



## Consumer Federation of America

April 25, 2022

Rachel L. Levine,  
Assistant Secretary for Health  
U.S. Public Health Service

**RE: Proposed Scientific Questions to Inform the 2025-2030 *Dietary Guidelines for Americans***

*SUBMITTED VIA REGULATIONS.GOV*

Dear Assistant Secretary Levine:

The Consumer Federation of America (CFA) appreciates the opportunity to submit these comments on HHS and USDA's proposed scientific questions to inform the next (2025-2030) edition of the *Dietary Guidelines for Americans*. CFA is an association of over 250 non-profit consumer organizations that was established in 1968 to advance the consumer interest through research, advocacy and education. Member organizations include local, state, and national consumer advocacy groups, senior citizen associations, consumer cooperatives, trade unions and food safety organizations. We write to express our support for many of the new questions, to suggest some additions to the proposed topics, and to express our concern with the Departments' decision to address the topics of alcohol and sustainability in separate processes.

### Introduction

More than ever, consumers in the U.S. need scientifically sound, impartial advice on what to eat and drink. Consumers now spend hundreds of billions of dollars—more than a trillion dollars according to some estimates<sup>1</sup>—treating diet-related disease. The COVID-19 pandemic appears to have exacerbated this economic burden. Studies suggest that 63.5% of COVID-19 hospitalizations in the U.S. may be linked to diet-related disease.<sup>2</sup> Indeed, researchers have found that COVID-19 mortality risk is 10 times higher in countries where most of the population is overweight, as compared to countries where less than half of adults are overweight.<sup>3</sup> Unfortunately, the U.S. falls far within the “more than half” overweight category. According to the latest data out of the Centers for Disease Control and Prevention (CDC), 73.6% of adults aged 20 and over are overweight; 42.5% are obese.<sup>4</sup> Most troubling, obesity rates appear only to be climbing higher.<sup>5</sup>

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<sup>1</sup> <https://earthjustice.org/blog/2016-august/the-hidden-costs-of-food>

<sup>2</sup> [Coronavirus Disease 2019 Hospitalizations Attributable to Cardiometabolic Conditions in the United States: A Comparative Risk Assessment Analysis | Journal of the American Heart Association \(ahajournals.org\)](#)

<sup>3</sup> [COVID-19-and-Obesity-The-2021-Atlas.pdf \(worldobesityday.org\)](#)

<sup>4</sup> <https://www.cdc.gov/nchs/fastats/obesity-overweight.htm>

<sup>5</sup> <https://www.niddk.nih.gov/health-information/health-statistics/overweight-obesity>

### Ultra-processed foods

The historically unprecedented nature of the obesity epidemic suggests that some novel agent is playing an important role in its cause. Ultra-processed foods have attracted increasing suspicion. Numerous epidemiological studies have established a strong association between consumption of ultra-processed foods and obesity, hypertension, cardiovascular disease, type-2 diabetes, cancer, and all-cause mortality risk.<sup>6</sup> Association does not prove causation, however, rigorously controlled experiments have demonstrated that eating ultra-processed food induces overconsumption that leads to weight gain.<sup>7</sup> Ultra-processed foods also often contain artificial food dyes, preservatives, flavorings, and other ingredients that may contribute to obesity and diet-related disease in less direct ways.<sup>8</sup> Whatever the specific mechanism, the mounting evidence linking ultra-processed foods consumption and diet-related disease supports a focus on these foods in the next *Dietary Guidelines*.

