



February 10, 2025

Submitted electronically via www.regulations.gov

Janet M. de Jesus, MS, RD
HHS/OASH/ODPHP
1101 Wootton Parkway, Suite 420
Rockville, MD 20852

Re: Written Comments to HHS and USDA on the 2025-2030 Dietary Guidelines Advisory Committee Scientific Report; Docket HHS-OASH-2024-0017

Dear Ms. de Jesus:

FMI appreciates the opportunity to provide comments to Health and Human Services (HHS) and the United States Department of Agriculture (USDA) on the 2025-2030 Dietary Guidelines Advisory Committee Scientific Report. We appreciate the collective work of the Advisory Committee, HHS and USDA on the forthcoming 2025-2030 Dietary Guidelines for Americans (referred to in this document as *Dietary Guidelines*). As the food industry association, FMI works with and on behalf of the entire industry to advance a safer, healthier and more efficient consumer food supply chain. FMI brings together a wide range of members across the value chain — from retailers that sell to consumers, to producers that supply food and other products, as well as the wide variety of companies providing critical services — to amplify the collective work of the industry. www.FMI.org

Overview

FMI recognizes the key role of the *Dietary Guidelines* in federal nutrition policy, nutrition standards, and educational programs. FMI supports both the focus on a life stages approach as well as the continued focus on overall healthy dietary pattern, eating occasions, portion size, and culturally responsive approaches and interventions. Recommendations should be well-suited for the adoption of small behavior changes to improve the connection between food and beverages to better health for all Americans,

from infancy and childhood through adolescence and adulthood. Effective and achievable guidance aimed at improving the overall health of the nation must be both science-based and practical for consumers to apply to their personal lifestyle to achieve optimal health and well-being.

The 2025 Dietary Guidelines Advisory Committee (referred to in this document as The Committee) found that US dietary intakes do not align with *Dietary Guidelines* recommendations, regardless of age, race, ethnicity or socioeconomic group. Most individuals consume below recommended amounts of vegetables, fruits, dairy and fortified soy alternatives, seafood, nuts, seeds and whole grains. Low intakes of these food groups negatively affect nutrient intake throughout the lifespan, and many individuals simply do not consume enough vitamin D, calcium, potassium and fiber. The underconsumption of these nutrients is coupled with overconsumption of added sugars, saturated fat and sodium. Nearly all Americans can benefit from shifting to healthier overall patterns of eating inclusive of a variety of nutrient-rich foods.

Focus on Food Groups to Encourage for Healthy Eating Patterns

The Committee emphasizes the importance of consuming a healthy dietary pattern throughout the lifespan, as nutrition-related chronic diseases, such as obesity, heart disease and diabetes, pose a significant financial burden (\$700 billion annually) and threaten the population's health. The recommendations of the 2025-2030 Dietary Guidelines for Americans should prioritize promoting health. Specific efforts to help all Americans include food groups that provide good nutrition opens the door for the food industry to be a key ally in supporting consumer health with the grocery store as a destination for health and well-being. FMI is supportive of the noted evidence-based connections between the food groups specifically mentioned and their overall connection to improved health and we agree with the recommendations provided as part of the *Eat Healthy Your Way Dietary Pattern*.

FMI supports the Committee's recommendation to emphasize consumption of vegetables, fruits, legumes, whole grains, nuts, fish/seafood, low-fat or non-fat dairy while limiting red and processed meats, and foods high in saturated fat. The proposed *Eat Healthy Your Way Dietary Pattern* emphasizes dietary intakes of beans, peas and lentils while reducing intakes of red and processed meats, and has recommended moving beans, peas and lentils as a subgroup of the Vegetables Food Group to a subgroup of the Protein Foods Group to align with evidence provided around the encouragement of plant sources of protein. With this recommendation comes the

reorganization of the order of the Protein Foods Group to list Beans, Peas and Lentils first, followed by Nuts, Seeds and Soy Products, then Seafood, and finally Meats, Poultry and Eggs. We feel this recommendation is well supported by data and includes both plant and animal sources of protein for their varied nutrient contribution to support an overall healthy dietary pattern.

