



**Public Comments to the Departments on the  
Scientific Report of the 2025 Dietary Guidelines Advisory Committee**  
Oral Testimony of Grace Chamberlin, MPH, Policy Associate  
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January 16, 2025

Good afternoon, my name is Grace Chamberlin. Thank you for the opportunity to provide comments on behalf of the Center for Science in the Public Interest, a nonprofit that advocates for evidence-based and community-informed policies on nutrition, food safety and health.

Overall, CSPI urges USDA and HHS to incorporate the 2025 DGAC's evidence-based recommendations into the final 2025-2030 Dietary Guidelines.

Today I will highlight **four** points from our written comment.

First, we strongly support the *Eat Healthy Your Way* dietary pattern recommended by the Committee. Evidence consistently shows multiple health benefits of a diet higher in vegetables, fruits, legumes, nuts, whole grains, and fish, and lower in red and processed meats, sugar-sweetened beverages, sweets, refined grains, and saturated fats.<sup>1</sup> Additionally, maintaining and clearly communicating the Committee's recommended quantitative limits on saturated fat, added sugar, and sodium is vital.<sup>2</sup> These limits inform nutrition labels and federal food assistance programs that serve 1 in 4 Americans.<sup>3,4</sup>

Second, we support the Committee's recommended changes to the Protein category, emphasizing intake of beans, peas, and lentils and reduced intake of red and processed meats.<sup>5</sup> To ensure federal programs like school meals realize the intended health benefits of this change, the Guidelines and related rulemaking should clearly emphasize increasing

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<sup>1</sup> 2025 Dietary Guidelines Advisory Committee. 2024. *Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture*; Part E. Chapter 1, p. 3. U.S. Department of Health and Human Services. <https://doi.org/10.52570/DGAC2025>

<sup>2</sup> 2025 Dietary Guidelines Advisory Committee. 2024. *Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture*; Part E. Chapter 1, pp. 17-18. U.S. Department of Health and Human Services. <https://doi.org/10.52570/DGAC2025>

<sup>3</sup> USDA Food and Nutrition Service. *About FNS*. <https://www.fns.usda.gov/about-fns>. Updated December 20, 2024. Accessed December 27, 2024.

<sup>4</sup> 2025 Dietary Guidelines Advisory Committee. 2024. *Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture*; Part B. Ch.1, p. 4. U.S. Department of Health and Human Services. <https://doi.org/10.52570/DGAC2025>

<sup>5</sup> 2025 Dietary Guidelines Advisory Committee. 2024. *Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture*; Part E. Chapter 1, p. 4. U.S. Department of Health and Human Services. <https://doi.org/10.52570/DGAC2025>

plant-based proteins while maintaining intake of other vegetables and reducing red and processed meat consumption.

Third, we acknowledge that the Committee's findings on ultra-processed foods were limited by the current available evidence, and we support the Committee's call for more research.<sup>6</sup> Increased funding for this research is also crucial. We recommend highlighting how current Guidelines already promote minimally processed foods like whole fruit and discourage ultra-processed foods with strong evidence of harm, like sugar-sweetened beverages and processed meats.

Lastly, the transparency of this process is critical for building public trust. We urge the Departments to publicly disclose detailed, science-based justifications for any Committee recommendations omitted or altered in the final Guidelines. We also recommend that future DGACs disclose all relevant conflicts of interest for individual committee members.

Thank you.

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<sup>6</sup> 2025 Dietary Guidelines Advisory Committee. 2024. *Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture*; Part D. Chapter 2, pp. 18-19, 26. U.S. Department of Health and Human Services. <https://doi.org/10.52570/DGAC2025>