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**RE: Comments to Dietary Guidelines Advisory Committee  
Regarding the Removal of Lean Meat as a Component of a Dietary Pattern  
Associated with Positive Health Outcomes; and Recommendation that a  
Pattern Lower in Animal-Based Foods is More Health Promoting and is  
Associated with Lesser Environmental Impact**

Dear Dr. Olson and Ms. Tagtow:

The North American Meat Institute (NAMI or the Institute) is the leading voice for the meat and poultry industry. Formed from the merger of the American Meat Institute (AMI) and North American Meat Association (NAMA), the Institute has a rich, century-long history and provides essential member services including legislative, regulatory, scientific, international, and public affairs representation. NAMI's mission is to shape a public policy environment in which the meat and poultry industry can produce wholesome products safely, efficiently and profitably. Together, the Institute's members produce the vast majority of U.S. beef, pork, lamb, and poultry and the equipment, ingredients and services needed for the safest and highest quality products.

The removal of lean meat as a component of a healthy eating pattern will be detrimental to the health of the American population. Meat and poultry products play an important role in a healthy, well-balanced diet. Including meat and poultry in the diet allows consumers to more easily fulfill their essential amino acid and nutrient requirements.

The objectives of the Dietary Guidelines Advisory Committee (DGAC) are best achieved by encouraging consumption of nutrient dense foods, such as fresh and processed meat and poultry, as part of a healthy, balanced diet. Consumers will be best served when provided guidance about portion control and selecting or preparing foods in healthier ways. Delineating which food production systems are “healthier” as part of a process that should be focused on nutrition will distract and frustrate consumers and is beyond the Committee’s charge to provide scientific nutrition expertise. Because meat and poultry can play an important role in a healthy, well-balanced diet NAMI respectfully requests careful consideration of the following comments.

**Removal of Lean Meat as a Component of a Dietary Pattern Associated with Positive Health Outcomes by the Dietary Guidelines Advisory Committee was Arbitrary and Capricious**

During the past year, the DGAC Subcommittee 2 has examined the common characteristics of dietary patterns associated with positive health incomes. Throughout the DGAC deliberations, in addition to being recognized as nutrient-dense in the *Dietary Guidelines for Americans, 2010*, lean meat was considered a component of a dietary pattern associated with positive health outcomes. Somehow, during an 80-minute lunch meeting on December 15 closed to the public, Subcommittee 2 removed “lean meat” from the recommended dietary pattern the U.S. population should consume. This omission suggests the DGAC fails to recognize the nutritional value lean meat offers and is ignoring the scientific evidence supporting its inclusion in the American diet.

NAMI representatives initially expressed concern about the lateness of the discussion regarding “lean meat” in a November 10 meeting with Angie Tagtow and her staff. During the November 7 DGAC meeting, it became obvious there was not consensus among Committee members concerning the term “lean meat” and whether it can include “lean red meat.” In that regard, NAMI representatives expressed concern about the apparent confusion and cautioned Ms. Tagtow and staff that the role of “lean meat” needed to be considered judiciously during the development of final nutritional policy. When the draft evidence conclusions initially were reported at the beginning of the December 15 meeting, it appeared that the Committee had resolved its concerns during the month since its last public meeting. Those concerns were resurrected, however, as the December 15 DGAC meeting unfolded.

Based on the December 15 meeting, NAMI questions the scientific rigor of the DGAC decision, especially after nearly 24 months of reviewing the scientific evidence. If the DGAC believed lean meat was not part of common characteristics of a healthy pattern, why was it included in the draft evidence conclusion through the morning of December 15? NAMI representatives watched the DGAC deliberate the term “lean meat” during its December 15 meeting and were shocked by the confusion and lack of consensus about several critical issues: what is “lean;” what does “meat” mean; does “lean meat” include red meat; does “lean meat” include poultry; can “lean meat” include processed meat; and what does the DGAC mean by “lower” or “higher?” These questions were raised during a 90-minute discussion in the December 15 meeting -- a meeting where the final recommendations were to be made and not a forum to encourage a debate that led to a 12<sup>th</sup>-hour private meeting among subcommittee members to make the final recommendation. This extremely last minute change in turn allowed fewer than 15 days for the public to respond to this new recommendation before the DGAC comment period closes on December 30. Furthermore, it is unclear whether any comments submitted during this 15-day timeframe, including these comments, will be considered by DGAC because the draft report was voted final at the end of the December 15 meeting. This dilemma poses an obvious question -- who will review the comments submitted between December 15 – 30; the DGAC or the agencies?