The Committee found that dietary patterns consistently related to optimal health are higher in vegetables, fruits, legumes (beans, peas, lentils), whole grains, nuts, fish/seafood, low-fat or non-fat dairy and vegetable oils higher in unsaturated fat, and lower in red and processed meats, sugar-sweetened beverages, refined grains and saturated fat. These healthy dietary patterns are associated with lower risk of type 2 diabetes, certain cancers and age-related cognitive decline.

Recommendations Must be Science-Based and Practical to Improve Public Health

FMI shares the common goal of improving public health and reducing diet-related chronic diseases while prioritizing nutrition activities and empowering consumers with information to make healthier choices. FMI also supports a science-based approach to federal dietary guidance and nutrition related policies that support the development of an overall healthy dietary pattern. It is critical that this is done in a way that provides consumers with clear, consistent nutrition information grounded in science.

FMI supports the Committee's recommendation that "future Dietary Guidelines Advisory Committees alternate between 5-year cycles in their focus to ensure that the scientific evidence of what Americans should eat is supported by robust science on how to eat and how to successfully implement that scientific advice." Notably, the Committee's report recommends that the next Committee be "composed of expertise in the disciplines of health equity, nutritional science, and behavioral and implementation sciences to assist HHS and USDA in their efforts to successfully implement dietary guidance for all Americans, regardless of this age, sex, race, ethnicity and/or socioeconomic position, to narrow the gap between scientifically robust dietary guidance and actual dietary consumption by the US population." FMI feels that alternating the Advisory Committee on 5-year cycles will lead to a more well-rounded review of the multitude of factors that affect nutrition decisions and eating patterns.

New Findings Included in the 2025 Committee Report

FMI appreciates the Committee's continued attention and thorough scientific review regarding the role of saturated and unsaturated fats in the diet. In particular, the

Committee addressed new topics, including food sources of saturated fat consumed and risk of cardiovascular disease; dietary patterns with varying amounts of ultra-processed foods; strategies for improving diet quality and weight management, which involved new reviews on portion size and frequency of meals and/or snacking; and practical guidance about how to feed younger children in terms of caregiver feeding styles and practices that support children's consumption of healthy foods.

Sources of Saturated Fat

The Committee found that replacing saturated fat with unsaturated fat, especially polyunsaturated fatty acids (PUFA), can reduce total and low-density lipoprotein cholesterol and the incidence of coronary heart disease events and cardiovascular disease mortality. The systematic review conducted found that reducing butter, processed and unprocessed red meat, and dairy by substituting these foods with plant-based protein sources such as beans, peas and lentils, whole grains, vegetables, and monounsaturated fatty acid and PUFA-rich vegetable oils and spreads is associated with reduced risk of cardiovascular disease.

The Committee's findings reinforce the current 2020-2025 *Dietary Guidelines* recommendations to limit total saturated fat intake to less than 10 percent of calories per day starting at age two by replacing it with unsaturated fat, particularly polyunsaturated fats.

Ultra-Processed Foods

The Committee responded to scientific questions on dietary patterns with varying amounts of ultra-processed foods (UPF), an area of recent nutrition research and an emerging topic of interest among public and federal nutrition scientists. The Committee was not able to draw conclusions about consumption of UPFs and health outcomes directly. The Committee recommends considering the association of UPFs with growth, body composition, and risk of obesity, and encouraging consumption of healthy dietary patterns at all stages of life and for diverse populations.

Current research does not definitively indicate whether UPF consumption is the cause of negative health outcomes or just a correlation. A standardized definition and research that accounts for nutritional quality is needed to fully understand the impact. Findings were reported around specific dietary patterns and prevalence of obesity, and the Committee noted the need for a standardized definition for ultra-processed foods to clarify research findings.

FMI supports the need for a more rigorous definition for UPFs. Developing an official, consistent evidence-based definition for ultra-processed foods that could be used across all agencies would be valuable to the food industry, health educators and consumers to alleviate confusion.

