International Food Information Council Public Comments to the Scientific Report of the 2020 Dietary Guidelines Advisory Committee

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RE: IFIC Public Comments to the Scientific Report of the 2020 Dietary Guidelines Advisory Committee [Docket FNS-2020-0015]

The International Food Information Council (IFIC) appreciates the opportunity to submit public comments to the U.S. Department of Agriculture (USDA) and the Department of Health and Human Services (HHS) regarding the Scientific Report of the 2020 Dietary Guidelines Advisory Committee (DGAC).

IFIC is a §501(c)(3) nonprofit educational organization with a mission to effectively communicate science-based information about health, nutrition and food safety and agriculture. One of IFIC's objectives is to elevate the understanding of Americans' eating habits through its consumer research. IFIC has been exploring Americans' attitudes toward nutrition and health for three decades and views consumer research as a critical first step in determining Americans' understanding of nutrition information and examining how consumer knowledge, perceptions and attitudes can impact behavior. IFIC's signature research effort is its annual *Food & Health Survey*, an online survey of over 1,000 Americans ages 18 to 80, now in its 15th year. IFIC also has a robust consumer research program that offers frequent insights on a wide range of topics.

The *2020-2025 Dietary Guidelines for Americans* (DGA) represent an important opportunity to increase consumers' nutrition knowledge and confidence in their ability to tailor their dietary patterns to improve or maintain health. With a new emphasis on life stage – including for the first time an examination of dietary patterns and recommendations for infants and children under 2 years of age – this iteration is poised to bring evidence-based nutrition guidance to even more Americans.

IFIC also wants to stress that in order to transform information into motivation, it is essential that nutrition science be communicated in practical, action-oriented messages that make adopting healthful behaviors accessible, affordable and doable for all segments of the population regardless of culture, income, age or gender. At present, the country is in the midst of a devastating pandemic, the consequences of which have laid bare a host of social inequities that have gone unresolved for too long – many of which relate directly to a person's ability to adopt dietary recommendations and improve or

maintain their health. These disadvantages often lead to increased incidence and prevalence of diet-related diseases such as diabetes, hypertension and obesity, which put people at higher risk of serious outcomes from COVID-19. Now more than ever, it is crucial – even life or death – that the messages within the *2020-2025 DGA* reach the people who stand to benefit the most from their adoption.

IFIC's consumer research underscores the need for credible, actionable, evidence-based nutrition education efforts that can help consumers navigate questions about dietary patterns and their relationship to health outcomes. In doing so, it is also critical to better identify consumers' knowledge gaps, their dietary motivations and strategies, where consumers seek information and the appropriate channels through which science-based recommendations get shared. In the following comments, IFIC has identified potential communications challenges and opportunities within the Scientific Report of the 2020 DGAC that require careful consideration by the Federal agencies before publishing the *2020-2025 DGA* and when communicating the recommendations to the American public.

Thank you for the opportunity to provide comments, and for focusing on transparency, inclusivity and a science-driven approach throughout the *2020-2025 DGA* process.

Sincerely,

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FAMILIARITY WITH THE DIETARY GUIDELINES FOR AMERICANS AND MYPLATE

The DGA are an important source of information on what and how Americans should eat to promote health and prevent chronic disease. They form the basis of Federal nutrition policies and programs; support nutrition education efforts; guide local, state and national health promotion and disease prevention initiatives; and inform various organizations and industries. Providing Americans with nutrition guidelines based on the best available scientific evidence can educate and empower them to make healthy decisions for themselves and their families. However, knowledge cannot be gained and put into action if the information does not reach the public.

