



May 10, 2023

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: Comments to the 2025 Dietary Guidelines Advisory Committee (Docket OASH-2022-0021)

Dear Ms. De Jesus:

The Institute of Shortening and Edible Oils (ISEO) appreciates the opportunity to provide input for consideration by the 2025 Dietary Guidelines Advisory Committee (Docket No. HHS-OASH-2022-0021-0001).

### **Background on ISEO**

ISEO submits these comments on behalf of U.S. refiners who produce 95 percent of domestic edible fats and oils from the following commodities: U.S. grown soybean, U.S. grown corn, U.S. grown cottonseed, U.S. grown canola, U.S. grown sunflower, U.S. grown safflower, U.S. grown rice, U.S. produced lard, tallow, and wheat germ, as well as imported commodities such: olive, palm, palm kernel, coconut, canola and sunflower) used for a wide variety of edible applications which include baking, frying, spray oils, spreads, margarine and other food uses to provide nutrition and functionality. Fats and oils are also used in animal feeds as a source of energy and essential fatty acids.

### **Background on fats and oils**

Fats and oils are an important part of both human and animal diets, providing naturally occurring essential nutrients and key functionality, while enhancing the eating experience.

- **Essential Nutrients:** Fats and oils are recognized as essential nutrients in both human and animal diets. Nutritionally, they are concentrated sources of energy (9 Kcal/gram), provide essential fatty acids which are the building blocks for the hormones needed to regulate bodily systems; and are a carrier for the oil soluble vitamins A, D, E, and K.
- **Enhance the Eating Experience:** Fats and oils enhance the foods we eat by providing texture and mouth feel, imparting flavor, and contribute to the feeling of satiety after eating.
- **Provide Key Functionality:** Fats and oils are important functionally in the preparation of many food products. They act as tenderizing and release agents, facilitate aeration, carry flavors and colors, and provide a heating medium for food preparation.
- **Naturally Occurring:** Human and animal diets have always contained fats and oils, which are naturally present in many foods, such as meats, dairy products, poultry, fish, and nuts.

### **Dietary Guidelines on Fats, Oils, and Saturated Fat**

As you are working to update the [2020-2025 Dietary Guidelines for Americans](#) (DGA), we wanted to highlight the current language regarding fats and oils:

“Oils are important to consider as part of a healthy dietary pattern as they provide essential fatty acids. Commonly consumed oils include canola, corn, olive, peanut, safflower, soybean, and sunflower oils. Oils also are naturally present in nuts, seeds, seafood, olives, and avocados. The fat in some tropical plants, such as coconut oil, palm kernel oil, and palm oil, are not included in the oils category because they contain a higher percentage of saturated fat than do other oils”. (Chapter 1, Page 35)

“Strategies to shift intake include cooking with vegetable oil in place of fats high in saturated fat, including butter, shortening, lard, or coconut oil.” (Chapter 1, Page 35)

Moreover, the 2020-2025 DGA included the following language on saturated fats:

“For those 2 years and older, intake of saturated fat should be limited to less than 10 percent of calories per day by replacing them with unsaturated fats, particularly polyunsaturated fats”. (Chapter 1, Page 44)

“Approximately 5 percent of total calories inherent to the nutrient-dense foods in the Healthy U.S.-Style Dietary Pattern are from saturated fat from sources such as lean meat, poultry, and eggs; nuts and seeds; grains; and saturated fatty acids in oils. As such, there is little room to include additional saturated fat in a healthy dietary pattern while staying within limits for saturated fat and total calories”. (Chapter 1, Page 44)

Strategies to lower saturated fat intake “include reading food labels to choose packaged foods lower in saturated fats and choosing lower fat forms of foods and beverages. When cooking and purchasing meals, select lean meat and lower fat cheese in place of high-fat meats and regular cheese—or replace them with ingredients with oils, such as nuts, seeds, or avocado. Cook and purchase products made with oils higher in polyunsaturated and monounsaturated fat (e.g., canola, corn, olive, peanut, safflower, soybean, and sunflower) rather than butter, shortening, or coconut or palm oils”. (Chapter 1, Page 44)

We are pleased the 2020-2025 DGA acknowledged the importance of oils and essential fatty acids. However, as you work on the next edition we ask that you not promote overly simplistic solutions that favor one edible oil over another as this can create consumer confusion and result in unintended consequences. Edible oils have different nutrition profiles, amounts of essential nutrients, functionality and uses, market prices, and environmental and sustainability impacts. There is room for all edible oils in the market and in most diets based on individual health needs, wellness goals, tastes, and preferences. ISEO supports a focus on consumer education. Consumers have individual needs to achieve optimal health outcomes which first starts with the proper education and the need for diet literacy.

