



February 10, 2025

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: Docket HHS-OASH-2022-0021, 2025 Dietary Guidelines for Americans (DGA) Committee

To Ms. de Jesus,

Thank you for the opportunity to comment on the *2025 Dietary Guidelines Advisory Committee's (DGAC) Scientific Report* and for the collective efforts of the United States Department of Agriculture and Health and Human Services to address nutrition advice, which serves as a roadmap for federal nutrition programs such as the National School Lunch Program and School Breakfast Program.

The Chef Ann Foundation is a national non-profit dedicated to promoting whole-ingredient, scratch cooking in schools. Scratch cooking enables schools to serve the healthiest, tastiest meals so that students are well-nourished and ready to learn. To date, the Chef Ann Foundation has reached more than 13,500 schools and 3.3 million students.

Our mission is to ensure that school food professionals have the resources, funding, and support they need to provide fresh, healthy, delicious, cooked from scratch meals that support the health of children and our planet. Scratch, whole-ingredient cooking in schools is a vehicle to achieving many different goals on our path forward to healthier communities, including the reduction of ultra-processed foods in schools.

The evidence-based recommendations outlined by the DGAC are a positive step forward in ensuring that school meals remain a healthy option for students across the country. The following are our comments and recommendations regarding the DGAC's report:

- **Ultra-Processed Foods:** We urge decisionmakers to formally define “ultra-processed” in order to provide better research and guidance on consumption. The DGAC acknowledges the negative health effects of ultra processed-foods (UPFs) but notes that a limited evidence base resulted in their exclusion of any recommendations from the DGAs. We echo calls from the Committee and partners for further research and funding to study ultra-processed foods so that consumers - particularly our school food professionals - have clear guidance on identifying UPFs and dietary patterns that reduce their consumption, leading to better health outcomes for the nearly 30 million children that eat school lunch every day.
- **Healthy Diet Pattern:** We support the DGAC's description of a healthy dietary pattern, particularly the recommendation to increase the consumption of vegetables, fruits, whole grains, nuts, and fish as a protein source. Additionally, we recommend the reduction of ultra-processed red meat consumption.
- **Added Sugar, Saturated Fat, and Sodium:** We support the DGAC's recommendation to maintain the 2020-2025 DGA limits on added sugar, saturated fat, and sodium in the 2025-2030 DGA and urge the Departments to maintain these limits.
- **Plant-Forward:** We recommend an increased emphasis on plant-forward meals using whole ingredients that are cooked from scratch and a reduction in heavily processed meals and ingredients. Plant-forward diets align with current U.S. dietary guidelines that suggest increasing fiber intake and diversifying sources of protein.^{1,2} Plant-based foods also have a variety of preventative health benefits, including reducing the risk of coronary heart disease, preventing type 2 diabetes, and reducing cancer risk when compared with a diet that includes heavy consumption of red and processed meat.³⁻⁷
- **Flexibility and Representation:** We urge the Departments to clearly illustrate how healthy dietary patterns can be adapted for different cultures, dietary preferences, and budgets. Expanding beyond Euro-centric diet models in school meal programs could reduce food stigmas held among families and students as it demonstrates that all cultures can be represented in food and that not only one type of person or group of people participates in

school food programs.⁸ The newly proposed dietary pattern enhances flexibility and representation and can increase uptake of the DGA's guidance as long as these flexibilities are clearly communicated.

- **Sustainability:** We urge inclusion of environmental sustainability in the guidelines. The DGAC report makes no mention of sustainability as a part of the Dietary Guidelines for Americans, however, sustainability can help promote better health outcomes while safeguarding our climate and food security. Sustainability is inextricably tied to dietary health. Diets that are more sustainable are also more nutritious and help prevent chronic disease.^{9,10} Sustainable diets are needed to protect communities that tend to suffer the worst effects of climate change,¹¹ pollution,¹² malnutrition,¹³ diet-related disease,¹⁴ and food insecurity.¹⁵

Thank you for your collective efforts to address nutrition advice and guidance, especially for school food programs. Students need healthy food and nutrition to fuel their growth and learning, and the DGAC's guidelines are a positive step forward in ensuring all students have the healthy food they deserve.

Sincerely,

A handwritten signature in black ink, appearing to read "Mara Fleishman".

Mara Fleishman

Chief Executive Officer, Chef Ann Foundation



References

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