director of the Food System Policy Program, at [rmarti57@jhu.edu](mailto:rmarti57@jhu.edu).

Sincerely,

**Martin Bloem, MD, PhD**

Director, Johns Hopkins Center for a Livable Future  
Johns Hopkins University  
Professor, Department of Environmental Health & Engineering  
Johns Hopkins Bloomberg School of Public Health

**Robert Martin**

Senior Lecturer, Department of Environmental Health & Engineering  
Johns Hopkins Bloomberg School of Public Health  
Program Director, Food System Policy  
Johns Hopkins Center for a Livable Future  
Johns Hopkins University

**Carolyn Hricko, MPH**

Research Program Manager, Food System Policy  
Johns Hopkins Center for a Livable Future  
Johns Hopkins University  
Department of Environmental Health & Engineering  
Johns Hopkins Bloomberg School of Public Health

**Becky Ramsing, MPH, RD**

Senior Program Officer, Food Communities & Public Health Program  
Johns Hopkins Center for a Livable Future  
Johns Hopkins University  
Department of Environmental Health & Engineering  
Johns Hopkins Bloomberg School of Public Health

**Erin Biehl, MSPH**

Sr. Program Coordinator, Food System Sustainability & Public Health  
Johns Hopkins Center for a Livable Future  
Johns Hopkins University  
Department of Environmental Health & Engineering  
Johns Hopkins Bloomberg School of Public Health

- 
- <sup>i</sup> Yip, C. S. C., Lam, W., & Fielding, R. (2017). A summary of meat intakes and health burdens. *European Journal of Clinical Nutrition*.
- <sup>ii</sup> Pan A, Sun Q, Bernstein AM, Manson JE, Willett WC, Hu FB. Changes in Red Meat Consumption and Subsequent Risk of Type 2 Diabetes Mellitus: Three Cohorts of US Men and Women. *JAMA Intern Med*. 2013;173(14):1328-1335. doi:10.1001/jamainternmed.2013.6633.
- <sup>iii</sup> American Dietetic Association. Position of the American Dietetic Association: Vegetarian Diets. *J Am Diet Assoc*. 2009; 109:1266-1282
- <sup>iv</sup> Crowe, F. L., Appleby, P. N., Travis, R. C., & Key, T. J. (2013). Risk of hospitalization or death from ischemic heart disease among British vegetarians and nonvegetarians: results from the EPIC-Oxford cohort study. *The American Journal of Clinical Nutrition*, 97(3), 597-603.
- <sup>v</sup> Schwingshackl, L., Hoffmann, G., Lampousi, AM. et al. *Eur J Epidemiol* (2017). Food groups and risk of type 2 diabetes mellitus: a systematic review and meta-analysis of prospective studies. doi:10.1007/s10654-017-0246-y
- <sup>vi</sup> Storhaug CL, Fosse SK, Fadnes LT. Country, regional, and global estimates for lactose malabsorption in adults: a systematic review and meta-analysis. *The Lancet. Gastroenterology & Hepatology*. 2017;2(10):738–746.
- <sup>vii</sup> Lifschitz C, Szajewska H. Cow’s milk allergy: evidence-based diagnosis and management for the practitioner. *European Journal of Pediatrics*. 2015;174:141-150. doi:10.1007/s00431-014-2422-3.
- <sup>viii</sup> U.S. Department of Health and Human Services and U.S. Department of Agriculture. *2015 – 2020 Dietary Guidelines for Americans*. 8th Edition. December 2015. Available at <https://health.gov/dietaryguidelines/2015/guidelines/>.