January 30, 2025

Janet de Jesus, MS, RD
Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary for Health
Department of Health and Human Services
1101 Wootton Parkway, Suite 420
Rockville, MD 20852

Re: Request for Public Comments on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee (Docket No. HHS-OASH-2024-0017)

Dear Ms. de Jesus,

Dairy Council of California appreciates the opportunity to submit comments for consideration by the U.S. Departments of Agriculture (USDA) and Health and Human Services (HHS) on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee (Scientific Report).

As a science-based nutrition organization, Dairy Council of California collaborates with partners to elevate the health of children and communities through the pursuit of lifelong healthy eating patterns. Funded by California's dairy farm families and milk processors and under the guidance of California Department of Food and Agriculture, Dairy Council of California's registered dietitian nutritionists and experts in nutrition science, education, agricultural literacy and community health engage with a variety of partners in school, health care and community settings, working together to achieve nutrition security. Each year these collective efforts improve access to nutritious foods and provide nutrition education and resources for millions of people in California, across the nation and beyond, demonstrating the dairy community's contribution to sustainable nutrition and community health.

Dairy Council of California commends the efforts of the Dietary Guidelines Advisory Committee (Committee) to apply a health equity lens in the evidence review process and focus on flexibility and inclusion in its recommendations to meet the needs of a diverse population. As the Committee addresses in the Scientific Report, many health disparities exist in the United States, particularly affecting underserved racial and ethnic groups. Furthermore, people in critical life stages, including early childhood, adolescence, pregnancy and lactation, and older adulthood, face unique nutritional challenges.

Dairy Foods Support Health at All Life Stages

The Scientific Report acknowledges that diet quality is relatively higher in early childhood compared to later childhood and adolescence. Poor nutrition during adolescence, a period of rapid growth and development, is particularly concerning for females due to the potential for intergenerational impacts as they grow and have their own children. Additionally, poor eating patterns in early childhood and adolescence can continue into adulthood, increasing the risk for

becoming overweight and developing chronic conditions such as heart disease. Nutrient-dense foods help lay the foundation for a healthy eating pattern, and prioritizing food groups has the potential to positively impact health by encouraging people to eat foods that align more closely with dietary recommendations. Currently, many Americans are underconsuming vegetables, fruits and dairy, resulting in nutrient gaps.[1]

Consuming the recommended daily amount of dairy foods can help close the gap on some nutrient intakes, including nutrients of concern such as calcium, vitamin D and potassium. Bone health is particularly important during adolescence and into early adulthood when peak bone mass is achieved, as well as during periods of rapid bone remodeling for post-menopausal women. Dairy foods supply key nutrients for bone growth and development, and daily intake of these foods as part of an overall healthy pattern contributes to health far beyond childhood and into older adulthood. As noted in the Scientific Report, adolescent females are particularly vulnerable to nutrient shortfalls that can persist into young adulthood, impacting pregnancy and lactation. Dairy like milk, yogurt and cheese is one of the largest food group contributors of iodine in the diet, and decreasing rates of milk consumption among U.S. women and girls may be associated with their declining iodine status. Iodine is an essential nutrient that is crucial for cognitive development during infancy. Iodine needs increase by more than 50% during pregnancy, making adequate consumption particularly important during this unique window of opportunity during gestation and into the early years of a child's growth and development.[2] Iodine consumption decreased for most U.S. women and girls between 2011 and 2020, with consumption being lowest among non-Mexican Hispanic women and Black women of reproductive age.[3]

Supporting Diverse Food Preferences Can Help Reduce Health Disparities

Among racial and ethnic groups in the United States, the Scientific Report emphasizes that non-Hispanic Black individuals are at greatest risk for nutrient shortfalls. Black Americans face health disparities at every life stage, from higher rates of maternal and infant mortality to higher rates of chronic disease and a shorter life span. Alongside health and nutrition disparities, there is a gap in dairy consumption related to socioeconomic status, race and ethnicity, with one of the lowest consumptions among non-Hispanic Black Americans. Research shows that Black Americans underconsume dairy foods relative to recommendations and consume more fast foods and sugar-sweetened beverages than any other ethnic group.[4] Nutritious foods like milk, lactose-free milk, yogurt and cheese can be part of the solution to improving health equity and reducing risk of chronic diseases.[5] Through the lens of health equity, the Committee analyzed nutrient profiles across life stages and ethnic groups and noted differences in proportion of foods consumed between groups. For example, when looking at the Dairy food group, non-Hispanic Black Americans consumed proportions of cheese at higher rates than milk and yogurt. Cheese naturally provides a unique matrix of nutrients and bioactive components that contribute to health regardless of fat levels. Acknowledging diverse food preferences will support improved dietary patterns, as cheese and other nutrient-dense dairy foods can be incorporated into a wide variety of culturally relevant meals to improve diet quality and achieve nutrition security.

