



May 5, 2015

Federal Register
Docket No. 2015-03552
Health and Human Services Department
Agriculture Department

Re: Comments on Docket No. 2015-03552; *Announcement of the Availability of the Scientific Report of the 2015 Dietary Guidelines Advisory Committee, Solicitation of Written Comments on the Advisory Report, and Invitation for Oral Testimony at a Public Meeting*

To Whom It May Concern:

The United States Cattlemen's Association (USCA) represents a national membership of cow-calf producers, backgrounders and feedlot operators. Thank you for the opportunity to comment on the Federal Register Notice: Docket No. 2015-03552, *Announcement of the Availability of the Scientific Report of the 2015 Dietary Guidelines Advisory Committee, Solicitation of Written Comments on the Advisory Report, and Invitation for Oral Testimony at a Public Meeting*, as originally posted on February 23, 2015.

After review of the stated report, USCA offers the following comments to Secretary of Agriculture Tom Vilsack and Secretary of Health and Human Services Sylvia Burwell regarding the 2015 Dietary Guidelines Advisory Committee's Scientific Report:

Sustainability and Environment

USCA urges Secretaries Vilsack and Burwell to disavow and strike from inclusion in the final Dietary Guidelines any recommendations contained in the Advisory Report that address the alleged environmental impacts of red meat production. Chapter 5 of the report, Food Sustainability and Safety, greatly exceeds the bounds of the report and its guidance as directed by Congress. The chapter's introduction states, "An important reason for addressing sustainable diets, a new area for the DGAC, is to have alignment and consistency in dietary guidance that promotes both health and sustainability. This also recognizes the significant impact of food and beverages on environmental outcomes, from farm to plate to waste disposal, and, therefore, the need for dietary guidance to include the wider issue of sustainability." This statement clearly outlines the resulting tone and message of the chapter, which rather than including or referencing proven fact, simply relies on proposed public perception and ideals as basis for the recommendation.

The chapter clearly acknowledges one of the main discrepancies USCA has with this section's inclusion, "It should be noted that research in the area of dietary patterns and sustainability is rapidly evolving and the methodologies for determining dietary patterns in populations and Life Cycle Analysis of foods/food components and environmental outcomes have made significant advances in recent years." The Advisory Committee

recognizes that research and proven fact based on the term, “sustainability”, is a fluid and still new process to researchers across the globe. The reliance, and revision, of terms put forth by the Food and Agriculture Organization (FAO) to describe the relevance of this issue within the report should not be accepted by the USDA and HHS in their ultimate adoption and revision of the report.

The 2015 Dietary Guidelines Advisory Committee members were selected for their expertise on nutrition. The Committee members were not, nor were they directed by the original Congressional mandate, to include any individuals experienced or deemed an “expert” in the environment-based field of study.

Despite this fact, the advisory report includes an entire chapter devoted to specific food groups and their suggested environmental impact. Therefore, the recommendations included within the section environmental impacts exceed the expertise of the committee. The current state of knowledge about the environment does not support such extreme recommendations.

Current Science

The report’s recommendations are adverse to known nutritional science and contains multiple inconsistencies. The report fails to consider, or take into account, the many essential nutrients derived from animal sources. Current research and science all points toward the multiple benefits gained through such animal proteins as lean beef. Rather than consider animal-based proteins, the report instead negates the inclusion of any statements that support the inclusion of animal proteins in a healthy diet. The Advisory Report, by discouraging the consumption of red meat and other animal-sourced protein, places the cognitive health and brain development of the United States population at unnecessary risk. Iron, zinc and B vitamins are all necessary for healthy cognitive development. Lean cuts of red meat remain one of the best protein-sources of such needed nutrients, however the report fails to include any mention of this positive attribute. The report specifically states its goal as, “the Dietary Guidelines for Americans should provide food-based guidance for obtaining the nutrients needed for optimal reproductive health, growth and development, healthy aging, and well-being across the lifespan (ages 2 years and older).” The failure to include lean meat as a component of a robust and healthy diet directly contradicts this message.

A brief acknowledgement of the essential value of animal sourced protein is contained in the executive report and states, “As lean meats were not consistently defined or handled similarly between studies, they were not identified as a common characteristic across the review. However, as demonstrated in the food pattern modeling of the Healthy-U.S.-style and Healthy Mediterranean-style patterns, lean meats can be a part of a healthy dietary pattern.” The statement directly acknowledges lean meats’ role in a healthy diet, however, no other consideration is given throughout the report to such benefits. This omission is unacceptable for a document which has been drafted to review and evaluate all aspects of a healthy diet, not just a diet preferred over another.

The report further contradicts itself when referencing the use of supplements in a healthy diet. The report states that a healthy diet should not rely on supplements in place of other nutrient-dense foods. However, the report then recommends that supplements may be used in a vegetarian diet to replace nutrients not gained solely through plant-based options.

USCA requests that both Secretary Vilsack and Burwell take into account the above comments when considering final dietary guidelines. USCA is committed to only supporting guidelines based on current science and fact and oppose any attempt to incorporate personal ideals and philosophies into a national guiding document. USCA looks forward to working with both USDA and HHS as this process moves forward.

Please don't hesitate to contact us if you require additional information or wish to discuss this issue further. You may reach USCA's Washington, D.C. office at 202-546-4064.

Regards,

A handwritten signature in cursive script that reads "Danni Beer". The letters are fluid and connected, with a prominent loop on the 'D' and a long, sweeping tail on the 'B'.

Danni Beer

President

United States Cattlemen's Association