



Institute for Agriculture and Trade Policy

May 8, 2015

Dear Secretary Burwell and Secretary Vilsack,

I am submitting comments on behalf of the Institute for Agriculture and Trade Policy (IATP) on the Scientific Report of the 2015 Dietary Guidelines Advisory Committee. IATP strongly urges the Department of Health and Human Services (HHS) and the U.S. Department of Agriculture (USDA) to adopt the recommendations of the Dietary Guidelines Advisory Committee (DGAC) to integrate Sustainability as an essential criteria for the dietary guidelines.

The DGAC adopted the following definitions from the United Nations Food and Agriculture Organization (FAO) which we consider a sound basis for the Guidelines:

Sustainable diets: Sustainable diets are a pattern of eating that promotes health and well-being and provides food security for the present population while sustaining human and natural resources for future generations.

Food security: Food security exists when all people now, and in the future, have access to sufficient, safe, and nutritious food to maintain a healthy and active life.

In 2013, USDA's peer-reviewed report, *Climate Change and Agriculture: Effects and Adaptation* (co-authored by 56 experts across the government, university system and non-governmental organizations) found that the impacts of climate change on crops and livestock production systems over the next 25 years will be "mixed," while "continued changes by mid-century and beyond, however, are expected to have generally detrimental effects on most crops and livestock." The findings of the report point to an urgent need to assess our food production system and strengthen practices that create resiliency in the face of finite natural resources and climate change. Our food consumption choices are the other side of the coin. The 2015 Report shows that healthy food consumption can and must also translate into healthy food production for the planet. The 2015 Dietary Guidelines are an opportunity for the HHS and the USDA to play a leadership role and integrate this critical aspect of sustainability—the future of our food system—into federal policy on nutrition and food security.

The DGAC states:

Linking health, dietary guidance, and the environment will promote human health and the sustainability of natural resources and ensure current and long-term food security.

The availability and acceptability of healthy and sustainable food choices will be necessary to attain food security for the U.S. population over time.

And that a more sustainable diet:

...can be achieved through a variety of dietary patterns, including the Healthy U.S.-style Pattern, the Healthy Mediterranean-style Pattern, and the Healthy Vegetarian Pattern. All of these dietary patterns are aligned with lower environmental impacts and provide options that can be adopted by the U.S. population. Current evidence shows that the average U.S. diet has a larger environmental impact in terms of increased greenhouse gas emissions, land use, water use, and energy use, compared to the above dietary patterns. This is because the current U.S. population intake of animal-based foods is higher and plant-based foods are lower, than proposed in these three dietary patterns.

Based on the evidence examined, the 2015 DGAC report recommends a healthy dietary pattern to be:

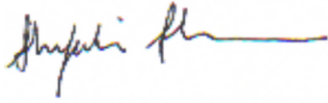
- *Higher in vegetables, fruits, whole grains, low- or non-fat dairy, seafood, legumes, and nuts; moderate in alcohol (among adults)*
- *Lower in red and processed meats*
- *Low in sugar-sweetened foods and drinks and refined grains*

Contrary to the meat industry's attack on these guidelines, DGAC does not suggest that any food group need be eliminated completely to improve nutrition or sustainability outcomes. IATP supports this view. Ecologically sound, humane and healthy methods of livestock raising exist and should be encouraged. IATP, therefore, also endorses the *Comments from Sustainable Livestock Farmers on the 2015 Dietary Guidelines Advisory Committee Recommendations* to distinguish between factory farmed meat and grass-fed beef. Corn-fed, feedlot beef is much higher in saturated fats and harmful to the environment, animals and humans than beef produced from a rotational grazing approach. The latter not only leads to healthier animals and therefore more nutritious meat, but also helps sequester carbon, improve soil fertility and conserve water.

Given that the Guidelines inform the design and implementation of federally funded nutrition programs such as the School Nutrition Program and the Women, Infants and Children program, these recommendations could help the government encourage the procurement of healthier and more nutritious food and at the same time incentivize more resilient food production methods that help our country adapt to climate change.

We urge the HHS and USDA to follow a science-based approach that includes sustainability in the 2015 guidelines to ensure that the present and future generations of Americans have access to healthy and nutritious food.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shefali Sharma', followed by a horizontal line.

Shefali Sharma
Director, Agricultural Commodities and Globalization Initiative
Institute for Agriculture and Trade Policy (IATP)