

Agri-Mark, Inc.

Associated Milk
Producers Inc.

Bongards' Creameries

California Dairies, Inc.

Cayuga Marketing

Cooperative Milk
Producers Association

Dairy Farmers
of America, Inc.

Ellsworth
Cooperative Creamery

FarmFirst Dairy
Cooperative

First District Association

Foremost Farms USA

Land O'Lakes, Inc.

Lone Star Milk Producers

Maryland & Virginia Milk
Producers Cooperative
Association

Michigan Milk
Producers Association

Mount Joy Farmers
Cooperative Association

Northwest Dairy
Association

Oneida-Madison Milk
Producers Cooperative
Association

Prairie Farms Dairy, Inc.

Scioto Cooperative Milk
Producers' Association

Southeast Milk, Inc.

Tillamook County
Creamery Association

United Dairywomen
of Arizona

Upstate Niagara
Cooperative, Inc.

February 10, 2025

Janet M. de Jesus, MS, RD
HHS/OASH Office of Disease Prevention and
Health Promotion (ODPHP)
1101 Wootton Parkway, Suite 420
Rockville, MD 20852

Submitted via regulations.gov

RE: Docket HHS-OASH-2024-0017

Dear Ms. de Jesus:

These comments on the *Scientific Report of the 2025 Dietary Guidelines Advisory Committee (DGAC)* are submitted to USDA and HHS for consideration on behalf of the National Milk Producers Federation (NMPF). NMPF, established in 1916 and based in Arlington, VA, develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce two-thirds of the U.S. milk supply, making NMPF the voice of dairy producers on Capitol Hill and with government agencies.

NMPF is pleased that the scientific report reaffirms the critical role of dairy foods in a nutritious diet.

1. **The report continues to recommend three servings of dairy a day for Americans 2 years and older**, emphasizing the valuable nutrition package dairy offers. Three servings of dairy provide Americans with essential nutrients for all stages of life. As stated in the report, *“although the emphasis has been on calcium and vitamin D, a combination of multiple nutrients (energy, protein, calcium, phosphorous, magnesium, zinc, and vitamin A) is critical for children’s bone health. Reducing or removing the Dairy and Fortified Soy Alternatives Food Group reduces levels of certain nutrients, which would need to be accounted for by proposed substitutions/synthesis.” (Part D, Chapter 10, pg. 39)*
2. **The report does not recommend any additional plant-based alternatives beyond fortified soy**, stating that *“the direct*

substitution of plant-based milk alternatives for cow's milk within the patterns may introduce unintended consequences for meeting other nutrient recommendations and may vary by product selected. This is especially a concern in children where nutrients such as protein, phosphorus, and magnesium are critical for bone mineral development.” (Part D, Chapter 10, pg. 10)

3. **The report recommends lactose-free dairy products for those that are lactose intolerant.** The Committee appropriately recognized that to call lactose-free dairy an “alternative” is inexact and even misleading, because lactose-free milk is milk. All 13 essential nutrients are still there. The idea of adapting the nomenclature for the dairy group to make clear that lactose-free options are integral to the group’s components is a good one. However, given the Committee’s (appropriate) decision not to expand the group to include plant-based alternatives beyond fortified soy, re-naming the dairy group needs to be approached with extreme caution. It would be misleading, for example, to use any word other than “soy” – such as “plant-based” or “alternatives” – to describe the non-dairy component of the group. Soy is soy, not almond or oat.
4. **Dairy continues to be under-consumed but is a top of source of three of the four nutrients of public health concern- calcium, potassium and vitamin D.**

Full-Fat Dairy Should be Recommended in the Final Guidelines

NMPF strongly urges USDA and HHS to review the scientific literature on dairy foods at all fat levels and draw their own conclusions. Many of the most recent studies on dairy fats were not included in the Committee’s review because of inclusion criteria that resulted in ignoring some of the most comprehensive science on this topic. Despite these omissions, the Committee still found that **substituting higher-fat dairy for lower-fat dairy by adults and older adults is not associated with a difference in risk of cardiovascular disease morbidity.** In addition, the Committee found that **consumption of higher-fat dairy milk compared to lower-fat dairy milk by younger children may be associated with favorable growth and body composition, and lower risk of obesity during childhood.** (Part D, Chapter 3, pg. 5)

Given the realities of the DGA process, we believe the departments should **include language in the DGAs that explains that Americans can consume whole and reduced-fat dairy in the context of a healthy dietary pattern as long as their total saturated fat intake remains at or below 10 percent of calories.** A recently published food pattern modeling exercise has shown that this can be done (1).

Earlier editions of the DGA advised Americans to limit total fat consumption. The reductionist “fat is bad” message arguably had unintended consequences, implying that all fat is the same and perhaps encouraging excessive consumption of refined carbohydrates. Eventually, a more sophisticated approach differentiated among saturated, monounsaturated and polyunsaturated fats, and advised limits on saturated fat (SF) as a percentage of calories. Similarly, previous DGA editions advised strict limits on dietary cholesterol, but cholesterol is no longer listed as a nutrient of concern for over-consumption and recent DGAs have not included numerical cholesterol intake goals.

