



May 16, 2022

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Office of Disease Prevention and Health Promotion (ODPHP)
Office of Assistant Secretary for Health (OASH), HHS
1101 Wootton Parkway
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Submitted electronically via www.regulations.gov

Re: Request for Comments on Scientific Questions to Be Examined to Support the Development of the Dietary Guidelines for Americans 2025-2030
(Document ID - HHS-OASH-2022-0005-0001)

Dear Ms. de Jesus:

FMI - The Food Industry Association (FMI) appreciates the opportunity to provide comments on the *Scientific Questions to Be Examined to support the Development of the Dietary Guidelines for American 2025-2030*. 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.

Questions and Responses:

Dietary Patterns Across Life Stages

Original Question: What is the relationship between dietary patterns consumed and overall health including the following: growth, size, body composition, risk of overweight and obesity, and weight loss and management?

Suggested New Question: What is the relationship between dietary patterns consumed that closely align with the 2020-2025 Dietary Guidelines and overall health outcomes

including growth and developmental milestones for children, body composition and risk of overweight and obesity for adults, weight loss and management?

Response: We suggest changing this question to focus on healthy eating patterns and the relationship between optimal health and dietary patterns more closely aligned with the 2020-2025 Dietary Guidelines. Exploration of the common factors amongst individuals who are otherwise in good health would be beneficial to expand on to identify successful simple strategies to help Americans adhere more closely to the guidelines. If positive common factors are identified, the true intent of the Dietary Guidelines remains focused on healthy eating patterns for the prevention of diet-related disease and the promotion of overall health. This exploration should include any educational tools, programs, specific and practical guidance that resonate most with different age groups, cultures, education levels, etc.

We encourage the Dietary Guidelines Advisory Committee to address positive nutrition recommendations and focus on eating patterns that support health. Health promotion includes positive messaging. Focusing on risk and specific disease states could lead to very narrow research studies and not general recommendations to inform the dietary guidelines.

We know that the general public is confused with ever changing dietary recommendations. Consumers want to know what to eat more of and how to improve and maintain health. We encourage the committee to evaluate the science based on positive outcomes and develop positive recommendations. Healthy eating patterns and healthy lifestyles should be the focus of the questions and the report.

Original Question: What is the relationship between consumption of dietary patterns with varying amounts of ultra-processed foods and growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance?

Suggested New Question: What is the relationship between consumption of dietary patterns with varying amounts of nutrient rich versus nutrient poor foods and growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance?

Response: All food groups and foods, including processed foods, can be a part of healthy diet. The amount of processing a food undergoes does not indicate the nutritional value of the food. Many foods are processed to make them edible, palatable and/or safe. For this reason, we suggest a change to this question. We propose that instead of a focus on

“ultra-processed foods” the question should focus on nutrient dense versus nutrient poor foods and beverages as a significant portion of overall calories consumed and the effect of nutrition on overall health status, rather than the effect of processing.

We are more concerned about the nutrient value of foods than the form. In most cases, processing is necessary to make the product able to be consumed and can have impact on overall nutrient availability.

The FDA definition of manufacturing/processing follows:

Manufacturing/processing means making food from one or more ingredients, or synthesizing, preparing, treating, modifying or manipulating food, including food crops or ingredients. Examples of manufacturing/processing activities include: Baking, boiling, bottling, canning, cooking, cooling, cutting, distilling, drying/dehydrating raw agricultural commodities to create a distinct commodity (such as drying/dehydrating grapes to produce raisins), evaporating, eviscerating, extracting juice, formulating, freezing, grinding, homogenizing, irradiating, labeling, milling, mixing, packaging (including modified atmosphere packaging), pasteurizing, peeling, rendering, treating to manipulate ripening, trimming, washing, or waxing. For farms and farm mixed-type facilities, manufacturing/processing does not include activities that are part of harvesting, packing, or holding.¹

The USDA definition of processed foods follows:

Processed food item means a retail item derived from a covered commodity that has undergone specific processing resulting in a change in the character of the covered commodity, or that has been combined with at least one other covered commodity or other substantive food component (*e.g.*, chocolate, breading, tomato sauce), except that the addition of a component (such as water, salt, or sugar) that enhances or represents a further step in the preparation of the product for consumption, would not in itself result in a processed food item. Specific processing that results in a change in the character of the covered commodity includes cooking (*e.g.*, frying, broiling, grilling, boiling, steaming, baking, roasting), curing (*e.g.*, salt curing, sugar curing, drying), smoking (hot or cold), and restructuring (*e.g.*, emulsifying and extruding). Examples of items excluded include roasted peanuts, breaded chicken tenders, and fruit medley.²

¹ 21 CFR 117.3

² 7 CFR 65.220

Most importantly, processing often has a role in food safety and food preservation. These are critically important functions that have allowed our food system to expand the availability and diversity of food in communities across the U.S. year-round. Accessibility, convenience and affordability must be taken into consideration when making recommendations that support healthy eating patterns that allow consumers to have an enjoyable eating experience and that meet their specific needs. Additionally, most food that we consume needs to be processed in order to be edible and digestible. There are very few products that are edible as raw agricultural commodities.