Flexibility in the Dairy Food Group Contributes to Nutrition Security and Health Equity

The Scientific Report reinforces the importance of dairy foods in eating patterns. The Committee made several conclusions that consuming dairy foods was associated with beneficial health outcomes. Among children, total milk and higher-fat milk versus lower-fat milk consumption was associated with beneficial impacts on growth, size and body composition and lower risk of obesity. Additionally, in older children and adolescents no association was found between sweetened milk consumption and growth, body composition or risk of obesity. For adults and older adults, high-fat dairy foods consumed as a part of healthy dietary patterns are associated with a lower risk of type 2 diabetes. Despite the strong body of evidence of a diversity of dairy foods associated with various positive health outcomes, the Committee continues to emphasize consumption of fat-free, low-fat and unsweetened dairy foods within dietary patterns across all life stages.

Dairy milk and the foods made from it, like yogurt and cheese, naturally provide a unique matrix of nutrients and bioactive components that contribute to health across the spectrum of fat levels. Emerging research indicates the unique dairy matrix may help explain the link between eating dairy foods, at a variety of fat levels, and neutral to beneficial health outcomes like reduced risk of cardiovascular disease and type 2 diabetes.[6,7] Cardiovascular disease disproportionately impacts people of color, making access to health-promoting foods more critical. Regardless of fat level, dairy foods such as milk, yogurt and cheese have demonstrated positive effects on cardiovascular health for people at various life stages, including children, adults and older adults, helping close nutrient gaps and reduce health disparities.[8]

Nutrient-dense dairy foods such as yogurt and flavored milk that contain sugar are shown to be beneficial to health. These foods contain naturally occurring sugars, and although they may contain limited added sugars, they also provide important nutrients needed for health. In particular, fermented dairy, such as yogurt offer functional benefits from its unique food matrix containing probiotics and other bioactive components despite presence of added sugars and fats. This was highlighted in the recent U.S. Food and Drug Administration's approval of a qualified health claim for the relationship between all types of yogurt and reduced risk of type 2 diabetes, independent of sugar or fat content.[9] Furthermore, research shows that offering flavored milk in school increases overall milk consumption among children and adolescents, helping to meet intake recommendations.[10] One recent large study of school-age children and adolescents found that those who drank flavored milk consumed one extra serving of their recommended daily dairy servings compared to non-flavored milk drinkers, which contributed to higher intakes of calcium; potassium; magnesium; phosphorus; and vitamins A, D, B12 and B2 (riboflavin).[11] Additionally, studies show that children who drink flavored milk tend to have lower intake of soft drinks and fruit juice and have higher intake of protein, calcium and essential amino acids as compared with non-consumers of milk.[12] The California dairy community has been proactive in reformulating flavored milk in schools over the years to significantly reduce added sugars in children's diets while still providing a nutrient-dense beverage that is enjoyable. Flavored milk offered in California schools has been reformulated to reduce added sugars to within 7 to 8 grams, per reports from California school milk processors. Overall, flavored milk contributes only 4% of total added sugars in children's diets[13] but provides 13 essential nutrients, including calcium, vitamin D and potassium that are underconsumed by most school-age children. These findings reinforce the nutritional contributions of flavored milk in children's eating patterns and the overall positive impact on diet

quality. Offering sweetened dairy alongside other dairy foods contributes to nutrition security by providing nutrient-rich choices that are accessible, affordable, easy to consume and appealing to children and adults alike.