The “stroke of midnight” behind closed-door discussions also limited the public’s ability to provide meaningful insights or perspectives to the discussion before the final recommendations are submitted to the agencies. The questions being debated and finalized by the DGAC should have been considered earlier, more thoroughly, and more transparently -- not during a closed-door lunch hour break. The Committee’s “about face” concerning the lean meat issue calls into question whether scientific evidence has been adequately considered and whether the DGAC recommendations will be based more on opinions and impressions than scientific evidence.

Instead, the Committee’s actions suggest that, given an inability to achieve consensus, it chose to delete “lean meat” from its recommendations of components of a healthy eating pattern. Ironically, the Committee decision-making could have been much easier had it simply used the regulatory definition of “lean.” According to USDA’s Food Safety and Inspection Service “lean” is defined as 100 grams of individual food with less than 10 grams of fat, 4.5 grams or less of saturated fat, and less than 95 milligrams of cholesterol. <sup>1</sup> This “lean” definition would include all meat and poultry products, including red and processed meats.

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<sup>1</sup> USDA-FSIS-OPPED-LCPS. 2007. A guide to federal food labeling requirements for meat, poultry, and egg products. [http://www.fsis.usda.gov/shared/PDF/Labeling\\_Requirements\\_Guide.pdf](http://www.fsis.usda.gov/shared/PDF/Labeling_Requirements_Guide.pdf).

Instead, by removing “lean meat” from the recommended healthy eating pattern, the DGAC ignored the following facts.

- *Dietary Guidelines for Americans, 2010* recommended consuming nutrient-dense foods and beverages, which included lean meats and poultry. The *Dietary Guidelines for Americans, 2010* also recommended that women capable of becoming pregnant should consume foods that supply heme iron, *i.e.* meat and poultry.<sup>2</sup>
- Subcommittee 1 data from the DGAC November 7 meeting demonstrated strong and consistent evidence from a majority of randomized control trials (RCT) that red and processed meats consumption are part of healthy dietary patterns. Further, all trials indicated that “gold standard” Mediterranean-style diets reported red and processed meat consumption at or above the usual adult consumption range, which is higher than USDA Food Patterns (median consumption up to twice the USDA Food Patterns).<sup>3</sup>
- High quality evidence from at least 12 RCT supports lean red meat as a beneficial component in a healthy dietary pattern.<sup>4,5,6,7,8,9,10,11</sup>
- Meat and poultry consumed in combination with vegetables helps the body absorb more nutrients from vegetables.<sup>12,13</sup>
- Lean pork and other lean meats contribute to weight management and healthy eating patterns.<sup>14,15,16,17,18,19,20</sup>

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<sup>2</sup> *Dietary Guidelines for Americans, 2010.*

<sup>3</sup> Data presented at November 7 Meeting of DGAC.

<sup>4</sup> Clara Lau. Comment #874. Submitted December 11, 2014.

<sup>5</sup> Clara Lau. Comment #638. Submitted August 27, 2014.

<sup>6</sup> Clara Lau. Comment #638. Submitted July 23, 2014.

<sup>7</sup> Shalene McNeill. Comment #566. Submitted July 11, 2014.

<sup>8</sup> Clara Lau. Comment #416. Submitted March 14, 2014.

<sup>9</sup> Clara Lau. Comment #402. Submitted March 10, 2014.

<sup>10</sup> Clara Lau. Comment #395. Submitted March 5, 2014.