As such, understanding the level of consumer familiarity with the current iteration of the DGA and its accompanying educational resources is an important step in determining how to improve adherence and implementation of the *2020-2025 DGA*. Data from IFIC's *2020 Food & Health Survey*[1] shows promise: familiarity and knowledge about the DGA has increased significantly since 2010. This year, 41% of surveyed consumers reported knowing at least a fair amount about the DGA, up from 23% in 2010. And yet, there is room for improvement. Forty-six percent reported having heard of the DGA but knowing very little about them and 14% reported never having heard about them. Further, there is a significant gap in DGA awareness in specific subgroups, particularly self-reported health status and education level. Forty-nine percent of people who report being in excellent/very good health and 47% of people with a college degree said that they know at least a fair amount about the DGA, compared to just 29% who report being in poor health and 37% with less than a college degree.

The same survey also showed that familiarity and knowledge about MyPlate have increased in the past year, with 45% saying they know a lot or a fair amount about the graphic, compared to 38% in 2019. Younger consumers, parents, those with a lower body mass index (BMI) and those who reported being in good health were more likely to know about the graphic. Here again, however, there are large proportions of Americans who lack awareness of the MyPlate graphic: over one-third of consumers (34%) reported never seeing it before and 17% said that they had seen it but know very little about it.

While it is encouraging that familiarity and knowledge of the DGA and its education initiatives have increased, IFIC's consumer research exposes gaps in awareness and understanding in groups that could significantly benefit from learning about and implementing DGA recommendations. These findings highlight an opportunity for heightened communications among these subgroups about the content and applications of the DGA.

Key Points

1. Familiarity and knowledge about the DGA and MyPlate have increased compared to 2010 and 2019, respectively.
2. There is wide disparity in the level of familiarity and knowledge among population subgroups, including self-reported health status, education level, age, BMI and parental status. This highlights an opportunity for focused communications that target specific subgroups.

[1] International Food Information Council. *2020 Food & Health Survey*. 10 June 2020. https://foodinsight.org/2020-food-and-health-survey/

HEALTHY DIETARY PATTERNS

IFIC is focused on helping Americans make informed choices that lead to a healthful and balanced lifestyle. When too much emphasis is placed on single foods, nutrients or ingredients, the importance of eating an overall balanced diet often gets overlooked. For this reason, IFIC supports the emphasis on healthy eating patterns in the 2020 DGAC report and the recommendation for continued inclusion of the USDA Food Patterns in the *2020-2025 DGA*.

The three current USDA Food Patterns (Healthy U.S.-Style, Healthy Vegetarian and Healthy Mediterranean-Style) are characterized by higher consumption of vegetables, fruits, whole grains, low-fat dairy and seafood; lower consumption of red and processed meat; and lower intakes of refined grains and sugar-sweetened foods and beverages. Strengths of the healthy dietary pattern approach include the interactive relationships between foods to promote health and lower disease risk, their application across life stages and their flexibility for applying individual and cultural considerations to dietary choices. However, the DGAC report acknowledges that in the U.S., dietary intakes have never aligned with recommendations. Indeed, IFIC's *2020 Food & Health Survey*[1] notes a discrepancy between perceived healthfulness of certain foods and food components and actual consumption patterns. For example, while consumers overwhelmingly think that fiber (82%) and whole grains (79%) are healthy, just 54% report trying to consume fiber and 50% say they are trying to consume whole grains. Americans fall short on meeting intake recommendations for both, which is illustrative of other divergences between beliefs and actions around food choices. Often, messages about *which* foods are healthy are being internalized. However, it is clear that in order for eating behaviors to change, Americans need to better understand *why* consuming these foods is important and *how* to incorporate them into their diets.

Communications efforts related to healthy dietary patterns will also be essential for breaking through the noise of fad diets and popular trends. The *2020 Food & Health Survey*[1] found that 43% of consumers have followed a diet in the past year, an increase from 38% in 2019. The most popular diets included intermittent fasting, clean eating and diets that emphasize certain macronutrient restrictions (such as ketogenic or high-fat and low-carb diets). These latter choices stand in stark contrast to the conclusions drawn from the 2020 DGAC, which largely found that there was insufficient evidence of any connection between diets based on macronutrient distribution and risk for diet-related health conditions. In contrast, eating patterns backed by considerable research, like the Mediterranean, vegetarian and DASH diets, were not as commonly followed. While more research is needed on macronutrient distribution-based diets, current communications emphases should be placed on dietary patterns that have clear, science-based evidence of health benefits.