Dairy Foods Are a Key Part of Federal Meal Programs

Dietary guidance that generally restricts or eliminates nutrient-dense foods, including within food groups, could have the potential to prevent the supply of critical nutrients to people in nutritionally vulnerable life stages, including pregnant and lactating women, young children and older adults, resulting in potentially significant public health consequences. The Dietary Guidelines for Americans serves as a foundation for federal nutrition assistance programs such as the National School Lunch Program, the School Breakfast Program, the Child and Adult Care Food Program, the Supplemental Nutrition Assistance Program and the Special Supplemental Nutrition Program for Women, Infants, and Children. These vital nutrition security safety net programs serve populations who benefit from the nutrition provided by nutrient-dense foods like milk and dairy foods, whole grains, fruits and vegetables. It is imperative to utilize the totality of evidence-based nutrition research, which continues to demonstrate the health-promoting benefits of a balanced eating approach that includes nutrient-dense choices and embraces the specific nutrient needs and preferences of individuals, diverse cultures and communities. Dairy foods are an accessible and widely available source of key nutrients, with affordable, convenient and culturally relevant options to meet the needs of all people. In a report, the Food and Agriculture Organization of the United Nations defined a key aspect of diet quality as consuming a variety and diversity within and across food groups.[14] While dietary guidelines outline nutrient requirements for individuals, there are a number of ways foods from different food groups can be combined to meet needs. Eating patterns should be tailored to individual taste preferences, budget, culture and regional availability.

Future Directions for the Dairy Food Group

The Dairy food group is currently defined by the Dietary Guidelines for Americans as including fat-free or low-fat milk, yogurt and cheese and/or lactose-free versions, and fortified soy beverages and yogurt as alternatives.[1] Dairy foods' nutrient profile delivered through the dairy matrix has a well-documented positive impact on diet quality and health. Milk and dairy foods and plant-based foods and beverages differ in nutrient content and bioavailability. Labeling all plant-based milk and yogurt alternatives other than fortified soy-based products as part of the Dairy food group does not reflect the nuance of milk's contribution to diet quality nor the varying nutrient content and bioavailability of plant-based alternatives that may prevent adequate intake or absorption and utilization of important nutrients.[15] Due to the variable nutrient content of plant-based dairy alternatives and the benefits of milk and dairy foods' unique nutrient package and important contribution to food-based dietary guidance, future considerations to redefine food group names should not include plant-based dairy alternatives beyond fortified soy-based products as a part of the Dairy food group. It is imperative to prioritize and support solutions for all life stages that enable consumption of nutritious foods such as milk and dairy foods, fresh fruit and vegetables, whole grains and high-quality animal and plant proteins.

Recommendations

Dairy Council of California makes the following statements to the USDA and HHS as they create the 2025–2030 Dietary Guidelines for Americans:

- Consider the health benefits of whole foods as the best way to support nutrition security of diverse communities in the United States. Solutions that restrict foods based on single nutrients such as added sugar or saturated fat without also focusing on impacts to overall diet quality could unintentionally limit access to and reduce consumption of nutritious foods.
- Milk and dairy foods are an important component of dietary patterns and federal meal programs, providing key nutrients that improve overall diet quality and contribute to nutrition security, which is critical for children and families living in underserved communities. Dietary guidance that is foundational to food security programs should emphasize the benefits of milk and dairy foods' unique nutrient package, matrix and important contribution to health across the life span. Future efforts to improve public health by redefining food groups should not include plant-based dairy alternatives as a part of the Dairy and Fortified Soy Alternatives food group.
- Providing flexibility and inclusion of nutrient-dense foods in and across food groups allows individuals to choose culturally relevant and appealing foods to increase consumption of already underconsumed food groups. This is particularly true of the Dairy food group; research shows that, regardless of fat content or small amounts of added sugar, dairy can be part of the solution to challenges like food and nutrition security, health equity and reducing risk of chronic diseases.
- It is critical for the Dietary Guidelines for Americans to continue to reinforce the important role dairy foods play in healthy eating patterns across the life span. Milk, yogurt and cheese provide essential nutrients—calcium, vitamin D, potassium and more—that support optimal growth and development in childhood and reduce disease risk through adulthood but are currently underconsumed. Most Americans across all life stages and socioeconomic groups, especially populations at risk for nutrition-related health disparities, could benefit from meeting the daily dairy recommendations.

We appreciate the opportunity to submit these comments.

Sincerely,

Amy DeLisio, MPH, RDN
Chief Executive Officer

Ashley Rosales, RDN
Nutrition and Industry Affairs Officer

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