<sup>11</sup> Shalene McNeill. Comment #113. Submitted September 23, 2013.

<sup>12</sup> Lim KH, *et al* (2013). Iron and zinc nutrition in the economically-developed world: a review. <http://www.mdpi.com/2072-6643/5/8/3184>.

<sup>13</sup> Foster, M, *et al.* (2013). Effect of vegetarian diets on zinc status: A systematic review and meta-analysis of studies in humans. *J. Sci. Food Agric.* 93:2362–71.

<sup>14</sup> Leidy HJ, Tang M, Armstrong CLH, Martin CB, Campbell WW. The effects of consuming frequent, higher protein meals on appetite and satiety during weight loss in overweight/obese men. *Obesity.* 2011; 19: 818-824.

<sup>15</sup> Leidy HJ, Bossingham MJ, Mattes RD, Campbell WW. Increased dietary protein consumed at breakfast leads to an initial and sustained feeling of fullness during energy restriction compared to other meal times. *British Journal of Nutrition.* 2009; 101: 798-803.

<sup>16</sup> Leidy H, Hoertel H, Douglas S, Shafer R. Daily addition of a protein-rich breakfast for long-term improvements in energy intake regulation and body weight management in overweight & obese ‘Breakfast Skipping’ young people. *Experimental Biology*; April 2013.

<sup>17</sup> Leidy HJ, Carnell NS, Mattes RD, Campbell WW. Higher protein intake preserves lean mass and satiety with weight loss in pre-obese and obese women. *Obesity.* 2007; 15: 421-429.

<sup>18</sup> Buyck JF, Blacher J, Kesse-Guyot E, Castetbon K, Galan P, Safar M, Herberg S, Czernichow S. Differential associations of dietary sodium and potassium intake with blood pressure: a focus on pulse pressure. *Journal of Hypertension.* 2009; 27: 1158-1164.

<sup>19</sup> Murphy MM, Spungen JH, Bi X, Barraj LM. Fresh and fresh lean pork are substantial sources of key nutrients when these products are consumed by adults in the United States. *Nutrition Research.* 2011; 31: 776-783.

<sup>20</sup> Leidy HJ, Carnell NS, Mattes RD, Campbell WW. Higher protein intake preserves lean mass and satiety with weight loss in pre-obese and obese women. *Obesity.* 2007; 15: 421-429.

- Americans are consuming protein foods within ranges recommended in *Dietary Guidelines for Americans, 2010*.<sup>21</sup>
- What We Eat In America NHANES 2007-2010 reported more than 60 percent of the U.S. population is consuming protein foods at or below recommended intake levels, which is not significantly different from intake levels reported during 2001-2004.<sup>22</sup>
- U.S. population has a Healthy Eating Index of an average of 100 percent for Total Protein Foods.<sup>23</sup>
- On average, a three-ounce serving of lean beef is about 150 calories and an excellent source of six nutrients (protein, zinc, vitamin B12, vitamin B6, niacin, and selenium) and a good source of four nutrients (phosphorous, choline, iron and riboflavin).<sup>24</sup>
- More than 65 percent of beef cuts sold at retail meet government standards for lean, including 17 of 25 most popular cuts.<sup>25</sup>
- U.S. dietary survey data shows that fresh beef is the number one source of protein, vitamin B12 and zinc in the American diet.<sup>26</sup>
- Turkey is a low-fat, high-protein option to help Americans meet lean meat recommendations as one 3.5 ounce (100 gram) serving of boneless, skinless turkey breast contains about 25 grams of protein, less than one gram of fat and zero grams of saturated fat.<sup>27</sup>
- Turkey is a source of niacin, vitamin B6, and phosphorus and a good source of B5, zinc as well as of iron and potassium.<sup>28</sup>
- Pork is a lean, nutrient-rich food and a three-ounce serving of pork tenderloin is a source of nine key nutrients – an “excellent” source of thiamin, selenium, protein, niacin, vitamin B6 and phosphorus and a “good” source of riboflavin, zinc and potassium.<sup>29</sup> Compared to 20 years ago, pork is also 16 percent leaner and 27 percent lower in saturated fat.<sup>30</sup>
- Among pork consumers, fresh lean pork accounts for 23 percent of total protein intake; 25 percent or more of total intakes of selenium and thiamin; 10 percent or more of total intakes of phosphorus, potassium, zinc and B vitamins (riboflavin, niacin, vitamins B6 and B12).<sup>31</sup>
- Seven cuts of pork meet the USDA guidelines for “lean”.<sup>32</sup>
- Grilled, skinless, boneless chicken breast (3.5 ounces) has 30 grams of protein, 3 grams of fat of which less than 1 gram is saturated fat.<sup>33</sup>