### **Scientific Questions**

*ISEO recommends the DGAC finalize its proposed questions.*

ISEO recommends that prior to any review of the scientific evidence by the DGAC, the proposed questions need to be finalized. We are concerned that reviewing evidence prior to finalizing the scientific questions could result in revisions to the questions which no longer align with the intention of the proposed questions, or that review of limited evidence could bias the Committee’s deliberations around the scientific question.

***ISEO asks the Committee to consider numerous factors as it considers the scientific question on saturated fat and risk of CVD.***

Particularly important to our members is the question: “*What is the relationship between food sources of saturated fat consumed and risk of cardiovascular disease (CVD)?*” ISEO recognizes and appreciates there is interest in better understanding the relationship between food sources of saturated fat and risk of CVD, however it is our view that in order to promote general health and reduce the burden of chronic diseases such as CVD, attention should be focused wholistically on “improving the overall diet quality by increasing consumption of core-healthy foods and lowering consumption of energy-dense, nutrient-poor foods” as outlined in the study titled [\*Diet Quality Assessment and the Relationship between Diet Quality and Cardiovascular Disease Risk.\*](#)

Further, the aforementioned study submits that “There is consensus that a healthy diet is abundant in vegetables, fruits, whole grains, legumes, nuts and seeds, low-fat dairy, and lean protein foods, and is low in saturated fat, added sugar, and sodium. Thus, rather than debating recommendations for specific foods, food groups, or nutrients, attention should be focused on the totality of the diet and areas of relative agreement about core-healthy foods and developing strategies that can effectively shift the population towards higher diet quality”.

Finally, as it relates specifically to saturated fats and risk of CVD “There is ongoing debate as to whether public health guidelines should advocate reducing saturated fatty acid (SFA) consumption as much as possible to reduce the risk of chronic diseases, especially cardiovascular disease (CVD)” as outlined in the study titled [\*Public health guidelines should recommend reducing saturated fat consumption as much as possible: Debate Consensus.\*](#) In considering both sides of this question, the authors of the aforementioned study “identified a number of points of agreement, most notably that the overall dietary patterns in which SFAs are consumed are of greater significance for cardiometabolic and general health than SFA intake alone. Nevertheless, there remained significant disagreements, centered largely on the interpretation of evidence bearing on 4 major questions:

- 1) does reducing dietary SFAs lower the incidence of CVD
- 2) is the LDL-cholesterol reduction with lower SFA intake predictive of reduced CVD risk
- 3) do dietary SFAs affect factors other than LDL cholesterol that may impact CVD risk, and
- 4) is there a sufficient rationale for setting a target for maximally reducing dietary SFAs?”

The authors identified specific research needs for addressing knowledge gaps that have contributed to the controversies on this topic. ISEO recommends the Committee consider these essential factors when finalizing the scientific question on saturated fat and risk of CVD.

***ISEO encourages DGAC consider nutrient density and the benefits of processing when considering its recommendations.***

ISEO is also concerned about the proposed question: “*What is the relationship between consumption of dietary patterns with varying amounts of ultra-processed foods and growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance?*” ISEO firmly believes that processed foods can and will be part of a broader solution to meet specific dietary needs.

Processed foods and ingredients are under continuous improvement to meet consumer needs and demands such as nutrition needs, shelf-life, functionality, and taste. Processed foods can utilize specialty ingredients to radically improve nutritional profiles and to reduce sodium, saturated fat, and added sugars while simultaneously increasing needed nutrients like essential fatty acids, dietary fiber, choline, vitamins, and minerals. Processing is undertaken for consistency purposes and to improve shelf life,

application use/functionality, nutritional value, and safety. Processing also contributes to the reduction of food waste, elimination of contaminants, reduction of allergens, the increase in nutritional quality, and the improvement of digestibility.