The term “ultra-processed food” was introduced in 2009 by researchers who questioned if levels of food processing directly impact health.¹ They developed the NOVA (or “new”) food classification system which has four distinct categories related only to extent and purpose of processing. The NOVA classification system does not consider nutritional quality or use for special dietary needs. It is very difficult to compare and/or combine research studies with variations of the NOVA definition noted even amongst researchers. The current (NOVA) definition of ultra-processed foods (UPF) lacks scientific consensus and therefore should not be used in policy and regulations. We urge the federal government to invest in research to address the gaps in mechanistic insights, especially of the NOVA 4 class (UPF) which consists of food products with a wide variety of nutritional quality.

The systematic review found that dietary patterns associated with obesity included cheeses, sugary drinks, processed foods, fast food, candies, snacks, cakes, animal products, whole milk and refined grains. It is well known that the overconsumption of foods and beverages high in calories, saturated fat, sodium and added sugars contribute to poor health in the US, particularly when these foods and beverages are low in nutritional value and consumed as part of a dietary pattern low in vegetables, fruits, whole grains and other foods recommended as part of the *Dietary Guidelines*.

The systematic review also found that the foods associated with the lowest risk of obesity are fruits, vegetables, whole grains, fish, nuts, legumes and yogurt. Research is still clarifying if any harmful effect from UPFs arise from the higher degree of processing or simply from the poorer nutritional quality often accompanying these types of foods. With a growing range of processed and “ultra-processed foods” available, some products may be a positive addition to a healthful diet.²

Examples of food classified as UPFs (according to the NOVA system) with health benefit:

¹Monteiro CA, Levy RB, Claro RM, Castro IR, Cannon G. A new classification of foods based on the extent and purpose of their processing. *Cad Saude Publica*. 2010 Nov;26(11):2039-49. doi: 10.1590/s0102-311x2010001100005. PMID: 21180977.

² The Nutrition Source, Harvard T.H. Chan School of Public Health
<https://nutritionsource.hsph.harvard.edu/processed-foods/> -

- 1) Whole grain breads and fiber-containing low-sugar breakfast cereals fortified with nutrients such as folic acid have been consistently linked with lower rates of heart disease and stroke and would likely classify as UPFs using the NOVA definition.³
- 2) Most yogurts on the market would be classified as UPFs, though FDA allows for the use of certain qualified health claims regarding the consumption of yogurt and reduced risk of type 2 diabetes.⁴

FMI supports the Committee's decision to not include recommendations on "ultra-processed food" consumption at this time. We agree with the Committee's recommendation that future Committees should continue to examine the association of "ultra-processed foods" with growth and body composition to improve the understanding of the role between processed foods and health outcomes.

Portion Size and Frequency of Meals and/or Snacking

FMI supports the Committee's recommendations on encouraging consumption of smaller portions of energy-dense foods for adults and children to stay within energy requirements, and larger portions of vegetables and fruits promoted strategically to increase consumption, particularly for children. These recommendations are in alignment with the work of the [Portion Balance Coalition](#) (PBC), a multi-sector collaborative of private, public, and non-profit leaders and organizations working together to achieve better nutrition for all by focusing on portions led by Georgetown University's Business for Impact Center at the McDonough School of Business. FMI and many FMI members are partner collaborators to PBC. Other PBC collaborators include prominent public health associations and hunger organizations, distinguished academic and biomedical researchers and scientists, large global food companies, leading industry trade associations, health systems and health professional associations, and federal agency liaisons.

The portion balance framework takes into account the three factors of volume (quantity), proportionality (variety), and quality (nutrient density), which are consistent with key principles from the *Dietary Guidelines*. Using this framework, PBC offers nutrition educators turnkey educational resources with the flexibility to customize materials to different audiences. Educational program materials include videos, slides,

³ The Nutrition Source, Harvard T.H. Chan School of Public Health
<https://nutritionsource.hsph.harvard.edu/processed-foods/>

⁴ <https://www.fda.gov/food/hfp-constituent-updates/fda-announces-qualified-health-claim-yogurt-and-reduced-risk-type-2-diabetes>

and suggested scripts. Most notably, PBC translated this framework into the consumer education [Eat for You Campaign](#), developed using a consensus-building approach with the PBC Scientific Advisory Board, registered dietitian nutritionists, SNAP-Ed, and community-based nutrition educators, along with consumers' lived experiences. Adjusting portion sizes for various food groups using an individual's hand as a guide is a practical application of portion balance.