These are key communications challenges and opportunities for the *2020-2025 DGA*, keeping in mind that purchasing drivers like taste and price are consistently prioritized over healthfulness by consumers,[1] with convenience following close behind. If the DGA are to be taken up by more Americans, this iteration should focus on showcasing ways to consume healthy foods that take these other factors into account. Examples could include highlighting the price and convenience advantages of canned and frozen vegetables and fruits and demonstrating how to prepare plant-based sources of protein and seafood in culturally relevant ways. Other options could include focusing on the concept of "simple swaps," in which small changes in food choice or preparation techniques for commonly consumed foods and meals could increase consumption of underconsumed food components (e.g., calcium, fiber, potassium and vitamin D) and nutrients and decrease intakes of added sugars, saturated fats and sodium. As stated in the DGAC report, leveraging usual intake patterns to improve diet quality could optimize acceptance of a shift to food and beverage choices with a higher nutrient-to-energy ratio.

[1] International Food Information Council. *2020 Food & Health Survey*. 10 June 2020. https://foodinsight.org/2020-food-and-health-survey/

Key Points

1. IFIC supports the emphasis on healthy eating patterns in the 2020 DGAC report and the recommendation for continued inclusion of the USDA Food Patterns in the *2020-2025 DGA*.
2. There are discrepancies between perceived healthfulness of foods and food components and consumption patterns (e.g., fiber and whole grains). Similarly, there is a gap between the types of diets Americans are choosing to adopt and those that have a strong evidence base behind them.
3. Communications efforts of the DGA should focus on helping people understand why making healthy choices can directly impact their health while offering approachable advice on how to shift toward healthy dietary patterns.

BIRTH TO 24 MONTHS LIFE STAGE: INTRODUCING COMPLEMENTARY FOODS

The inclusion of infants and children under 2 years of age within the *2020-2025 DGA* is an important and challenging effort. While the conclusions of the 2020 DGAC made clear that more research is needed on the nutritional needs of this youngest age group, the recommendations that have been put forth in this iteration of the DGA will be important guidance for parents and caregivers at this influential developmental stage.

The transition to complementary foods is both an exciting and anxious time for parents and caregivers. IFIC research conducted in 2018[1] found that while parents of children under 24 months of age are confident that they are feeding them an age-appropriate and nutritious diet, they had several common concerns. These included choking hazards (55%), the potential for allergenic reactions (38%), when to introduce foods (24%) and what foods to introduce (21%). Though these parents claimed to be satisfied with the sources of information available to them, nearly half (45%) said that not knowing where to find reliable advice was at least a minor concern.

When asked about their primary sources of information on healthy eating and nutrition for their young children, pediatricians were cited by 77% of parents, followed by advice from their mother or mother-in-law (32%), other family members (30%) and online publications (30%). Those outside of the immediate family also play prominent roles in a child's diet: 79% of parents said that a child-care provider has at least some impact on their child's diet. These findings speak to the need to ensure that nutrition messages are communicated to everyone providing care, and that educational opportunities and evidence-based resources are readily available to everyone.

Parents and caregivers play crucial roles in building acceptance and preferences for healthy dietary patterns by serving as gatekeepers for food entry into the home and by modeling eating behaviors. Therefore, motivation to provide nutritious foods for and build healthy habits in infants and young children is intimately connected to the purchasing and eating decisions of those who care for them. IFIC encourages an emphasis on this connection in communications efforts and outreach for the *2020-2025 DGA*.

The DGAC report highlights many specific food components that may pose public health challenges at different stages of infancy and toddlerhood, including potassium, vitamin D, choline, iron, zinc and linoleic acid. Evidence included in the report also indicates that large increases in added sugars and solid and saturated fats are observed between the ages of 12 to 24 months. The report emphasizes that nutrient and overall dietary goals could be more readily achieved in this age group by including fruits, vegetables, yogurt, eggs, legumes, nuts, seeds and meats in an age-appropriate presentation. Recommendations put forth in the DGA and in translational communications materials should provide age-appropriate examples of foods belonging to each of these categories, including culturally diverse options and taking into account potential challenges, such as meeting nutrient needs while managing food allergies.

