



VIA ELECTRONIC SUBMISSION

May 16, 2022

Janet M. de Jesus, MS, RD
Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary, Department of Health and Human Services
1101 Wootton Parkway, Suite 420
Rockville, Maryland 20852

Re: Request for Comments on Scientific Questions To Be Examined To Support the Development of the Dietary Guidelines for Americans, 2025-2030 (Docket No. HHS-OASH-2022-0005-0001)

Dear Ms. De Jesus:

The National Pork Producers Council (NPPC) is the global voice for the US pork industry and consists of 43 affiliated state organizations representing America's 60,000 pork producers who produce a demonstrably safe, wholesome and nutritious product that is appreciated on American and international tables. As you look towards updating the Dietary Guidelines for Americans, we thank you for the opportunity to comment and appreciate the government's effort to provide transparency during this five-step process.

Dietary Patterns

NPPC supports the Agencies' attention to diet and health outcomes including the relationship of diet to the risk of overweight and obesity. We continue to see overweight and obesity conditions getting worse, especially among the racial and ethnic minority groups.¹ However, we are concerned that the scientific questions do not adequately allow for the review of all relevant data to better understand how different dietary patterns can play a role in reducing the risk of overweight and obesity. With the connection of these conditions with non-communicable diseases such as diabetes and heart disease, it is critical to ensure we are reviewing all relevant data that can help lead to better recommendations.

It is for these reasons **that we support a scientific question that specifically reviews the impact of all low carbohydrate diets, including those with less than 25% total calories, on overweight, obesity, diabetes and heart disease.** Research has demonstrated that these diets have a positive effect on A1C levels and HDL cholesterol. Given the significant focus that the agencies are putting on overweight and obesity, we strongly believe it would be a misstep to omit dietary patterns that have been shown through extensive research to move the needle.

¹ Center for Disease Control and Prevention, <https://www.cdc.gov/obesity/data/obesity-and-covid-19.html>

Scope of Dietary Guidelines

NPPC also appreciates the recognition that, while an important topic, sustainability is outside the scope of the Dietary Guidelines. The issue is best discussed in a holistic manner with a wide range of experts.

Thank you for your consideration of these comments. Please contact Andrew Bailey if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Bailey". The signature is fluid and cursive, with a large initial "A" and a stylized "Bailey".

Andrew Bailey
Science & Technology Legal Counsel
National Pork Producers Council