Thus, guidance has changed over time for both total fat and cholesterol: The 2020-2025 DGA contains no quantitative recommendations for either. This fact should inspire some humility and a recognition that fats are not simple. Indeed, there are several hundred different fatty acids in milk (2). Noting the evolution of nutrition guidance from a single-nutrient approach to one more focused on whole foods and even more on dietary patterns, research has shown:

- “[T]otal dairy consumption, regardless of fat level, is linked to neutral or lower [cardiovascular disease] (CVD) risk in children and adults”
- Similarly, “high-quality clinical trials support a beneficial or neutral relationship between whole milk dairy foods and cardiometabolic health.”
- Dairy’s “food matrix, defined as the nutrient and non-nutrient components of foods and their molecular relationships (chemical bonds) to each other ... may help explain why SF from whole- and reduced-fat dairy foods does not have the same physiological effects as non-dairy sources of SF” (3)

Dairy’s contributions to avoiding chronic disease are increasingly recognized, including by the federal government. Recently, the FDA permitted qualified health claims “regarding the consumption of yogurt and reduced risk of type 2 diabetes.” In authorizing the claims, the FDA stated that the association between yogurt consumption and lower T2D risk “was based on yogurt as a food, rather than any single nutrient or compound in yogurt, *regardless of fat or sugar content*” (4). In short, the evidence is clear that dairy foods are healthy at all fat levels, and the advice to limit consumption to low-fat and fat-free varieties is unnecessary.

Flavored Milk is Essential for Children to Consume Key Nutrients

In reviewing the science on flavored milk and obesity, the report states *“there may not be a relationship between consumption of sweetened milk by older children and adolescents and growth, body composition, and risk of obesity”* (Part D, Chapter 3, pg. 5) but the Committee argued that the evidence was insufficient to advise changing the 2020-2025 DGAs recommendation of consuming unsweetened fat-free and low-fat milk across the lifespan. While NMPF agrees that milk is an essential piece to all diets, we would argue that flavored milk should also be recommended as a healthy option in the final DGAs. Flavored milk in schools is an excellent case study to demonstrate the effect that small amounts of added sugar can have to increase palatability and consumption of a healthy and nutritious product.

All real milk, flavored or unflavored, is a source of 13 essential nutrients and the top source of calcium, potassium, and vitamin D for children ages 2-18 (5,6). Flavored milk is associated with beneficial nutrient intakes and weight outcomes. Adolescents who drink flavored milk are five times as likely to maintain above-median intakes of dairy foods (7). Chocolate milk is associated with protection against childhood overweight and obesity (8), and flavored milk drinkers have higher consumption of calcium, potassium, magnesium, phosphorus and vitamins A, D, B12 and riboflavin, compared to those who do not consume flavored milk (9).

Dairy processors have voluntarily worked for more than a decade to reduce added sugars in flavored milk, and the flavored milk currently offered in schools has lower levels of calories and added sugars than ever before (10). The average amount of added sugars in school flavored milk has been reduced by 50 percent, to only 8.2 grams, with school flavored milk now having, on average, only 29 calories more than unflavored milk (11). Most flavored milk in schools now meets or beats the sugar limit recommended by the National Academies of Science, Engineering, and Medicine (formerly the Institute of Medicine) (12). In fact, 37 milk processors supported the Healthy School Milk Commitment, which commits to providing school milk options with no more than 10 grams of added sugar per 8-fluid ounce serving by the 2025-2026 school year and thereafter.

As stated in the Scientific Report, *“by allowing for flexibility in food choices, such as incorporating preferred foods in moderation, dietary recommendations can be more effective in promoting long-term behavior change.”* (Part B, Chapter 1, pg. 3)

Dairy is an affordable source of nutrients of public health concern for everyone

Milk and dairy products have been found to be an economically favorable option and can help Americans reach nutrient goals without breaking the bank. One study found that milk and dairy were inexpensive sources of calcium, potassium and vitamin D, three of the four nutrients of public health concern. More specifically, milk and cheese were the least expensive sources of calcium, and milk was the least expensive source of vitamin D (13).

Another study found that if Americans consumed three servings of dairy foods a day, this could result in an estimated \$12.5 billion in healthcare cost savings from a reduction in stroke, type II diabetes, hypertension, and colorectal cancer (14). This same study concluded that “adoption of a dietary pattern with increased dairy consumption among adults in the US to meet DGA recommendations has the potential to provide billions of dollars in savings,” pointing not only to dairy’s affordability but also the money that could be saved if the recommended servings of dairy were being consumed (14).

We urge USDA and HHS to follow the committee’s recommendations, continuing to recommend three servings of dairy a day, and recognizing dairy’s place in a healthy diet.

NMPF appreciates the opportunity to provide these comments and is happy to discuss any of these points further with USDA and HHS if the departments are interested in doing so.

Sincerely,



Miquela L. Hanselman, MPH
Director, Regulatory Affairs

Resources

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