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<sup>21</sup> *Dietary Guidelines for Americans, 2010*.

<sup>22</sup> <http://www.health.gov/dietaryguidelines/2015-binder/meeting4/docs/subcommittees/SC1.pdf>

<sup>23</sup> Average HEI-2010 scores for Americans by age group, 2009-10. Reported at DGAC November 7 meeting.

<sup>24</sup> U.S. Department of Agriculture, Agricultural Research Service. 2010. USDA National Nutrient Database for Standard Reference, Release 23. Nutrient Data Laboratory Home Page.

<sup>25</sup> Russell Cross. Comment #571. Submitted July 14, 2014.

<sup>26</sup> Cotton AP, *et al.* Dietary sources of nutrients among US adults, 1994 to 1996. *J Am Diet Assoc.* 2004; 104(6):921-30.

<sup>27</sup> USDA Nutrient Database. “Turkey, fryer-roasters, breast, meat only, raw.” Available at <http://ndb.nal.usda.gov/>.

<sup>28</sup> USDA Nutrient Database. “Turkey, fryer-roasters, breast, meat only, raw.” Available at <http://ndb.nal.usda.gov/>.

<sup>29</sup> National Nutrient Database for Standard Reference, Release 23. Based on 3-ounce cooked servings (roasted), separable lean only.

<sup>30</sup> National Nutrient Database for Standard Reference, Release 26.

<sup>31</sup> Murphy MM, Spungen JH, Bi X, Barraj LM. Fresh and fresh lean pork are substantial sources of key nutrients when these products are consumed by adults in the United States. *Nutrition Research.* 2011; 31: 776-783.

<sup>32</sup> National Nutrient Database for Standard Reference, Release 26.

- Menu model analysis using the *Dietary Guidelines for Americans, 2010* requirements for macro- and micro- nutrients and food groups based on a 2,000-calorie daily diet demonstrated that processed meats can and do fit in a healthy eating pattern. Processed meats, even consumed twice daily for a week, allow consumers to stay within daily calorie goals, and daily goals for nutrients to limit while meeting or exceeding needs for nutrients to encourage. The model also demonstrates that processed meats fit into an overall healthful diet while still allowing for daily indulgences (*e.g.* wine, chocolate, eating/purchasing meals away from home, *etc.*).<sup>34</sup>

NAMI strongly supports nutritional guidance that encourages the consumption of nutrient dense foods, which includes meat and poultry, and moves away from consumption of energy dense foods. This guidance would be more helpful to the average American rather than guidance that ignores the role lean meat contributes to the diet because it would promote energy balance and healthier diets for Americans.

A total diet approach allows inclusion of all foods, including meat and poultry, while emphasizing the importance of a varied and balanced diet within calorie needs. In 2013, the Academy of Nutrition and Dietetics endorsed this total diet approach as the most important focus of a healthful eating style. The DGAC's actions, however, may cause consumers to perceive lean meat as "bad foods," which is inconsistent with the scientific evidence and the total diet approach.<sup>35</sup>

Ignoring the importance of lean meat in the diet of most Americans may have unintended consequences<sup>a</sup>, specifically substituting lean meat for less nutrient dense foods. Concerns about unintended consequences are not a new concept to the DGAC or the agencies. It was frequently stated during the Committee's deliberations that recommendations to eat a low-fat diet have led in part to over-consumption of other food components; Americans merely replaced one over-consumed dietary component with another. Instead, the American public is best served with dietary guidance that provides strategies that help consumers in achieving their healthy diet within their lifestyle constraints.