The versatility of processing allows consumers with special dietary needs or goals to have options such as gluten-free and allergen-free foods. The Food and Agriculture Organization has made many of the above points in its own science-based nutrition guidance publications, including in its 2008 Expert Consultation on Fats and Fatty Acids in Human Nutrition. We strongly believe that research on the nutritional and health contributions of processed foods should be assessed, particularly for those products which are positively contributing to nutrient intake for critically under-consumed nutrients. This is demonstrated in a study titled [\*Some Ultra-Processed Foods Are Needed for Nutrient Adequate Diets: Linear Programming Analyses of the Seattle Obesity Study\*](#), which indicates that “Typical diets include an assortment of unprocessed, processed, and ultra-processed foods” and “Ultra-processed foods also contributed most vitamin E, thiamin, niacin, folate, and calcium, and were the main sources of plant protein.”

ISEO recommends the DGAC consider nutrient density and the benefits of processing when considering its recommendations. ISEO notes that there is currently no widely available and accepted definition of ultra-processed.

#### ***ISEO discourages DGAC recommendations on “ultra-processed” based on NOVA***

Furthermore, we are concerned with potential consideration of the NOVA Food Classification System when reviewing evidence on the “ultra-processed” foods question. NOVA is oversimplistic and does not take into account factors such as nutrient density as many foods which would be considered “ultra-processed” are fortified with critically under-consumed nutrients. Many products which may be considered “processed” or even “ultra-processed” can make positive contributions of key nutrients which may not be available in other parts of the diet or may only be available in other products in small amounts. In fact, NOVA does not consider the nutrient content of a food product. For example, “ultra-processed foods” as described by NOVA Category 4 are not automatically high in fat, salt, sugar, or other food additives. Research has shown that there is ambiguity in how the system is applied to foods and beverages:

- Sadler et al. found that there is not a consistent view on which aspects of a food determine how its level of processing is classified.<sup>1</sup>
- Braesco and colleagues point out the inconsistencies in the NOVA classification system.<sup>2</sup>
- In an invited commentary last year, Mike Gibney highlighted that the lack of consensus on the classification of processed foods may play a role in differences in how studies are assessed, compared, and interpreted related to and between classifications and certain measurements of health.<sup>3</sup>

We strongly discourage any DGAC recommendation on the “ultra-processed” foods question which uses the NOVA system as a key aspect for dietary guidance.

#### ***ISEO recommends a food scientist is appointed to the 2025-2030 DGAC***

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<sup>1</sup> Sadler, C.R., Grassby, T., Hart, K., Raats, M., Sokolović, M., & Timotjevic, L. *Processed food classification: Conceptualisation and challenges. Trends in Food Science & Technology. 2021 Apr; 112: 149-62.*

<sup>2</sup> Braesco, V., Souchon, I., Sauviant, P., Haurogné, T., Maillot, M., Féart, C., & Darmon, N. *Ultra-processed foods: how functional is the NOVA system? Eur J Clin Nutr. 2022 Sept; 76(9): 1245-53.*

<sup>3</sup> Gibney, M. *Ultra-processed foods in public health nutrition: The unanswered questions. Br J Nutr. 2022 Dec 14; 1-4.*

Moreover, no food scientist was appointed to the 2025-2030 DGAC, even though food scientists can provide knowledge of food processing and the development of new food products. ISEO strongly encourages HHS and USDA to identify food scientists and those with food production expertise to present to the DGAC to help inform their understanding of food processing and the importance of food processing for nutrition and food safety.

**Conclusion**

Thank you for the opportunity to submit public comments and for your continued commitment to seeking stakeholder input for the 2025-2030 Dietary Guidelines for Americans process. ISEO looks forward to partaking in this critical process and stands ready to be a resource to you.

Sincerely,

*Kailee Tkacz Buller*

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