

NFSN's Comments on Dietary Guidelines for Americans

Thank you for the opportunity to offer commentary on the proposed scientific questions for review of the Dietary Guidelines for Americans. National Farm to School Network works toward a vision of a strong and just food system for all, and we seek deep transformation toward this vision through farm to school. Our stakeholders work at the intersections of child nutrition programs, education, and our food system, and therefore have a passion for ensuring that the guidance issued from USDA reflects a focus on life-long health and an understanding of the equity impacts as guidelines are implemented.

Health as the Primary Focus of a Scientific Dietary Guidelines Process

NFSN is pleased to see the stated commitment to evaluating all scientific questions and findings through an equity lens. However, this stated purpose conflicts with the increased emphasis of the proposed questions on weight, weight management, and weight loss as a primary goal of the Dietary Guidelines for Americans. We are dismayed by increased emphasis throughout the questions on weight as the main marker for health and as the most important goal of dietary quality. Body mass index, the most common measure of body composition used in implementation of weight management programs, is an inherently flawed and racially biased metric. Weight stigma, particularly when it intersects with racial bias, results in tangible harms such as [poorer medical care](#). Any scientifically rigorous review should interrogate whether BMI is relevant to the main scope of DGA. The scientific questions should focus on understanding the evidence that supports guidance for consumers and nutrition programs on promoting longer, healthier lives.

Moreover, as NFSN represents a community of people who care about children's mental and physical health, we believe strongly that the Dietary Guidelines informing standards for federal child nutrition programs should focus on the evidence that improves specific chronic disease and well-being outcomes for children and youth regardless of their weight status. Despite saying that children will not be considered as a population for weight loss, the increased emphasis on this as the main goal of dietary patterns will inform the field as a whole. Throughout this process, USDA should ensure that any implementation of recommendations do not further [marginalize overweight and obese children](#).

Sustainability and Health Are Interdependent

NFSN stakeholders work closely with the producers and communities who provide child nutrition programs with whole, fresh, and unprocessed foods that nourish kids and shape lifelong food behaviors. The ability to consume a healthy diet as defined by the DGA depends in large part on whether our planet can support its production. Thus an examination of evidence for the "best" diet cannot ignore the sustainability impact of its production.

Commentary on Specific Proposed Question Areas

Dietary Patterns Across Life Stages

We commend the effort to examine the impact of ultra-processed foods, and urge that examination to focus on evidence of chronic disease and lifespan rather than obesity as a primary metric. We also commend the examination of evidence supporting healthy pregnancy and lactation outcomes, especially through measures with real health impact, such as pre-term birth and infant birth weight, rather than maternal weight or postpartum weight loss.

Specific Dietary Pattern Components

We support the effort to examine the influence of added sugars, beverage choices, and saturated fat. In particular, we are interested in closely examining the strength and direction of scientific evidence regarding milk (regarding milk fat and added sugars) because of its role in child nutrition programs.

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

We are pleased to see an inquiry into the role of repeated food exposures in childhood influencing diet quality later in life. We support further research into how diverse food exposures can not only lead to potentially greater alignment with DGA in food choices, but can provide skills for more varied, empowered, and culturally relevant healthy food choices that support individuals' health across all weight status.

Food Pattern Modeling

Modeling and promoting “healthy food patterns” is one of the most influential ways that the DGA and USDA impact the field of nutrition as a whole, even beyond direct child nutrition programs. There is a tremendous need to support consumers and child nutrition professionals with information that a variety of culturally appropriate meal patterns can support a healthy lifespan. The 2020 DGA noted the growing acknowledgment of “the reality that people do not consume nutrients or foods in isolation but in various combinations over time. It also reflects growing evidence that components of a dietary pattern may have interactive, synergistic, and potentially cumulative relationships that can predict overall health status and disease risk more fully than can individual foods or nutrients.” We support building on this lifespan approach to further recognize the importance of Indigenous and traditional foodways and culturally relevant meals as models to incorporate in nutrition promotion and child nutrition programs.

We appreciate the opportunity to inform the scientific review process at the outset as the Committee undertakes its Dietary Guidelines update process.

Sincerely,
National Farm to School Network