Finally, as noted by the DGAC, *how* infants and toddlers are fed, not just *what* they are fed, can be of critical importance with regard to building healthy eating habits and influencing health outcomes throughout life. Although questions related to "how to feed" were not among the topics examined by this DGAC, IFIC encourages the Federal agencies to offer opportunities to highlight other evidence-based

[1] International Food Information Council. *Attitudes and Habits of Early Childhood Parents*. 20 September 2018. https://foodinsight.org/parents-uncertain-about-times-of-childrens-dietary-transitions-gap-exists-between-expectations-and-reality/

resources on this issue, including a recent report published by the National Academies of Science, Engineering and Medicine.[2]

Key Points

1. Introducing complementary foods is an exciting but uncertain time for many parents and caregivers. While most are focused on feeding infants and young children a nutritious diet, there are concerns and uncertainties related to what and how to feed them and where to turn for reliable advice.
2. Pediatricians and family members are top sources of information for many parents; child-care providers also have an impact on the diets of infants and young children. This highlights the need for diverse communications materials and resources available to foster consistent messaging on complementary feeding.

[2] National Academies of Science, Engineering and Medicine. *Feeding Infants and Children from Birth to 24 Months: Summarizing Existing Guidance.* Washington, DC: The National Academies Press;2020.

BIRTH TO 24 MONTHS LIFE STAGE: INTRODUCING ALLERGENS

Historically, preventing food allergies in high-risk infants has focused on allergen avoidance and delayed introduction of potentially allergenic foods. However, with new, high-quality evidence available, the expert guidance has shifted in recent years. Introducing peanuts in the first year of life as an approach to prevent peanut allergy is now endorsed by the American Academy of Pediatrics (AAP), among other professional and medical organizations.[1] These recent updates are reflected in the 2020 DGAC report. However, the report notes that implementation of this guidance has been challenging.[2]

IFIC consumer research underscores the confusion around young children and allergies. The *2019 Food & Health Survey*[3] found that more than one-third (37%) of parents with children under age nine believed that the appropriate time to introduce peanuts is when an infant turns one year old. Sixteen percent said that infants should not be exposed to peanuts and 17% said they did not know. Just 30% correctly responded that peanuts should be introduced at the same time other solid foods are introduced (the approach that is recommended by the AAP). The knowledge gap about current guidelines widened when comparing parents of differing income levels: 57% of parents making less than $35,000 per year incorrectly believed that infants should be exposed when they turn one year old, compared to 28% of parents with an income at or above $75,000 per year. More broadly, IFIC research has found that among parents of children under the age of two, there is a high level of concern about the potential for allergies and allergic reactions when transitioning to solid foods.[4]

The 2020 DGAC also expands recommendations for early allergen introduction to eggs, commenting that "[i]ntroducing a variety of foods at this time that fit a pattern consistent with good health, prepared in a safe-for-age way, has the potential to favorably influence food preferences and health outcomes." To do so, IFIC encourages the *2020-2025 DGA* to provide clear, consistent allergen recommendations that can be translated into appropriate dissemination formats for families, caregivers, new parents and health professionals in pediatric settings. This may include registered dietitians, nurse practitioners, physician assistants and others.

Key Points

1. There is confusion and uncertainty surrounding the updated guidance on peanut introduction for allergy risk reduction. This knowledge gap is wider among certain population subgroups.
2. The *2020-2025 DGA* should provide clear, consistent allergen recommendations that can be translated into multiple formats for a variety of audiences.