We are also sensitive to concerns about promoting some foods as healthier or better for you when the science does not support differences. Examples include organic products vs conventional and fresh vs frozen. Many families are just trying to make ends meet and if they can purchase more canned or frozen food with their food dollars, they should not be led to think that fresh, non-processed foods are healthier or safer. In addition, we know there are significant differences in cost and reduction of food waste.

Since there is not one accepted definition of ultra-processed food, we see several potential difficulties that will need to be considered in order to conduct a systematic review of the question regarding "ultra-processing" as presently worded. If the committee is charged with addressing the definition of ultra-processed, we strongly recommend that the committee contain experts or consult with experts in food processing.

Several challenges with identifying and evaluating available research are outlined below.

- Several methods of classifying foods by level of processing are currently used but there is no consistent definition of "ultra-processed" foods.³ Use of different classification systems alters estimates of intakes of processed foods^{4 5}, leading to

³ Sadler CR, Grassby T, Hart K, Raats M, Sokolović M, Timotijevic L. Processed food classification: conceptualisation and challenges. *Trends Food Sci Technol.* 2021; 112:149-62. doi.org/10.1016/j.tifs.2021.02.059

⁴ Crino M, Barakat T, Trevena H, Neal B. Systematic review and comparison of classification frameworks describing the degree of food processing. *Nutr Food Technol.* 2017; 3(1). doi <http://dx.doi.org/10.16966/2470-6086.138>

⁵ de Araújo TP, de Moraes MM, Afonso C, Santos C, Rodrigues SSP. Food processing: comparison of different food classification systems. *Nutrients* 2022; 14:729. doi.org/10.3390/nu14040729

marked differences in associations between ultra-processed food consumption and health outcomes.⁶

- Food frequency questionnaires widely used in observational epidemiology studies are designed to estimate energy and nutrient intakes but are not sufficiently detailed to accurately assess degree of processing. Use of tools not validated to estimate ultra-processed food consumption may lead to misclassification of foods by processing category and misinterpretation of associations with health markers.⁷
- Inter-rater reliability varies when coding individual food items by processing level, both across and within different classification systems^{8 9 4}, introducing another potential source of misclassification error.
- The categorization of foods as “ultra-processed” refers more to their composition and role in the diet rather than to processing methods applied.^{10 11}

In any review of publications on consumption of ultra-processed foods and health-related outcomes, it will be necessary to consistently define what is meant by “ultra-processed” foods, address issues related to potential misclassification, and control for confounding related to nutrient composition and energy density.

We strongly encourage the formation of questions that focus on the promotion of health and prevention of diet related chronic diseases based on the body of literature available.

⁶ Martinez-Perez C, San-Cristobal R, Guallar-Castillon P, Martínez-González MÁ, Salas-Salvadó J, Corella D, Castañer O, Martínez JA, Alonso-Gómez ÁM, Wärnberg J, et al. Use of different food classification systems to assess the association between ultra-processed food consumption and cardiometabolic health in an elderly population with metabolic dyndrome (PREDIMED-Plus Cohort). *Nutrients* 2021;13:2471. doi.org/ 10.3390/nu13072471

⁷ Marino M, Puppo F, Del Bo, C, Vinelli V, Riso P, Porrini M, Martini D. A systematic review of worldwide consumption of ultra-processed foods: findings and criticisms. *Nutrients* 2022; 13:2778. doi.org/10.3390/nu13082778

⁸ Bleiweiss-Sande R, Chui K, Evans EW, Goldberg J, Amin S, Sacke J. Robustness of food processing classification systems. *Nutrients* 2019; 11:1344. doi:10.3390/nu11061344

⁹ Braesco V, Souchon I, Sauviant P, Haurogné T, Maillot M, Féart C, Darmon N. Ultra-processed foods: how functional is the NOVA system? *Eur J Clin Nutr.* 2022. doi.org/10.1038/s41430-022-01099-1

¹⁰ Botelho R, Araújo W, Pineli L. Food formulation and not processing level: conceptual divergences between public health and food science and technology sectors. *Critical Rev Food Sci Nutr.* 2018; 58:4, 639-650, doi:10.1080/10408398.2016.1209159

¹¹ Gibney MJ, Forde CG. Nutrition research challenges for processed food and health. *Nature Food.* 2022; 3:104-9. doi.org/10.1038/s43016-021-00457-9

Specific Dietary Pattern Components

Original Question: What is the relationship between food sources of added sugars consumed and growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance and risk of type 2 diabetes?

Suggested Change to Question: What is the relationship between food sources of added sugars consumed and growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance and risk of type 2 diabetes and intakes of positive food groups and nutrients?