### Weight loss and maintenance

We also agree that the *Dietary Guidelines* should consider the impact of various dietary factors on “weight loss and maintenance.” Tragically, as the CDC estimates above make clear, the need for “weight loss and maintenance” now applies to the typical U.S. consumer. The weight loss industry is immense—estimated to be worth more than \$254 billion globally as of 2021.<sup>9</sup> Yet many consumers lack a basic understanding of the factors influencing sustained weight loss, and in particular, overestimate the importance of short-term dietary strategies. Recent studies indicate that recovering from obesity represents a long-term, and sometimes even lifelong, struggle.<sup>10</sup> By expanding its focus to include “weight loss and maintenance,” the *Dietary Guidelines* can help to identify scientifically sound principles that should guide consumers in their weight loss and maintenance strategies, and cut through some of the “hype” around fad diets and specialty food products pushed by the weight loss industry. Ironically, many of these specialty food products, such as meal replacement shakes and powders, are themselves ultra-processed foods, and the proposed research should help to shed light on their efficacy, or lack thereof.

### Added sugars, beverages, and saturated fat

Research on the health impacts of beverage and added sugar consumption will also likely provide helpful information to consumers, as will research on the impact of saturated fat consumption on cardiovascular disease. The comparatively narrow scope of inquiry related to saturated fat, however, raises concerns that the *Dietary Guidelines* will miss an important opportunity to clarify the relationship between meat consumption and mortality risks other than cardiovascular disease, such as

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<sup>6</sup> See, e.g. Matos RA, Adams M, Sabaté J. Review: The Consumption of Ultra-Processed Foods and Non-communicable Diseases in Latin America. *Front Nutr.* 2021;8:622714. Published 2021 Mar 24. doi:10.3389/fnut.2021.622714

<sup>7</sup> See Kevin Hall. [Ultra-Processed Diets Cause Excess Calorie Intake and Weight Gain: An Inpatient Randomized Controlled Trial of Ad Libitum Food Intake \(cell.com\)](#)

<sup>8</sup> See, e.g., de Araujo IE, Schatzker M, Small DM. Rethinking Food Reward. *Annu Rev Psychol.* 2020 Jan 4;71:139-164. doi: 10.1146/annurev-psych-122216-011643. Epub 2019 Sep 27. PMID: 31561741.

<sup>9</sup> <https://www.prnewswire.com/news-releases/global-weight-loss-products-and-services-market-report-2021-the-business-of-weight-loss-in-the-20th-and-21st-centuries-301354957.html>

<sup>10</sup> <https://onlinelibrary.wiley.com/doi/10.1002/oby.21538> (studying 14 “Biggest Loser” contestants 6 years after their weight loss, finding “those with greater long-term weight loss also had greater ongoing metabolic slowing,” and concluding that “long-term weight loss requires vigilant combat against persistent metabolic adaptation that acts to proportionally counter ongoing efforts to reduce body weight.”).

type 2 diabetes<sup>11</sup> and cancer.<sup>12</sup> The Departments should consider expanding the proposed question related to saturated fat.

### Artificial sweeteners

The Departments should also investigate the effect of artificial sweeteners on “growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance” and “risk of type 2 diabetes.” According to recent estimates, approximately 25% of U.S. children and over 41% of U.S. adults consume artificial sweeteners, a dramatic rise in consumption from just a few years before.<sup>13</sup> Emerging evidence suggests that some artificial sweeteners may induce gut microbiota dysbiosis, leading to chronic inflammation and insulin resistance, among other maladies.<sup>14</sup> One study examining the effects of sucralose consumption indicates that the sweetener “rapidly impairs glucose metabolism.”<sup>15</sup> This research raises important concerns, but many consumers, seeking to avoid added sugars, view artificial sweeteners as the lesser of the two evils. The Departments should not neglect to investigate artificial sweeteners and present a comprehensive picture to consumers seeking to satisfy a sweet tooth.

### Separate processes for alcohol and sustainability

Finally, CFA commends the Departments for committing to address the topics of alcoholic beverages and sustainability. However, we question whether an alternative process will sufficiently elevate these issues to the prominence consumers deserve. As CFA has pointed out, past *Dietary Guidelines* have helped to advance an inaccurate portrayal of moderate alcoholic consumption as salutary, and indeed, the most recent *Dietary Guidelines* continue to include a two-drink recommended limit for men that is at odds with the last expert committee’s report.<sup>16</sup> Does relegating alcohol to a separate process signify that this unfounded advice will remain forever frozen within the *Dietary Guidelines*?