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<sup>33</sup> National Nutrient Database for Standard Reference, Release 27.

<sup>34</sup> American Meat Institute Comments. Submitted July 7, 2014.

<sup>35</sup> Academy of Nutrition and Dietetics. 2013. AND Position. Total Diet Approach to Communicating Food and Nutrition Information. *J Acad Nutr Diet.* 2013;113:307-317.

## **Sustainability is not within the Purview of the Dietary Guidelines Advisory Committee Expertise**

In October 2014, AMI and NAMA submitted comments on food systems sustainability.<sup>36</sup> Those comments addressed a variety of issues attendant to sustainability, including that sustainability is outside the Committee's expertise and a focus on that issue could dilute the importance of the Committee's nutritional recommendations.

The Committee's statement from the December 15 meeting that a "*dietary pattern higher in plant-based foods, such as vegetables, fruits, whole grains, legumes, nuts and seeds, and lower in animal-based foods is more health promoting and is associated with lesser environmental impact than is the current average U.S. diet*" is disappointing and demonstrates that sustainability is outside the scope of the Committee's expertise. The Committee wrongly assumed if production animal agriculture were eliminated, the food supply as a whole would be more sustainable.

Sustainability is a complex issue being addressed by various experts in a number of other forums, such as Institute of Medicine's *ad hoc* expert committee developing a "Framework for Assessing Health, Environmental, and Social Effects of the Food System."<sup>37</sup> Until those expert panels have drawn more concrete conclusions, it is premature for the Committee to incorporate such considerations into its dietary guidance recommendations. To do so would mean the Committee is acting on incomplete data, which is evident based on a recent study that analyzed the environmental impact of various foods.<sup>38</sup> Researchers wisely observed that many analyses have relied upon environmental impact per pound produced rather than per calorie supplied. When viewed in the latter manner, meat and poultry are quite "green."

As Vieux *et al* noted when fruits and vegetables were iso-calorically substituted for meat there was either no change or even an increase in greenhouse gas emissions because of the amount of fruits and vegetables to maintain the caloric content was so high.<sup>39</sup> This myopic view ignores the simple fact that much of the land used to produce livestock based foods are not arable and cannot be utilized for other food production purposes. It also ignores the critical role animal by-products have in other industries such as development of human medical treatments, clothing, leather goods, and non-traditional food sources, among others.

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<sup>36</sup> American Meat Institute and North American Meat Association Comments. Submitted October 17, 2014.

<sup>37</sup> <http://www8.nationalacademies.org/cp/projectview.aspx?key=49544>. Accessed October 16, 2014.

<sup>38</sup> Drewnowski, A. *et al*. Energy and nutrient density of foods in relation to their carbon footprint. *Am J Clin Nutr*. First published November 5, 2014. <http://ajcn.nutrition.org/content/early/2014/11/05/ajcn.114.092486.abstract>

<sup>39</sup> Vieux, F., Darmon, N., Touazi, D. and Soler, L.G. (2012). Greenhouse gas emissions of self-selected individual diets in France: Changing the diet structure or consuming less? *Ecological Economics*. 75, issue C, p. 91-101.

In general, the Committee did not appreciate the role that processed foods have in the American culture. The DGAC virtually ignored the fact that processed foods, whether meats, canned vegetables, or other products, lend themselves to a more sustainable food supply. Such production practices allow for maximum utilization of crop yields and minimize the potential for food waste. Indeed, during the Committee's evaluation of dietary patterns and sustainability, there has been little recognition or appreciation of the role food processing plays in a sustainable food supply.