[1] Sicherer SH, Sampson HA, Eichenfield LF, Rotrosen D. The benefits of new guidelines to prevent peanut allergy. *Pediatrics*. 2017;139(6). doi:10.1542/peds.2016-4293.
[2] Mikhail I, Prince BT, Stukus DR. Update on early introduction of peanut to prevent allergy development: challenges with implementation. *Curr Allergy Asthma Rep*. 2019;19(11):51. doi:10.1007/s11882-019-0884-0.
[3] International Food Information Council. *2019 Food & Health Survey*. 22 May 2019. https://foodinsight.org/2019-food-and-health-survey/
[4] International Food Information Council. *Attitudes and Habits of Early Childhood Parents*. 20 September 2018. https://foodinsight.org/parents-uncertain-about-times-of-childrens-dietary-transitions-gap-exists-between-expectations-and-reality/

ADDED SUGARS AND LOW- AND NO-CALORIE SWEETENERS

The *2015-2020 DGA* recommended that people consume less than 10% of total daily calories from added sugars,[1] a number that the average American still exceeds despite steady reduction of added sugars intake during the last two decades.[2] The 2020 DGAC concluded that the recommendation for added sugars be further reduced to less than 6% of total calories, a change that will undoubtedly catch the attention of the American public and present considerable challenges to achieving. If this goal is to be met as part of a diet that aligns with all other elements of the *2020-2025 DGA*, it is critical that this new recommendation for reducing added sugars consumption is paired with practical, science-based advice that helps Americans focus on eating healthier and more nutrient-dense dietary patterns overall.

Consistent with the observed gradual decline in added sugars intake, IFIC research demonstrates that many Americans are already employing sugar-reduction strategies. The *2019 Food & Health Survey*[3] found that the most cited dietary change in the last decade was limiting sugar intake, and *2020 Food & Health Survey*[4] found that 74% of respondents are trying to limit (61%) or avoid (13%) sugars in their diet. The top action cited by those who report limiting or avoiding sugars in their diet is drinking water instead of caloric beverages (60%), an approach that is directed toward lowering consumption of sweetened beverages (the top food category source of added sugars for Americans ages two years and older).

Strategies for reducing sugar intake also include using low-calorie sweeteners instead of adding sugar (25%), purchasing sugar-free options when they are available (21%) and switching from full-calorie beverages to low- and no-calorie options (19%).[4] The 2020 DGAC reference global health authorities such as the World Health Organization, European Food Safety Authority and the U.S. Food and Drug Administration when it states that "multiple national regulatory bodies agree that LNCS [low- and no-calorie sweeteners] can be used safely." The 2020 DGAC also recommend that LNCS be considered as an option for managing body weight. With overweight and obesity remaining highly prevalent and a pressing public health challenge, the *2020-2025 DGA* present a significant opportunity to reassure Americans of the safety of low- and no-calorie sweetener options, their ability to help reduce consumption of calories from added sugars and the positive contributions they can make to body weight management.[5,6] While not within the scope of the 2020 DGAC, IFIC encourages future DGACs to include analyses of the effects of LNCS on blood glucose levels[7] and risk for type 2 diabetes. Obesity and type 2 diabetes are widespread and interconnected health conditions impacting millions of Americans, and it is critical that future DGACs assess dually beneficial prevention strategies, including the use of LNCS.

Finally, continuing to promote food label literacy is another important aspect in the effort to reduce added sugar intake. Just 27% of those trying to limit or avoid sugars in their diet report using the Nutrition Facts