Family Meals and Overall Healthy Eating Patterns

Food retailers are uniquely positioned to make family meals at home easier to accomplish. The FMI Foundation has created a nation-wide movement around family meals designed to make eating and cooking at home easier, more approachable, and more economical. It is the mission of the FMI Foundation to highlight the role of grocers and to bring our industry together around a family meal movement encouraging Americans across the country to "stay strong with family meals." To recognize the work FMI member companies and community collaborators are currently engaged in to promote family meals through the FMI Foundation, and for more information on the National Family Meals Movement visit www.fmi.org/family-meals/.

Our members and valued partners are committed to providing easy, affordable, and nutritious choices and meal solutions to help families stay strong for breakfast, lunch, snacks *and* dinner where they live, learn, work, play and gather.

Consumer research indicates that consumers are preparing a large portion of meals and snacks at home, relying heavily on foods purchased in the supermarket and online from retailers. Opportunity is ever-present to help individuals and families recognize the importance of the foods, beverages, and nutrients encouraged by the *Dietary Guidelines* and to help consumers build meals at home that provide nutritional advantages as part of a balanced diet.

To help bridge the gap on identified nutrients of public health concern, a strong focus on health as it relates to the regular inclusion of beneficial foods and beverages while grocery shopping, home cooking, and eating ultimately sets the stage for healthy habits that align with the *Dietary Guidelines*. As households plan and build family meals, there is opportunity to reaffirm the importance of beneficial food groups and beverages in overall healthy patterns of eating.

FMI's research, as well as other existing research, indicates that those who eat and cook more family meals at home include more fruits and vegetables and consume fewer

calories, fat and sugar. Furthermore, current and emerging research indicates children and adolescents who share family meals at home are more likely to be in a normal weight range and benefit from healthier dietary patterns and eating habits as well as stronger family connections and emotional well-being. FMI suggests continued consideration of the importance and role of family meals during the development of the *Dietary Guidelines*.

USDA MyPlate National Strategic Partnerships Across the Industry

The congruences between the FMI Family Meals Movement and USDA's MyPlate have long been recognized and FMI strongly supports elevating the shared messages of both initiatives. FMI strongly supports elevating the *Dietary Guidelines* through the promotion of USDA's MyPlate Program as a recognized National Strategic Partner.

MyPlate's National Strategic Partners consist of a variety of companies and organizations that join together to help promote the *Dietary Guidelines* and MyPlate. These organizations are national in scope and reach and also fulfill certain requirements including having a health mandate consistent with the *Dietary Guidelines* and a commitment to promoting nutrition content in the context of the entirety of the *Dietary Guidelines*. National Strategic Partner examples include large, national organizations such as healthcare corporations, media outlets, grocery retailers, health professional associations, restaurant chains, and food manufacturers to include many FMI members.

As a [MyPlate National Strategic Partner](#) for over a decade, FMI works closely with the Center for Nutrition Policy and Promotion. FMI and our members remain in step with the mission to raise awareness for MyPlate ensuring that more Americans have access to nutritious food and the tools they need to make healthier choices, all while recognizing the importance of keeping meals and snacks practical and meaningful. FMI and many of our members have continued to support and encourage policy efforts that align with the Dietary Guidelines as MyPlate partners.

In 2024, FMI strengthened our partnership with USDA's MyPlate by creating resources that spotlight both the year-round FMI Foundation Family Meals Movement and MyPlate with easy-to-use co-branded FMI Family Meals and MyPlate infographics. These free resources are available to the public at FMI and on the [MyPlate.gov](#) website.

Importance of Food Safety

Food safety was first introduced in the 2000 *Dietary Guidelines for Americans*, and FMI supports the continuation of recommendations related to food safety behaviors and

strongly supports additional education on the four basic messages of “Clean, Separate, Cook and Chill” to help consumers reduce the risk of foodborne illness. Simple steps and clear resources should be included in the *Dietary Guidelines* to keep Americans healthy and well and reduce the risk of foodborne illness in their own kitchens, especially as we know that more consumers are preparing and cooking more meals at home.