The meat and poultry industry has long recognized the importance and necessity of a sustainable food supply. The livestock and poultry industry has historically employed similar production practices praised and encouraged by the Committee for the farmed seafood industry. Livestock producers have been producing food production animals utilizing practices that minimize arable land usage, water and other resources for decades. For instance, on a pound for pound basis, today's farmers use 78 percent less land, 41 percent less water and with a 35 percent smaller carbon footprint to produce pork than farmers did 50 years ago.<sup>40</sup>

Processed meats are another example of the meat and poultry industry's focus on sustainability. Not only is it ethically the right thing to do, but making food products from the entire animal is the most sustainable thing to do. In some cases, nearly 70 percent of the animal goes into processed products. To disregard such a significant portion of the animal is irresponsible, especially when those products provide an affordable, safe and nutrient dense form of protein.

If a sustainable diet is intended to improve both the health of Americans and better utilize natural resources, it must be realistic, achievable, and easily implemented into the American lifestyle. Careful consideration is needed to ensure that sustainable diets are affordable for all Americans and devising a sustainable diet that will be adopted goes beyond cost. Specifically, the nutritional adequacy of potential food group substitutions, food safety, and cultural acceptability also must be considered. The United States has a diverse population and a one-size-fits-all approach cannot be adopted because it will not work. In developing or recommending a sustainable diet, the Committee must recognize the impact that ethnicity, culture, and region has on dietary choices. A diet that may be culturally appropriate in New England may not be recognizable to someone living in Southern Texas. A comprehensive balanced approach is necessary to avoid risk for rejection. Uneaten foods offer no nutritional benefit.

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<sup>40</sup> A 50-year comparison of the carbon footprint and resource use of the U.S. swine herd: 1959-2009. 2012.

## **Dietary Guidance Should Be Practical, Affordable, Attainable and Positive**

The Dietary Guidelines for Americans (DGA) are intended to encourage Americans to focus on eating a healthful diet — one that focuses on foods and beverages that help achieve and maintain a healthy weight, promote health, and prevent disease.<sup>41</sup> After 35 years of dietary guidance, however, Americans have still not changed their eating habits.

As noted in the 2010 *Journal of Nutrition* article by Krebs-Smith *et al*, “nearly everyone fails to meet the Dietary Guidelines.”<sup>42</sup> Many factors can explain the difference between the recommendations and consumer behavior, such as cultural forces, societal norms, family influences, personal food preferences, changes in meal patterns, food availability, advertising, and a lack of an understanding of how to translate dietary guidance into realistic and permanent lifestyle behaviors, among others.<sup>43,44</sup>

Consumer research in 2011 found that 82 percent of adults in the U.S. cited “not wanting to give up foods they like” as a reason for not eating healthier.<sup>45</sup> The International Food Information Council’s 2013 Food & Health Survey found that Americans think they should consume a more balanced diet in general, including eating more fruits and vegetables and fewer sweets and snacks.<sup>46</sup> This thinking supports the need for moderation and proportionality when developing achievable and practical dietary guidance. These concepts prevent consumers from relying on radical changes such as eliminating certain foods or food groups from their diet. Research shows when this sort of extreme attitude is adopted, individuals set themselves up for failure.<sup>47</sup> When developing the 2015 DGA, it is important to consider these factors and provide realistic guidance that will help Americans achieve a more healthful diet.

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<sup>41</sup>U.S. Department of Agriculture and U.S. Department of Health and Human Services. Dietary Guidelines for Americans, 2010. 7th Edition, Washington, DC: U.S. Government Printing Office, December 2010.

<sup>42</sup> Krebs-Smith S, Guenther P, Subar A, Kirkpatrick S, Dodd K. Americans Do Not Meet Federal Dietary Recommendations. *J Nutr.* 2010; 140: 1832-1838.

<sup>43</sup> Rowe S, Alexander N, Almeida N, Black R, Burns R, Bush L, Crawford P, Keim N, Kris-Etherton P, Weaver C. Food science challenge: Translating the Dietary Guidelines for Americans to bring about real behavior change. *J Food Sci.* 2011;76:R29–R37.