The Departments should take deliberate steps to integrate the results of any parallel processes into the *Dietary Guidelines*. While alcohol is not a nutrient, many consumers derive a significant number of calories from alcoholic beverages. Similarly, while a diet’s sustainability may seem far attenuated

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<sup>11</sup> See, e.g., Aune D, Ursin G, Veierød MB. Meat consumption and the risk of type 2 diabetes: a systematic review and meta-analysis of cohort studies. *Diabetologia*. 2009 Nov;52(11):2277-87. doi: 10.1007/s00125-009-1481-x. Epub 2009 Aug 7. PMID: 19662376. <https://pubmed.ncbi.nlm.nih.gov/19662376/> (“These results suggest that meat consumption increases the risk of type 2 diabetes.”)

<sup>12</sup> See, e.g. Lippi G, Mattiuzzi C, Cervellin G. Meat consumption and cancer risk: a critical review of published meta-analyses. *Crit Rev Oncol Hematol*. 2016 Jan;97:1-14. doi: 10.1016/j.critrevonc.2015.11.008. Epub 2015 Nov 17. PMID: 26633248. <https://pubmed.ncbi.nlm.nih.gov/26633248/> (“Our analysis suggest increased risk of cancer in subjects consuming large amounts of red and processed meat, but not in those with high intake of white meat or poultry.”).

<sup>13</sup> See Pang MD, Goossens GH, Blaak EE. The Impact of Artificial Sweeteners on Body Weight Control and Glucose Homeostasis. *Front Nutr*. 2021;7:598340. Published 2021 Jan 7. doi:10.3389/fnut.2020.598340. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7817779/>

<sup>14</sup> *Id.*

<sup>15</sup> Dalenberg JR, Patel BP, Denis R, Veldhuizen MG, Nakamura Y, Vinke PC, Luquet S, Small DM. Short-Term Consumption of Sucralose with, but Not without, Carbohydrate Impairs Neural and Metabolic Sensitivity to Sugar in Humans. *Cell Metab*. 2020 Mar 3;31(3):493-502.e7. doi: 10.1016/j.cmet.2020.01.014. PMID: 32130881; PMCID: PMC7784207. <https://pubmed.ncbi.nlm.nih.gov/32130881/>

<sup>16</sup> See, <https://consumerfed.org/testimonial/cfa-asks-trump-administration-to-follow-expert-committees-recommendations-on-alcohol-in-new-dietary-guidelines-for-americans/>

from “advice on what to eat and drink to meet nutrient needs, promote health, and prevent disease,”<sup>17</sup> ignoring sustainability threatens to exacerbate food insecurity, and associated problems of diet-related disease, including obesity.<sup>18</sup>

### Conclusion

The typical U.S. consumer faces a deluge of often conflicting advice about what to eat. Some nutrition controversies will surely continue to evade any definitive resolution for years or even generations to come, but right now, public health authorities can say with certainty that most consumers are not eating well. As long as the obesity and diet-related disease epidemics continue to ravage public health, the *Dietary Guidelines* will remain a critical opportunity to inform consumers. The proposed questions are a good start towards making the most of that opportunity, and the recommendations herein aim to further advance the impact of the next *Dietary Guidelines*.

Thank you for your consideration of these comments.

Sincerely,

Thomas Gremillion  
Director of Food Policy  
Consumer Federation of America

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<sup>17</sup> <https://www.dietaryguidelines.gov/about-dietary-guidelines/purpose-dietary-guidelines>

<sup>18</sup> Pan L, Sherry B, Njai R, Blanck HM. Food insecurity is associated with obesity among US adults in 12 states. *J Acad Nutr Diet*. 2012;112(9):1403-1409. doi:10.1016/j.jand.2012.06.011.  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4584410/>