



February 10, 2025

Janet M. de Jesus, MS, RD
Designated Federal Officer, 2025 DGA
Office of Disease Prevention and Health Promotion
1101 Wootton Parkway, Suite 420
Rockville, MD 20852

Docket No. HHS-OASH-2024-0017

Dear Ms. de Jesus,

Thank you for the opportunity to comment on the 2025 Dietary Guidelines Advisory Committee (DGAC) Scientific Report (HHS-OASH-2024-0017). We are researchers at the [Johns Hopkins Center for a Livable Future](#) (CLF), an interdisciplinary academic center at the Johns Hopkins Bloomberg School of Public Health dedicated to advancing equitable, resilient, and sustainable food systems through science and systems-based approaches.

We urge the United States Department of Agriculture (USDA) and the Department of Health and Human Services (HHS) to adopt the scientific recommendations of the 2025 DGAC. The dietary guidelines play an essential role in shaping nutrition policies, federal food programs, and public health initiatives to help inform Americans' decisions about what foods to eat. Since their inception in 1980, the guidelines have been updated every five years to reflect the latest science, ensuring that dietary advice remains evidence-based and relevant to current health challenges. This expert panel of the DGAC, composed of leading scientists from across the country, employed rigorous research methods—including data analysis, food pattern modeling, and systematic reviews of current research—to shape its recommendations.

Support for emphasizing plant-based protein sources

We strongly support the DGAC's recommendations to emphasize greater consumption of beans, peas, lentils, and plant-based protein sources in the proposed Eat Health Your Way dietary pattern. Specifically, we encourage the following key updates to the Vegetable and Protein subgroup in the Dietary Guidelines for Americans (DGAs):

- 1) Reclassify beans, peas, and lentils from the vegetable food group to the protein food group, reinforcing their role as viable, nutritionally comparable alternatives to animal protein sources.

- 2) Ensure recommendations align with the best evidence to promote the health of Americans with reducing total protein foods by decreasing consumption from meat, poultry, and eggs.
- 3) Reorganize the order of the protein foods subgroup to list beans, peas, and lentils first, followed by nuts, seeds, and soy products, then seafood, and finally meat, poultry, and eggs – highlighting under-consumed nutrient-dense plant-based proteins. Encouraging Americans to eat more of this food group will increase health benefits, especially when replacing red and processed meat.

Public health rationale for these changes

The DGAs must align with the strongest available evidence to promote health, and the evidence is clear that reducing the intake of red and processed meat would have significant health benefits. The DGAC scientific report concluded that a diet lower in red and processed meat and higher in fruits, vegetables, and plant-based proteins is associated with a reduced risk of hypertension, type 2 diabetes, cardiovascular disease, and certain cancers.

While protein is essential for bodily functions – including tissue repair, metabolic regulation, and immune function – most Americans consume more protein than is required. Diets rich in legumes and plant-based proteins provide essential nutrients, which support digestive and heart health and help regulate blood sugar levels, reducing the risk of type 2 diabetes. However, despite these benefits, consumption of legumes and plant-based proteins remains significantly below recommended levels in the U.S. The emphasis should, therefore, shift toward higher-quality, plant-based proteins, which are associated with lower risks of chronic disease and improved long-term health outcomes.

Sustainability considerations

Beyond the significant benefits for diet-related disease outcomes, shifting dietary recommendations toward greater consumption of plant-based proteins like beans, peas, and lentils is critical for environmental sustainability and food security. Compared to food animal production, producing plant-based proteins requires significantly less water and land and has a smaller climate footprint. Additionally, legumes are among the most affordable and accessible sources of high-quality protein, making them a cost-effective option for individuals and families seeking nutritious diets. Legumes, including beans, peas, and lentils, are nitrogen-fixing plants that improve soil health and reduce the need for synthetic fertilizers, which also contribute to greenhouse gas emissions. To promote healthy dietary patterns, the DGAs need to reflect the realities of our food systems and incorporate consideration of the interrelationships between how food is produced and how it affects our health. This means recognizing the interconnections between how food is produced and how it affects human health, the environment, and economic access. Additionally, food affordability and accessibility depend on supply chains, food

subsidies, and agriculture policies that determine which foods are widely available and affordability—factors that influence the dietary patterns of millions of Americans.

Importance of DGAs for nutrition and agriculture programs

The Dietary Guidelines for Americans (DGA) serve as the foundation for federal nutrition programs, including the Supplemental Nutrition Assistance Program (SNAP), the National School Lunch Program (NSLP), and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), ensuring that millions of Americans have access to nutritionally balanced meals aligned with the latest scientific recommendations. Updating the DGAs to prioritize plant-based proteins may also support broader food policy reforms that benefit public health, including additional support for farmers growing sustainable crops and increased accessibility of plant-based protein options for consumers. Updating the DGAs to prioritize plant-based proteins may also support broader food policy reforms that benefit public health, including additional support for farmers growing sustainable crops and increased accessibility of plant-based protein options for consumers.

Conclusion

For these reasons, we strongly encourage the USDA and HHS to fully adopt the DGAC's common-sense recommendations, emphasizing plant-based protein sources, restructuring protein and vegetable food group classifications, and aligning dietary guidance with the latest public health and sustainability research. Adopting the committee's evidence-based recommendations is necessary to ensure the DGAs fulfill their role to provide credible, trustworthy information to the American public about diet and nutrition.

Thank you for your consideration.

Sincerely,

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