Recognizing that more consumers are preparing, cooking, and storing food at home, it is important to emphasize the importance of proper hygiene and food safety in the home environment. Safe food is fundamental to a healthy diet for all Americans. Food safety is the utmost priority for the entire food industry. Our members are continuously looking for improvements and additional ways to ensure a food safety culture exists across the food industry. FMI is a founding member of the Partnership for Food Safety Education (PFSE) and the public private partnership works to educate consumers on the importance of food safety. FDA, USDA and CDC are involved with the work of PFSE and we encourage food safety messaging to be a part of all education programs regarding healthy eating.

Food Industry Well-Poised as Partner to Support Dietary Guidelines

The grocery industry has long been committed to helping consumers achieve and maintain a healthful, balanced nutrient-rich diet. In local communities across the country, the food industry plays a vital role in advancing a safer, healthier, more efficient consumer food supply chain, ensuring that local grocers are able to meet the needs of consumers both in the supermarket and online. Food retailers have created a marketplace for healthy, accessible, nourishing food choices, along with information about health and well-being. Product suppliers and manufacturers work to ensure nutrient-rich choices are widely available to meet varied consumer needs. Together retailers, suppliers and manufacturers continually strive for innovative consumer-friendly ways to facilitate healthy choices and eating behaviors among shoppers.

Food industry partners have the ability to provide everyday food and beverage solutions, right in the grocery store aisles, to help consumers more closely adhere to the *Dietary Guidelines*, if they are clearly stated, easy to follow, based on science and practical to apply. When the *Dietary Guidelines* are easy to interpret and practical to follow, retailers, suppliers and manufacturers are well enabled to support consumers by providing simple messaging and innovative solutions to boost adherence and alignment when shopping, cooking, and eating. FMI supports the work of our industry members

and collaborators as key partners for health and well-being in the communities they serve.

As detailed in the FMI report *Food Industry Contributions to Health & Well-being 2024*,⁵ most retailers in the supermarket industry now employ registered dietitian nutritionists (RDNs) at the corporate or store level to assist in strategic innovation, nutrition messaging and personalized choices for consumers looking to improve health and stay well at all stages of life. With the input of RDNs and nutrition professionals, retailers provide meal and snack solutions for consumers, accurate nutrition labeling, guidance, and support for convenient, nourishing, enjoyable food solutions. Many suppliers and manufacturers also employ registered dietitians for their knowledge of and experience with science, labeling regulations, nutrients, ingredients, allergens, supplements, health messaging and overall strategic innovation related to diet and health in the food industry. This internal focus on health and well-being uniquely positions the food industry to help consumers with evidence-based, practical ways to encourage healthy dietary patterns and eating behaviors. Consumers will continue to look for support and guidance with improved health and overall well-being, and the grocery industry is well poised to reinforce the recommendation of the *Dietary Guidelines* and consistently provide personalized choice with a variety of items recognized as nutritious.

The 2025 Committee emphasized the importance of extending its evidence review beyond *what* a healthy dietary pattern is to *how* to support consumption of a healthy dietary pattern across the lifespan. FMI and our members will continue to help guide and empower consumers to make personalized food and beverage choices to build healthy dietary patterns. The Committee gave consideration not only to recommendations regarding the amounts and types of foods to consume but also evaluated the effectiveness of strategies—including frequency of meals/snacks, breakfast consumption, portion size, and child feeding styles and practices—for achieving a healthy dietary pattern.

As more Americans look to stay healthy and well, variety and choice provided by retailers, along with education and encouragement by registered dietitians, nutrition and health professionals can lead to gradual adoption of healthy eating habits more closely aligned with the *Dietary Guidelines* to improve public health, particularly if recommendations are clearly grounded in science and practical for consumers to apply.

