

October 7, 2024

Sarah Booth, PhD  
Chair, 2025 Dietary Guidelines Advisory Committee

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

**Re: 2025 Dietary Guidelines Advisory Committee Proposed Nutrient Density Conclusions  
(Docket No. HHS-OASH-2022-0021)**

Dear Dr. Booth and members of the Dietary Guidelines Advisory Committee,

The undersigned organizations respectfully submit the following comment regarding the synthesis statement presented during the September 25, 2024 public meeting for the question:

**What quantities of foods and beverages lower in nutrient density can be accommodated in the USDA Dietary Patterns while meeting nutritional goals within calorie levels?**

During meeting 6 of the 2025 Dietary Guidelines Advisory Committee (DGAC), the Food Pattern Modeling and Data Analysis Subcommittee proposed a modification to the presentation of all Healthy U.S.-Style dietary patterns across all life stages starting at 2 years that would *not* include a “Limit on Calories for Other Uses.” As proposed, this modification would eliminate specific quantities (calories and percentages) of remaining daily calories for other uses when dietary pattern recommendations are presented across all life stages. We understand that the amount of discretionary calories available for individuals after meeting food group recommendations varies, which complicates the establishment of a one-size-fits-all limit. However, we are concerned that excluding quantitative limits on total calories for other uses could preclude the DGAC from recommending quantitative limits on daily calories from saturated fat and added sugar. Food pattern modeling of discretionary calories by the 2020 DGAC informed that committee’s recommended limit for calories from added sugars and saturated fat.

As you know, recent editions of the *Dietary Guidelines for Americans* (DGA) included quantitative limits for added sugars and saturated fat intake. The 2020-2025 DGA recommends:

- Individuals aged 2 years and older consume less than 10% of calories per day from added sugars & less than 10% of calories per day from saturated fat<sup>1</sup>

These recommendations are indispensable for evidence-backed food labeling, providing dietary advice to individuals and communities, and informing nutrition standards and guidance used

across federal nutrition programs and policies. For example, federal nutrition assistance programs such as the National School Lunch Program would be impacted: the United States Department of Agriculture (USDA) issued a new final rule on Requirements for School Meal Programs in April 2024 that updates school meal nutrition standards to bring them in closer alignment with the added sugar limit recommended in the 2020-2025 DGA.<sup>ii</sup> This and future efforts to improve nutrition standards depend on the existence of clear quantitative recommendations. Furthermore, without quantitative limits on calories from saturated fat and added sugars in the DGA, the recommended daily values for saturated fat and added sugars in Nutrition Facts labels may have limited scientific backing, thereby impacting consumer access to accurate nutrition information.

Rather than removing quantitative limits on calories for other uses, the 2025 DGAC's conclusions provide justification to *lower* the recommended limits on calories from saturated fat and added sugar: the Food Pattern Modeling results showed that when the nutrient dense forms of foods and beverages were used to model the healthy dietary pattern at a particular calorie level, 86% of calories came from proposed food groups and subgroups, less than 2% of calories were from added sugars, and approximately 6% of calories were from saturated fat in the modeled foods. Therefore, the modeled dietary pattern met approximately 94% of the calorie limit, leaving only 6% of daily calories that could theoretically be allocated to discretionary calories. This evidence is closely aligned with the American Heart Association's recommended limits of 6% of daily calories available for added sugars and saturated fat.<sup>iii,iv</sup> The 2020 DGAC similarly found that most people cannot accommodate 10% of calories from added sugars in their diet while meeting nutrient needs and limits on total calories; instead, "...less than 6% of energy from added sugars is more consistent with a dietary pattern that is nutritionally adequate."<sup>v</sup>

In the final meeting of the DGAC and in the final scientific report, we urge the 2025 DGAC to:

- **Clarify the intended impact of this proposal** on the DGA's recommended limits for discretionary calories from added sugar and saturated fat.
- Support evidence-based recommendations that uphold **strong, quantitative limits on calories from added sugar and saturated fat** to inform nutrition policy and individual dietary behavior.

Thank you for your work on critical nutrition guidance.

Signed,

**American Cancer Society Cancer Action Network**

**Balanced**

**Center for Science in the Public Interest**

## Laurie M. Tisch Center for Food, Education & Policy

### National WIC Association

### Physicians Committee for Responsible Medicine

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<sup>i</sup> U.S. Department of Health and Human Services and U.S. Department of Agriculture. *Executive Summary: 2020-2025 Dietary Guidelines for Americans*. 9th Edition. Page 4. December 2020.

[https://www.dietaryguidelines.gov/sites/default/files/2020-12/DGA\\_2020-2025\\_ExecutiveSummary\\_English.pdf](https://www.dietaryguidelines.gov/sites/default/files/2020-12/DGA_2020-2025_ExecutiveSummary_English.pdf)  
Accessed October 2, 2024.

<sup>ii</sup> U.S. Department of Agriculture. *Comparison Chart of the 2023 Proposed and 2024 Final Rule Requirements for School Meal Programs: Added Sugars*. July 2024. <https://www.fns.usda.gov/cn/school-nutrition-standards-updates/rule-comparison-chart>. Accessed October 2, 2024.

<sup>iii</sup> American Heart Association. *Added Sugars: How much added sugar is OK?* <https://www.heart.org/en/healthy-living/healthy-eating/eat-smart/sugar/added-sugars> Accessed October 1, 2024.

<sup>iv</sup> American Heart Association. *Saturated Fats: AHA Recommendation*. <https://www.heart.org/en/healthy-living/healthy-eating/eat-smart/fats/saturated-fats> Accessed October 1, 2024.

<sup>v</sup> DGAC (Dietary Guidelines Advisory Committee). *Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and the Secretary of Agriculture*. 2020. Washington, DC: US Department of Agriculture. Pg. 11. [https://www.dietaryguidelines.gov/sites/default/files/2020-07/ScientificReport\\_of\\_the\\_2020DietaryGuidelinesAdvisoryCommittee\\_first-print.pdf](https://www.dietaryguidelines.gov/sites/default/files/2020-07/ScientificReport_of_the_2020DietaryGuidelinesAdvisoryCommittee_first-print.pdf)