



August 13, 2020

Secretary Sonny Perdue
U.S. Department of Agriculture
1400 Jefferson Drive SW
Washington, DC 20024

Secretary Alex M. Azar
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

RE: Scientific Report of the 2020 Dietary Guidelines Advisory Committee

Submitted electronically to docket FNS-2020-0015 at <http://www.regulations.gov>.

Dear Secretaries Perdue and Azar:

We are grateful for the opportunity to comment on the 2020 Dietary Guidelines Advisory Committee Scientific Report (the Report) as you work to finalize the 2020-2025 Dietary Guidelines for Americans. The National Pork Producers Council (NPPC) is the global voice for the U.S. pork industry and consists of 42 affiliated state organizations representing America's 60,000 pork producers. U.S. pork producers are proud of the strong contribution they make towards ensuring that Americans enjoy a healthy, varied, and affordable diet.

We are pleased that the Report continues to highlight the important role that animal products play in ensuring sufficient protein and other nutrients in the American diet. Pork products are one of the most widely consumed and enjoyed sources of protein in the U.S. diet, and the report highlights the fact that lean meats—such as most cuts and many preparations of pork—can make positive contributions to health. This is reflected in the current Healthy U.S.-style and Healthy Mediterranean-style dietary patterns, and we support the Report's recommendations that diets for the age group 12-24 months incorporate a variety of nutrient-rich animal products.

As your agencies work to finalize the 2020-2025 Dietary Guidelines for Americans, we ask that you consider three issues when translating the scientific findings of the Report into guidance for the American public. First, that "red and processed meats" are a diverse product group that should not be over-generalized. Second, that recommendations concerning consumption of "red and processed meats" from the Report be carefully translated. Finally, we ask that no action be taken on the Report's suggestion that your agencies "support efforts to consider the Dietary Guidelines in relation to sustainability of the food system."

NPPC asks that your agencies use caution when providing dietary recommendations regarding types of foods that are defined by the Report to include a very broad range of nutritionally diverse products, such as “red and processed meats.” The 2015-2020 Dietary Guidelines for Americans outlined definitions for “red and processed meats” that appear to have been carried forward by the Report. The previous guidelines stated that “Meat, also known as red meat, includes all forms of beef, pork, lamb, veal, goat, and non-bird game (e.g., venison, bison, and elk).” Further, processed meats and poultry were defined as “products preserved by smoking, curing, salting, and/or the addition of chemical preservatives” with examples of sausages, luncheon meats, bacon, and beef jerky provided. Taken together, this definition of “red and processed meats” encompasses an extremely wide variety of food products with very diverse nutrient profiles not only in terms of the vitamins, minerals, and macronutrients they provide, but also in regard to calories, saturated fat, and sodium levels. This definition also does not consider the varying cooking, preparation, and processing methods used, which may affect a product’s overall dietary contributions.

Broad and generic dietary recommendations about “red and processed meat” as a whole may disparage lean red meats (e.g., lean pork tenderloin) and innovative processed meat products (e.g., low-sodium luncheon meat) that provide protein and essential nutrients to the diets of many Americans. This is a concern given that food pattern modeling suggests that lean red meats, when consumed as part of healthy eating patterns, can contribute important nutrients to the diet while staying within recommended limits for sodium, saturated fat, added sugar, and calories. Therefore, we strongly urge that the agencies use caution when making broad and generic dietary recommendations about “red and processed meats” and recognize the diverse nature of the products within this pre-defined category.

NPPC asks that your agencies carry forward the acknowledgment that healthy dietary patterns “May include processed meats and processed poultry as long as the resulting eating pattern is within limits for sodium, calories from saturated fats and added sugars, and total calories.” As outlined above, today’s Americans enjoy a large assortment of lean meat products and innovative processed meats tailored to the recommended limits for sodium, saturated fat, added sugar, and calories that have a place within healthy dietary patterns.

It is essential that the Report’s finding that “red and processed meat” products have been linked to negative health outcomes, if referenced at all in the 2020-2025 Dietary Guidelines for Americans, be clearly associated with *over* consumption of these products. Consumption of these products within the recommended allowances should not be stigmatized. Indeed, there are cohorts within the American public that are currently under-consuming essential nutrients readily provided by pork products. The 2020-2025 Dietary Guidelines for Americans must respect the critical role that “red and processed meats” play in the U.S. diet and not contain conflicting or ambiguous directions to “eat less red and processed meats” targeted at individuals or cohorts consuming these products as part of a healthy dietary pattern.

NPPC asks that no action be taken on the Report's suggestion that your agencies "support efforts to consider the Dietary Guidelines in relation to sustainability of the food system."

The sustainability of American agriculture is an important topic, and one that U.S. pork producers take very seriously. However, considerations of sustainability—or more broadly food and agriculture production methods and practices—are not part of the Congressional mandate establishing the framework for either developing or implementing the Dietary Guidelines for Americans.

In conclusion, we encourage your agencies to use caution when making broad and generic dietary recommendations about "red and processed meats." This is simply to diverse, and important, a group of foods to generalize and is one of the preeminent—and healthy—sources of protein in the American diet. The American public must remain confident that they can continue to consume and enjoy pork products as part of a healthy eating pattern.

We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Kovich', with a long, sweeping horizontal stroke extending to the right.

Daniel A. Kovich, DVM, MPH
Director of Science and Technology
National Pork Producers Council