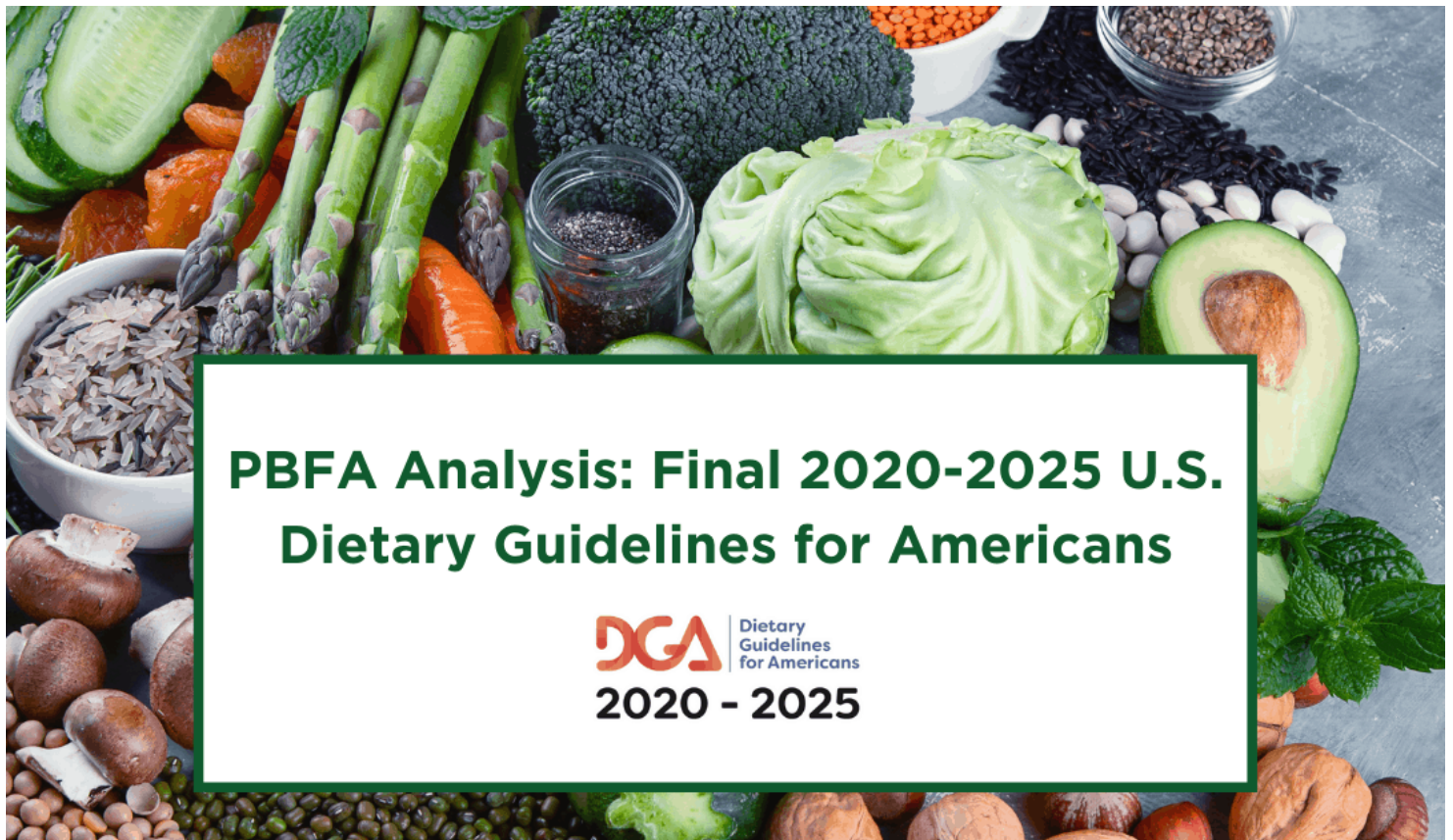


PBFA Analysis: Final 2020-2025 U.S. Dietary Guidelines for Americans

by [Sahra Pak](#) | Jan 27, 2021 | [Nutrition](#), [PBFA News](#), [Policy](#) | [0 comments](#)



By: Sahra Pak, MS, RD, CPT, DipACLM

The U.S. Department of Agriculture (USDA) and the Department of Health and Human Services (HHS) released the new [2020-2025 U.S. Dietary Guidelines for Americans \(DGA\)](#) just before the new year. The U.S. DGA plays a pivotal role for many industries such as our plant-based food company partners and members. Inclusion of plant-based food options in the DGA increases the demand and access to sustainable and healthful

foods and meals for millions of Americans through federal and state-level food and nutrition programs.