<sup>44</sup> International Food Information Council Foundation. 2012 Food & Health Survey. Accessed April 17, 2014. Available at [http://www.foodinsight.org/Resources/Detail.aspx?topic=2012\\_Food\\_Health\\_Survey\\_Consumer\\_Attitudes\\_toward\\_Food\\_Safety\\_Nutrition\\_and\\_Health](http://www.foodinsight.org/Resources/Detail.aspx?topic=2012_Food_Health_Survey_Consumer_Attitudes_toward_Food_Safety_Nutrition_and_Health).

<sup>45</sup> Academy of Nutrition and Dietetics. Nutrition and you: Trends 2011. <http://www.eatright.org/nutritiontrends>. Accessed August 21, 2014.

<sup>46</sup> International Food Information Council Foundation. 2013 Food & Health Survey. Accessed July 5, 2014. Available at <http://www.foodinsight.org/Content/3840/FINAL%202013%20Food%20and%20Health%20Exec%20Summary%206.5.13.pdf>

<sup>47</sup> Zywiak WH, Connors GJ, Maisto SA *et al*. Relapse Research and the Reasons for Drinking Questionnaire: A factor analysis of Marlatt’s relapse taxonomy.

## **Summary**

Meat and poultry are an integral part of the American diet and the DGAC's failure to recognize the role of lean meat as a component of a healthy eating pattern is concerning and ill considered. Indeed, the Committee's last minute, back room decision to omit "lean meats" in a healthy pattern because of the purported absence of a definition of "lean meat" calls the Committee's final recommendation into serious doubt. It also reflects either an astonishing lack of awareness of the scientific evidence or a callous disregard of that evidence, again calling into question the entirety of the recommendations submitted by the DGAC to the agencies.

We encourage the agencies to include lean meat and poultry as a component of a healthy eating pattern. There is a risk that the foods chosen to replace lean meat and poultry will be less nutrient dense, especially as protein foods are the only foods consistently consumed at recommended levels. Reducing or limiting nutrient dense lean meats and increasing nutrient poor foods could have serious, adverse consequences. This risk would become real if the agencies incorporate this recommendation into federal policy because it will affect many programs, such as Supplemental Nutrition Assistance Program, WIC, National School Lunch Program, and other adult and child nutrition programs. Many Americans who use these programs are often at-risk nutritionally and losing a nutrient dense food option like lean meat and poultry could affect their intake of protein, iron, and other nutrients mentioned previously.

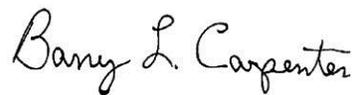
The Committee's recommendations are flawed in other respects. Sustainability is a complex issue that demands consideration of an array of scientific issues by experts in those fields. To recommend a "sustainable dietary pattern" when the very definition of sustainable is still at issue does a disservice to the importance of affordability, nutrient adequacy, safety and cultural relevance to the foods consumed by U.S. population. In addition, the recommendations fail to recognize that dietary guidance should be practical, affordable, and attainable. Recognizing and respecting the traditional eating patterns of the average American and providing guidance about how they can eat a more healthful diet within the context of their existing food choices is critical.

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The meat and poultry industry is committed to providing safe, wholesome, and diverse nutritious products to consumers so they may make educated decisions in choosing the foods that best fit their personal lifestyle and family needs. These products include fresh, lean and processed meat and poultry products.

Thank you for the opportunity to provide comments regarding the 2015 DGA development process.

Respectfully submitted,



Barry L. Carpenter  
President and CEO

cc: The Honorable Sylvia Mathews Burwell, Secretary of Health and Human Services  
The Honorable Tom Vilsack, Secretary of Agriculture  
The Honorable Dr. Karen DeSalvo, Acting Assistant Secretary for Health, U.S. Department of Health and Human Services  
The Honorable Kevin Concannon, Under Secretary, Food, Nutrition, and Consumer Services, U.S. Department of Agriculture