



Reflections on the 2015-2020 Dietary Guidelines Process and Recommendations on Developing Future Editions of *Dietary Guidelines for Americans*

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Good morning. My name is Rebecca Klein. I'm here on behalf of Friends of the Earth, a non-profit organization with over 650,000 supporters that fights for a healthier, more just and sustainable world. Thank you, Ms. Tagtow and USDA for the opportunity to offer our perspective today.

Before I speak to ways for improving the process in the future, we want to highlight what has been working well. We believe that the overall process for gathering and synthesizing scientific evidence to inform the 2015-2020 Dietary Guidelines was nearly flawless. The methods used by the Dietary Guidelines Advisory Committee (Advisory Committee) to review the scientific evidence were rigorous and fully appropriate to the task at hand.

We commend USDA and HHS for encouraging a transparent process of scientific inquiry, including six publicly televised committee hearings. The Advisory Committee's conclusions accurately reflected the preponderance of the scientific evidence, particularly in regard to the need for Americans to consume less meat and more plant-based foods for their health and America's long-term food security.

We therefore urge only a few changes with regard to the role of the Advisory Committee and its transparent process for reviewing, evaluating and deliberating on the latest scientific findings with respect to healthy diets for Americans (described further below). What does needs to change, however, is interference by Congress and the food industry that prevented USDA and HHS from publishing dietary guidance that fully and clearly reflected the science and the unanimous recommendations of the Advisory Committee.

More transparency is needed for the public to understand why key consensus recommendations from a highly esteemed scientific body were ignored in the final Dietary Guidelines, particularly when key science-based recommendations were supported by more than 21,000 public comments, 200,000 public petitions, 700 health professionals and hundreds of mayors.

As you know, more than 29,000 total public comments were submitted (fourteen times the number of comments submitted in 2010), which represents an unprecedented level of civic engagement. According to two independent analyses, more than two thirds of these were in support of the scientific findings of the Advisory Committee around the need to reduce meat consumption and to

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include sustainability recommendations.¹ The same support was echoed in the nearly 200,000 petition signatures delivered to USDA and HHS.

While such public opinion should not drive the contents of the Dietary Guidelines, it should have bolstered USDA and HHS's resolve to publish dietary guidance that fully aligned with the evidenced-based conclusions of the Advisory Committee. Unfortunately, the only conclusion that one can draw from this failure to incorporate the overwhelming science is that Congress and profit-driven food industry interests interfered in a way that prevented the final guidelines from fully reflecting the scientific evidence.

Experts from leading public health organizations, including the World Health Organization, the American Heart Association and American Cancer Society echo hundreds of scientific studies that confirm that people need to eat less meat, particularly red and processed meat, for better health. Yet, the only recommendation to reduce meat consumption was buried deep in the final report and only applied to teenage boys and men, with no specific recommendation on eating less red and processed meat. In fact, the report makes no distinction between what kind of meat to eat, merely stating that a recommended maximum weekly intake of 26 ounces of meat, poultry and eggs — or 3.7 ounces per day for a 2000 calorie diet — is ideal.

As my colleague, Kari Hamerschlag, Friends of the Earth's senior program manager, stated in response to the final guidelines : "Despite clear evidence that high red meat consumption is linked to cancer and threatens future food security because of its huge resource demands, the 2015 Guidelines failed to make a specific portion size recommendation for red meat."

According to USDA ERS data, the average American is consuming 6 ounces of meat per day², 40 percent above the recommended amounts in the 2015 Guidelines. By failing to include an upfront recommendation on the need for Americans to consume less meat overall, the 2015-2020 Dietary Guidelines for Americans, which are supposed to help *clarify* what people should eat, are actually obscuring science-based recommendations that Americans should significantly cut their meat intake for health, food security and environmental reasons.

For the sake of Americans' health and our country's future ability to produce nutritious food aspects of this process must change. These are our recommendations.

First, we offer a few suggestions regarding the Advisory Committee. The 2015 Advisory Committee was comprised of experts with integrity and with utmost regard for the scientific process. The future selection process for the Advisory Committee should similarly ensure the appointments of independent academics and experts who have no conflicts of interest with the food industry (e.g. without research and other activities supported by food industry funds, nor holding positions on food industry company's advisory boards, etc.).