In 2020, prior to the release of the final version of the guidelines, PBFA submitted evidence-based recommendations and data driven comments to the Advisory Committee to ensure the inclusion of key recommendations that will better serve all institutions, nutrition programs and the public. The final version of the 2020-2025 DGA included a few of the recommendations made by the Dietary Guidelines Advisory Committee but to our disappointment failed to include other pertinent recommendations.

Successes

Some of the positive changes pertaining to plant based foods from the new U.S. DGA are as follows:

- **The DGA now includes eating pattern recommendations for infants, toddlers, and for women who are pregnant** for the first time since 1985. Although the DGA recommendations are not entirely based on foods that promote health – the inclusion of soy-based yogurt, fortified soy beverage as “good source of calcium and vitamin D” is a welcome addition. (More on dairy in the next section.) Whole grains such as oat, barley, multigrain, and rice cereals as well as plant foods such as vegetables, fruits, beans, peas, and lentils are also recommended for infants and toddlers to consume to meet nutrient needs.
- **A clear and prominent inclusion of “fortified soy alternatives” as part of the dairy food group throughout the DGA.** Although dairy intake is not supported by science and in the U.S., approximately 36% of Americans have lactose malabsorption, the clear indication that soy alternatives are included in this “food group” is a welcome and necessary step towards increasing health supporting foods in our federal food nutrition standards and beyond. Other fortified plant-based milks and plant-based foods can also provide the nutrients of public concern (e.g. calcium and vitamin D) without harming those that may not even realize that they are unable to digest lactose. This inclusive approach would be considerate of other lifestyle choices of Americans such as culture and sustainability.
- **Plant-based milk alternatives (fortified unsweetened soy beverages) included as a suitable beverage choice for toddlers.** Again, although toddlers do not need foods that are “dairy equivalent” in their diet, it is important for the inclusion of plant-based milk alternatives to be present in the DGA. We will continue to advocate for inclusion of health promoting foods such as other plant-based milk alternatives rather than dairy products for Americans of all ages.

- **The *Legumes* category has been updated to the “Beans, peas, and lentils” group**, which may help more consumers easily identify what the “legumes” category refers to and includes.
- **A call for consuming nutrient-dense foods to meet nutritional needs without less desirable nutrients such as saturated fat, which is predominantly found in animal-based foods.** The updated DGA states that more than half of Americans do not meet the recommended intake amount for nuts, seeds, and soy products. In addition the guidelines suggest that “replacing processed or high-fat meats with beans, peas, and lentils “could help lower intake of saturated fat and sodium, nutrients that are often consumed in excess recommended limits.” (Page 34, 2020-2025 DGA.)
- **The new guidelines continue to recommend intake of dietary cholesterol to be low** and notes that the National Academies recommends dietary cholesterol consumption to be “as low as possible without compromising the nutritional adequacy of the diet.” (Page 44, 2020-2025 DGA.) This is consistent with the 2015-2020 DGA recommendation for Americans to *consume as little dietary cholesterol as possible* due to strong evidence of reduced risk of cardiovascular diseases (CVD). Plant foods and ingredients do not contain cholesterol, therefore it is essential for healthcare providers, institutions, national nutrition programs to continue to increase plant-based options for all Americans to reduce the risk of CVD and many other diet-related chronic diseases.

Challenges

The new guidelines failed to include the following key points and considerations:

- **The world’s largest dietetics group, the Academy of Nutrition and Dietetics recommended the DGA to consider health equity** when deciding on the final recommendations. The newest DGA however, failed to do so by continuing to include foods that are not regularly consumed nor tolerated by certain segments of the population such as dairy, where approximately 68% of the human population has the reduced ability to digest the carbohydrate (sugar/lactose) in dairy after infancy, and is most prevalent in African Americans, and those of East Asian descent.
- **Recommendation for Americans to consume more seafood.** Particularly the recommendations for pregnant mothers and children to consume seafood which contains various levels of toxic heavy metals and pollutants is unconscionable. In

fact, the DGA warns that if up to 3 ounces of seafood per week is consumed by children that they should be fed *only the type of seafood that contains low methylmercury*. (Page 63, 2020-2025 DGA.) In addition, the DGA cautions that many commonly consumed varieties of seafood should be avoided because *they cannot be consumed at the recommended amount per week (3 ounces) by children* without the “potential of exceeding safe methylmercury limits.” (Page 63, 2020-2025 DGA).

