



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:

Thank you for the opportunity to submit public comments regarding the Scientific Questions To Be Examined To Support the Development of the Dietary Guidelines for Americans, 2025–2030.

Background

The Institute of Shortening and Edible Oils (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.

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.

DGAs and Positioning on Fats, Oils, and Saturated Fat

The [2020-2025 Dietary Guidelines for Americans](#) (DGA) included the following 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)

ISEO Position on Importance of Fats and Oils

ISEO appreciates that the 2020-2025 DGA acknowledged the importance of oils and essential fatty acids, however ISEO does not support 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.

Proposed Scientific Question on Saturated Fat

The Scientific Questions to be Examined to Support the Development of the Dietary Guidelines for Americans, 2025-2030 proposes the following: “What is the relationship between food sources of saturated fat consumed and risk of cardiovascular disease (CVD)?”

ISEO Feedback on Proposed Question

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, wholegrains, 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?”

In conclusion, the authors identified specific research needs for addressing knowledge gaps that have contributed to the controversies on this topic. These are essential factors that should be taken into consideration when finalizing the scientific question on saturated fat and risk of CVD.

Possible Scientific Question Ultra-Processed

The *Scientific Questions to be Examined to Support the Development of the Dietary Guidelines for Americans, 2025-2030* proposes the following: “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 Feedback on Proposed Question

- Given the current lack of a consensus, science-based definition for “processed” or “ultra-processed,” it is unclear how HHS and the U.S. Department of Agriculture (USDA) would intend to proceed with this question and believe it is beyond the scope of the Committee to define “processed” or “ultra-processed”.
- In the event the Committee proceeds to include a question on “ultra-processed” we urge that there also be consideration of nutrient density or nutrient delivery of “processed” foods.
- We strongly recommend that if the 2025-2030 DGA includes a question on “ultra-processed” foods, that there be at least one food scientist on the Committee with robust understanding of how food is manufactured.

ISEO Position on Processed Foods

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. 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 points above in their own science-based nutrition guidance publications, including in its 2008 Expert Consultation on Fats and Fatty Acids in Human Nutrition.

Furthermore, classification systems such as the NOVA Food Classification System are oversimplistic and do 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. 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 and recognize that all NOVA Food Classification System categories can contribute into a nutritionally adequate diet.

This is further 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”.

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

Kailee Tkacz Buller
President & CEO
Institute of Shortening and Edible Oils
www.iseo.org