In addition, we would recommend the continued inclusion of committee members who have expertise in food production sustainability as it relates to long-term nutritional sufficiency, as well as human

¹ See My Plate My Planet, The Dietary Guidelines Advisory Committee Report: Support for Sustainability in the Public Comments available at: http://www.myplatemyplanet.org/downloads/2_Comments%20Analysis_Final.pdf and FoodMinds, The Public Weighs In On Seminal Nutrition Science Report available at: <http://www.foodminds.com/index.php/news/the-public-weighs-in-on-seminal-nutrition-science-report>

² Friends of the Earth analysis of USDA Economic Research Food Availability Data available at: [http://www.ers.usda.gov/data-products/food-availability-\(per-capita\)-data-system.aspx](http://www.ers.usda.gov/data-products/food-availability-(per-capita)-data-system.aspx)

and environmental health. It is impossible to discuss the kinds of foods that Americans should be eating without taking into account the impacts of food production on public health and future food security.

It is unfortunate that Secretaries Burwell and Vilsack ignored the weight of the evidence and decided that consideration of sustainability issues was outside the scope of the Dietary Guidelines. Other analyses, particularly the one authored by USDA Deputy Secretary Kathleen Merrigan and colleagues in the peer-reviewed journal *Science*, clearly show that it is entirely appropriate and necessary to include dietary guidance on food production methods and their impact on future food security and sufficiency.

Current industrial agriculture practices, especially those for producing animal proteins, significantly contribute to climate change and use massive amounts of limited resources like fresh water.

On March 19, 2015 President Obama signed [Executive Order \(EO\) 13693](#). One goal of this EO is to cut federal GHG emissions 40 percent over the next decade from 2008 levels. Reducing the amount and changing the type of meat served across our nation could significantly reduce GHG emissions beyond the steps outlined in the EO. In fact, a 2015 UN Intergovernmental Panel on Climate Change (IPCC) report identified the vital role that reduced meat consumption can play in mitigating climate change and addressing other environmental issues, pointing out that, “changes in human diet can have a significant impact on GHG emissions.” One of the most important findings in the IPCC report is that “the potential to reduce GHG emissions through changes in consumption (that include some meat, fish and eggs) was found to be substantially higher than that of technical mitigation measures.”³

Preserving water is just as vital as mitigating climate change. The science is clear that plant-based proteins require far fewer resources per unit of protein than animal proteins.^{4,5,6} *For example, it takes 4-6 times as much water to produce a gram of beef protein as it does to produce a gram of lentil protein.*⁷ This is not just an environmental issue. This is a clear food security and nutrition issue. We must have enough water to produce food.

In conclusion, what clearly needs to change is congressional and industry interference with the Agencies’ ability to produce a document that reflects the careful, objective, evidence-based work of the Advisory Committee and the preponderance of global scientific evidence. We hope the IOM will confirm the soundness of the current Dietary Guidelines Advisory Committee process, and focus much of its review on how to enhance the ability of USDA and HHS to publish Dietary Guidelines that fully and clearly reflect the weight of the scientific evidence, not politics or profit-driven food industry interests.

³ Intergovernmental Panel on Climate Change, Climate Change 2014: Mitigation of Climate Change, Chapter 11, available at: https://www.ipcc.ch/pdf/assessment-report/ar5/wg3/ipcc_wg3_ar5_full.pdf

⁴ Ripple, W., Smith, P., Haberl, H., Montzka, S., Mcalpine, C., & Boucher, D. (2013). Ruminants, climate change and climate policy. *Nature Climate Change*, 2-5. Retrieved May 9, 2015.

⁵ Nijdam, D., Rood, T., & Westhoek, H. (2012). The price of protein: Review of land use and carbon footprints from life cycle assessments of animal food products and their substitutes. *Food Policy*, 37, 760-770. Retrieved May 9, 2015.

⁶ Mekonnen, M., & Hoekstra, A. (2012). A Global Assessment of the Water Footprint of Farm Animal Products. *Ecosystems*, 15, 401-415. doi:10.1007/s10021-011-9517-8

⁷ Mekonnen MM, Hoekstra AY. (2010). The green, blue, and grey water footprint of Farm Animals and Animal Products, Volume 1, Main Report, UNESCO-IHE, Institute for Water Education

Thank you for your time, and again, thank you for the opportunity to share our perspective on this important process.