⁵ <https://www.fmi.org/forms/store/ProductFormPublic/2024-report-on-food-industry-contributions-to-health-wellbeing>

Comprehensive Dietary Guidance Education Campaign

FMI supports continued and comprehensive consumer education on existing nutrition tools and information including food groups to encourage, nutrients to limit, the Nutrition Facts Label, the *Dietary Guidelines* and MyPlate. When all of these dietary guidance tools are used in combination, consumers are best positioned to use evidence-based information to evaluate how foods and beverages fit into their own personal overall diet. FMI created a new Nutrition Infographic in 2024 to help our industry members understand the interactions between all dietary guidance components to work with consumers in a meaningful way aligned with the *Dietary Guidelines*, MyPlate and the Nutrition Facts Label.⁶

CONNECTING FOOD AND NUTRITION TO HEALTH AND WELL-BEING

Use Evidence-Based Guidance to Make Informed Decisions

AN OVERALL HEALTHY PATTERN OF EATING IS ALL ABOUT **BALANCE AND CHOICE**

Grain
Whole Grain Cereal

Dairy
Vanilla Greek Yogurt

Fruit

- Fresh Banana
- Dried Cherries
- Frozen Berries
- 100% Fruit Juice
- Canned Peaches

Grains

- Tortilla Chips
- Rice

Protein

- Meat
- Poultry
- Shrimp
- Beans

Dairy

- Cheese

Fruits & Vegetables

- Tomato
- Lettuce
- Corn

MyPlate.gov

What Are the Basic Dietary Guidelines for Americans?

Fruits & Vegetables

- Variety with meals and snacks
- ~5 servings / day

Protein

- Focus on lean options
- Seafood 2x / week
- Beans, Legumes, Nuts & Seeds
- 2 servings / week

Grains

- 3 whole grain servings / day

Dairy or Soy Alternative

- ~2-3 servings / day

General guidelines include heart-healthy fats and oils and water for hydration.

Keep Portions in Check

The Portion Balance Coalition: Eat for You Campaign shows how your hand can help guide portion sizes.

A Handful of Nuts

How Can You Tell If a Food or Beverage is High or Low in a Nutrient?

FDA.gov

Nutrition Facts Label

FDA considers foods with nutrients:

HIGH

- At or above 20% Daily Value as being high in those nutrients

LOW

- At or below 5% Daily Value as being low in those nutrients

The percent Daily Value (%DV) shows how much a nutrient in a serving of food contributes to a daily diet, including healthful nutrients such as:

Fiber Calcium Iron

Potassium Vitamin D

The %DV also works for nutrients to limit:

Saturated Fat Sodium Added Sugars

10g/day 2300mg/day 50g/day

www.FMI.org/healthandwellbeing

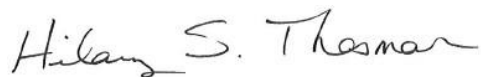
Our members and valued partners are committed to providing easy, affordable, and nutritious choices and meal solutions to help families stay strong for breakfast, lunch, snacks and dinner where they live, learn, work, play and gather. As noted, many are

⁶ https://www.fmi.org/docs/default-source/health-wellness-resources-downloads/fmi-nutrition101-infographic-final.pdf?sfvrsn=787e5cc5_1

USDA MyPlate National Strategic Partners using the foundational recommendations of the *Dietary Guidelines* to help consumers navigate the grocery store as a destination for health and well-being. Education is critically important to improve overall dietary patterns with a focus on the food groups to include in alignment with the *Dietary Guidelines* and the positive beneficial nutrients included in those food groups.

FMI greatly appreciates the opportunity to comment on the Advisory Committee Scientific Report and future implications for the 2025-2030 *Dietary Guidelines*. We look forward to further dialogue and collaboration with the agencies and would be pleased to provide any further information that would be helpful.

Sincerely,

A handwritten signature in black ink that reads "Hilary S. Thesmar". The signature is fluid and cursive, with the first name being the most prominent.

Hilary Thesmar, PhD, RD, CFS
Chief Science Officer and SVP Food and Product Safety

A handwritten signature in black ink that reads "Krystal Register". The signature is stylized and cursive, with the first name being the most prominent.

Krystal Register, MS, RDN, LDN
Vice President, Health and Well-Being