

September 6, 2024

The Honorable Glenn Thompson  
Chair  
House Committee on Agriculture  
United States House of Representatives

The Honorable David Scott  
Ranking Member  
House Committee on Agriculture  
United States House of Representatives

The Honorable Debbie Stabenow  
Chair  
Senate Committee on Agriculture, Nutrition,  
and Forestry  
United States Senate

The Honorable John Boozman  
Ranking Member  
Senate Committee on Agriculture, Nutrition,  
and Forestry  
United States Senate

Dear Chairs Thompson and Stabenow, and Ranking Members Scott and Boozman,

The undersigned organizations write to express strong opposition to proposed changes to the Dietary Guidelines for Americans (DGA) development process included in the Farm, Food and National Security Act of 2024 (H.R. 8467).<sup>1</sup>

The DGA are foundational to public health, influencing not only individual dietary choices but also informing guidelines for federal nutrition and safety net programs.<sup>2</sup> These programs include the National School Lunch and School Breakfast Programs and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC); approximately 30 million children participate in school meals and 6.6 million people participate in WIC, demonstrating the broad reach of the DGA.<sup>3,4</sup> **The bill's proposed changes would undermine the scientific integrity of the DGA, harm public health outcomes, and exacerbate health inequities.**

We are deeply concerned that the bill's proposed changes to the DGA process would:

1. **Undermine Scientific Integrity:** The DGA have historically been and should continue to be based on rigorous scientific research and expert consensus. In contrast, the proposed changes appear to be driven by political and industry influence rather than sound science. Half of the proposed "Independent Advisory Board" would be appointed by the U.S. Departments of Agriculture and Health and Human Services and half by Members of Congress, resulting in an explicitly politicized group rather than scientific experts chosen for their qualifications. This is problematic for the scientific integrity of the DGA because this Board would generate the

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<sup>1</sup> H.R.8467 - 118th Congress (2023-2024): Farm, Food, and National Security Act of 2024. (2024, May 21). <https://www.congress.gov/bill/118th-congress/house-bill/8467/text>

<sup>2</sup> U.S. Department of Agriculture and U.S. Department of Health & Human Services. Dietary Guidelines for Americans 2020- 2025. [https://www.dietaryguidelines.gov/sites/default/files/2020-12/Dietary\\_Guidelines\\_for\\_Americans\\_2020-2025.pdf](https://www.dietaryguidelines.gov/sites/default/files/2020-12/Dietary_Guidelines_for_Americans_2020-2025.pdf).

<sup>3</sup> Food and Nutrition Service. National School Lunch Program: Participation and Lunches Served. Data as of July 12, 2024. <https://fns-prod.azureedge.us/sites/default/files/resource-files/slsummar-7.pdf>

<sup>4</sup> U.S. Department of Agriculture Economic Research Service. Food and Nutrition Assistance: WIC Program. Updated December 2023. <https://www.ers.usda.gov/topics/food-nutrition-assistance/wic-program/> Accessed September 4, 2024.

scientific questions to be examined by the Dietary Guidelines Advisory Committee (DGAC). Therefore, this Board would define the list of topics included in the DGAC's review of evidence and limit what is ultimately included in the DGA.

Additionally, updating the DGA every 5 years is a rewarding undertaking, and we oppose language (such as "as necessary") that does not set a defined timeline for a regular and robust review of the scientific literature to inform evidence-based guidelines. Without this regularly scheduled review, we run the risk that updates to the DGA would be delayed indefinitely.

**2. Harm Public Health:** Allowing politics and special interests to undermine the scientific integrity of the DGA process is likely to lead to vague or misguided recommendations that deviate from the preponderance of scientific evidence. Departures from evidence-based recommendations to reduce rates of diet-related diseases (including obesity, diabetes, cardiovascular diseases, and certain cancers) could increase the prevalence rates of these diseases. Because the DGA form a critical component of so many wide-reaching policies and programs, any negative health impacts will be projected across the US population, increasing long-term healthcare costs.

**3. Exacerbate Health Inequities: The DGA are particularly crucial for socioeconomically disadvantaged populations,** including children, the elderly, and low-income families who rely on federal nutrition programs guided by the DGA. Compromising these standards will exacerbate inequitable access to healthy food and increase the risk of diet-related disease for communities that are already disproportionately impacted.

Another problematic provision would limit the questions the DGAC can consider; their report would be prohibited from including: "Taxation, social welfare policies, purchases under Federal feeding programs, food and agricultural production practices, food labeling, socioeconomic status, race, ethnicity, or culture, or regulations relating to nutrition." **This language would prohibit consideration of topics that impact dietary choices across diverse cultures, races, and ethnicities.** It would also prevent discussions about the DGA impact on the Supplemental Nutrition Assistance Program (SNAP), the WIC food packages, and sustainability of the food system.

**We urge Members of Congress to reject the proposed changes to the DGA process in the Farm, Food, and National Security Act of 2024 and to uphold our government's commitment to evidence-based nutritional guidance.** Ensuring that our dietary recommendations remain scientifically sound and free from undue influence is essential to safeguarding the health of our nation and our place as a global leader in public health nutrition.

Thank you for your attention to this critical issue. We look forward to your leadership in protecting the integrity of the DGA and promoting the health and well-being of our nation.

Signed,

Academy of Nutrition and Dietetics  
ActivEnergy Nutrition LLC  
American Academy of Pediatrics  
American Cancer Society Cancer Action Network  
American Heart Association  
An Ounce of Nutrition  
Balanced  
Celiac Disease Foundation  
Center for Biological Diversity  
Center for Science in the Public Interest  
Ceres Community Project  
Changelab Solutions  
Chef Ann Foundation  
Chilis on Wheels  
Colorado Academy of Nutrition and Dietetics  
Community Food Advocates  
Daily Dietetics, LLC  
Defeat Malnutrition Today  
Dental Group San Diego  
Farm Forward  
Farm Sanctuary  
Food Research & Action Center (FRAC)  
Health Care Without Harm  
Healthy Food America  
Healthy Schools Campaign  
Just Serve LCC  
Kala Nutrition, LLC  
Let's Love Food Again  
McCrea & Associates, Nutrition Management Systems  
National Association of Nutrition and Aging Services Programs (NANASP)  
National Association of Pediatric Nurse Practitioners  
National Center for Health Research  
National Farm to School Network  
National League for Nursing  
National WIC Association  
Nebraska Appleseed  
Nutrition Edge Communications  
Partnership for a Healthier America

Pennsylvania Academy of Nutrition & Dietetics (PAND)  
Physicians Committee for Responsible Medicine  
Pinnacle Prevention  
Plant Forward Endurance Nutrition  
Striving to Serve Others  
True Health Initiative