Response: Many nutrient rich foods are enhanced with added sugars for taste, acceptance and enjoyment by Americans of all ages. For this reason, we suggest a change to this question to explore how Americans are successfully including otherwise nutrient rich foods with added sugar for nutrition benefit in an overall healthy pattern of eating.

Strategies for Individuals and Families Related to Diet Quality & Weight Management

Original Question: What is the relationship between specific food-based strategies during adulthood and body composition, risk of overweight and obesity, and weight loss and maintenance?

Response: We support the overall concept of this question but we ask for clarification on how "food-based strategies" is being defined. Furthermore, what specific food-based strategies will be evaluated? It would be beneficial to highlight specific registered dietitian led strategies that are most helpful to consumers, drive behavior change and build healthy habits to include but not limited to: shopping tips, food storage and preparation guidance, home food safety tips and guidelines, affordable meal solutions, nutrient rich snack ideas, culturally inclusive recipes and ideas, inclusion of foods and beverages that align with the Dietary Guidelines in all forms, etc.

Food Pattern Modeling

Response: We appreciate the acknowledgement that food pattern modeling methodology continues to evolve to reflect variability in intakes and a range of possible healthy dietary patterns. It is important to recognize that changes to dietary patterns may include increases or decreases in amounts of food groups/subgroups and/or

recategorization of food groups/subgroups, as well as subsequent changes to calories available for other uses, including for added sugars.

With the evolution and consumer focus on “plant-based” foods and beverages, we suggest exploring the relationship between overall patterns of eating that include more plant foods: fruits, vegetables, beans, peas, lentils, nuts, seeds, grains (whole, staple and bran), plant-based oils and fats, as well as plant-based dairy alternatives and plant-based meat and poultry analogues, and the prevention of disease and promotion of health. There is opportunity to level set and define a “plant forward” diet or approach to eating as a pattern of eating that aligns with the Dietary Guidelines for overall health.

Additional topics

We support the inclusion of additional topics in the *Dietary Guidelines for Americans, 2025-2030* using evidence-based guidance developed across Federal government agencies. The topics that should be addressed include but are not limited to:

- Healthy Food Environments (e.g., [Community Preventive Service Task Force findings](#))
- Healthy School Environments ([Healthy Schools | CDC](#))
- Food Safety (e.g., [FoodSafety.gov](#))
- Specific Nutrient Recommendations ([Dietary Reference Intakes](#))
- Human milk, infant formula, and health outcomes (e.g., Forthcoming Federal Systematic Reviews)
- Seafood (e.g., [FDA/EPA Advice about Eating Fish](#))
- Eating Disorders (e.g., [National Institute of Mental Health](#))
- Physical Activity ([Physical Activity Guidelines for Americans](#))

Recommended References relevant to “ultra-processed foods”:

Bleiweiss-Sande R, Chui K, Evans EW, Goldberg J, Amin S, Satchek J. Robustness of food processing classification systems. *Nutrients* 2019; 11:1344. doi:10.3390/nu11061344

Botelho R, Araújo W, Pineli L. Food formulation and not processing level: conceptual divergences between public health and food science and technology sectors. *Critical Rev Food Sci Nutr.* 2018; 58:4, 639-650, doi:10.1080/10408398.2016.1209159

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de Araújo TP, de Moraes MM, Afonso C, Santos C, Rodrigues SSP. Food processing: comparison of different food classification systems. *Nutrients* 2022; 14:729. doi.org/10.3390/nu14040729

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Jones J.M. Food processing: Criteria for dietary guidance and public health? *Proceedings of the Nutrition Society*, 78 (1) (2019), pp. 4-18, [10.1017/S0029665118002513](https://doi.org/10.1017/S0029665118002513)

Martinez-Perez C, San-Cristobal R, Guallar-Castillon P, Martínez-González MÁ, Salas-Salvadó J, Corella D, Castañer O, Martinez JA, Alonso-Gómez ÁM, Wärnberg J, et al. Use of different food classification systems to assess the association between ultra-processed food consumption and cardiometabolic health in an elderly population with metabolic syndrome (PREDIMED-Plus Cohort). *Nutrients* 2021;13:2471. doi.org/10.3390/nu13072471

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Sadler CR, Grassby T, Hart K, Raats M, Sokolović M, Timotijevic L. Processed food classification: conceptualisation and challenges. *Trends Food Sci Technol.* 2021; 112:149-62. doi.org/10.1016/j.tifs.2021.02.059

National Academies of Sciences, Engineering, and Medicine 2017. *Redesigning the Process for Establishing the Dietary Guidelines for Americans*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/24883>.

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We appreciate the opportunity to submit comments on the questions for the committee. We welcome additional opportunities to engage during the process to develop the 2025-2030 Dietary Guidelines for Americans.

Sincerely,

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