Foods containing toxic chemicals or heavy metals that necessitates the nutrition guideline to include a health warning for the consumer should not be included in the DGA in the first place.* There are a variety of other foods that are safer, healthier, and more sustainable than seafood to obtain nutrients such as omega-3 and omega-6 fatty acids. For example, plant-based sources such as flaxseeds, walnuts, hemp seeds, and certain forms of algae contain the essential fatty acids that deliver the nutrients that keep Americans healthy and well.

- **Failing to include the obvious connection between food production, consumption, and sustainability.** Without our planet – there is no place to produce our food supply. Our national dietary guidelines must recognize our dependence on our planet and stay within the limits of the [planetary boundaries](#) in order for the next generations to not only thrive but to survive.
- **Some of the DGA recommendations for nutrients to avoid and/or increase continue to be confusing and unclear.** For example, the DGA recommends one to “limit foods and beverages higher in saturated fat” and further emphasizes that “a healthy dietary pattern doesn’t have much room for extra saturated fat...” but on the other hand include dairy products (albeit ‘low fat’) and lean meats and poultry as “nutrient dense foods” that should be consumed on a regular basis. The DGA should be clear for healthcare professionals, consumers, policy makers, and industry to interpret particularly when the mission and goal of the DGA is to “promote health and prevent disease.” (Page 2, DGA, 2020-2025.)

Conclusion

In summary, the U.S. Dietary Guidelines (USDA and HHS) recognize that chronic diseases, such as cardiovascular disease, type 2 diabetes, obesity, and some types of cancer are “very prevalent among Americans and post a *major public health problem*” and that these are “diet-related diseases.” As such, **the USDA and HHS must not lose focus on promoting and recommending the most healthful and health-promoting, rather than disease-promoting foods through the DGA.** In the United States, these guidelines determine the federal nutrition policy and education as well as other food purchasing and consuming decisions by the public. If Americans are to

make “Every Bite Count” the federal guidelines must make the *healthy choice the easiest choice* – especially when [more than 60% adults in the U.S. have at least one chronic disease condition, 40% or more have two of more](#). What’s more, chronic diseases are the leading causes of death and disability that drives the nation’s \$3.8 trillion health care costs.

Furthermore, **our national dietary guidelines should be a recommendation that recognizes the undeniable link between our planetary health and our food system**. The DGA Committee had already concluded in 2015 that a diet higher in plant-based foods and lower in animal-based foods not only supports the health of the population but of the environment as well. [According to EAT, if the U.S. DGA was adopted globally, 3.5 Earths would be required to produce the foods recommended in the guideline](#).

Although we do commend the DGA’s My Plate to be predominantly plant-based, our work continues – Center for Nutrition Policy and Promotion (CNPP) have found that the average [Healthy Eating Index \(HEI\) score](#) for Americans is 59 out of 100, indicating that average Americans are not even close to eating what’s being suggested in the dietary guidelines.

We need to create bold and swift changes in our food system through policy changes in order to protect the health of Americans as well as our planet. The shift toward a dietary guideline that not only considers the betterment of the population but of the planet should be a priority for all and we will continue to advocate for policies that recognize data, reality, and urgency of our health and climate crisis.

**It is our goal that all Americans have access to health promoting plant-based food options. However, for those Americans or communities that rely on seafood for sustenance for cultural or accessibility reasons – we urge not so much the individual to change or choose the most healthiest and nourishing foods but call for our government and policy makers to make the nutritious, sustainable, and culturally appropriate foods to be available for all.*

About the author:

PBFA Nutrition Advisor **Sahra Pak, MS, RD, CPT, DipACLM**, is a registered dietitian with a focus on lifestyle medicine, plant-based nutrition, public health, and mindfulness. Sahra has worked in the hospitality, academics, government, healthcare, and tech start-up arenas and has experience in animal welfare advocacy, culinary arts, sustainable food systems, and health and race equity projects. As a dietitian, Sahra brings her varied and extensive experience to improve the health of the population through effective behavior modification strategies, clinical nutrition, and upstream intervention approaches such as implementing sustainable food systems, policy and environmental change, and education programs. Currently, she is a co-creator of a lifestyle medicine

intervention program at the U.S. Air Force that promotes plant-based nutrition and other lifestyle intervention strategies to address the root cause of chronic disease.

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