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[1] U.S. Department of Health and Human Services and U.S. Department of Agriculture. *2015 – 2020 Dietary Guidelines for Americans*. 8th Edition. December 2015. Available at https://health.gov/our-work/food-and-nutrition/2015-2020-dietary-guidelines/.
[2] Bailey RL, Fulgoni VL, Cowan AE, Gaine PC. Sources of Added Sugars in Young Children, Adolescents, and Adults with Low and High Intakes of Added Sugars. *Nutrients*. 2018;10(1):102. Published 2018 Jan 17. doi:10.3390/nu10010102
[3] International Food Information Council. *2019 Food & Health Survey*. 22 May 2019. https://foodinsight.org/2019-food-and-health-survey/
[4] International Food Information Council. *2020 Food & Health Survey*. 10 June 2020. https://foodinsight.org/2020-food-and-health-survey/
[5] Laviada-Molina H, Molina-Segui F, Pérez-Gaxiola G, et al. Effects of nonnutritive sweeteners on body weight and BMI in diverse clinical contexts: Systematic review and meta-analysis. *Obes Rev*. 2020;21(7):e13020. doi:10.1111/obr.13020
[6] Rogers PJ. Does low-energy sweetener consumption affect energy intake and body weight? A systematic review, including metaanalyses, of the evidence from human and animal studies. *Int J Obes*. 2016 Mar 40(3):381-94.
[7] Nichol AD, Holle MJ, An R. Glycemic impact of non-nutritive sweeteners: a systematic review and meta-analysis of randomized controlled trials. *Eur J Clin Nutr*. 2018 May 15.

label to choose products with less total sugars, and only 23% refer to the label to choose products lower in added sugars.[4]

Key Points

1. An updated recommendation to reduce added sugars consumption should be paired with practical advice that helps Americans focus on eating healthier and more nutrient-dense dietary patterns.
2. Additional education and communications about existing tools could assist Americans in their efforts to continue reducing calories from added sugars. Two examples include reassurance of the safety of low- and no-calorie sweetener options and increased usage of the Nutrition Facts label.

FREQUENCY OF EATING: SNACKING

The 2020 DGAC report highlights that snacking is extremely common, with 93% of the U.S. population snacking at least occasionally and two to three snacking events reported on average per day. Additionally, IFIC's *2020 Food & Health Survey*[1] found that nearly two in five (38%) at least occasionally replace meals by snacking. As the country continues to cope with the consequences of COVID-19, snacking may be taking on an even more prominent role: nearly one-third of consumers reported that they have been snacking more because of the pandemic.[1]

These observations, coupled with the fact that, on average, snacks provide nearly a quarter of total calories consumed by Americans, indicate a need to emphasize nutrient-dense snacking options that improve diet quality for every life stage. Snacking poses a practical opportunity to increase intakes of fruits, vegetables, whole grains and other healthful foods, rather than being a common occasion for consumption of foods high in sodium, added sugars and saturated fats, which they are at present. To that end, IFIC agrees with the DGAC recommendation to opt for healthy snacks to improve diet quality and align dietary patterns with recommendations.

However, IFIC consumer research demonstrates that currently, nutrition is not among the top motivators for snacking. The *2020 Food & Health Survey*[1] collected information on why people choose to snack, with the top response being, "I am hungry or thirsty" (35%). "Wanting to have a treat" (25%), "wanting something sweet" (24%) and "wanting something salty" (22%) were the next-most-common responses. Just 12% said that "wanting something nutritious" was a reason for snacking. These results indicate that for many, choosing snacks with high nutritional quality is not always a top priority, which could be one reason why snacks are a significant contributor to the intake of solid fats, added sugars and total energy in the American diet across life stages.

IFIC research[1] has also highlighted wide variability, both individually and within collective subgroups, in terms of snacking habits. Younger consumers, African Americans, those with lower income and education and those with a higher BMI are more likely to snack multiple times a day. Additionally, women are more likely to indicate that they replace meals with snacks at least occasionally compared to men. In these instances in which snacks become more common, so too does the importance of underscoring the health benefits of making more nutrient-dense snacking choices along with providing relevant examples of how such changes can be accomplished.

The *2020-2025 DGA* provide an opportunity to showcase the role that all forms of food can play in meeting healthy snacking goals while offering convenience, affordability and, in the case of packaged foods, shelf-stability. Showcasing more nutritious alternatives to current snack selections is one way to meet the American public where they are while providing reasonable adaptations to increase the overall healthfulness of their diet. Lastly, while IFIC stands in full support of healthy snacking initiatives, we also acknowledge that practical guidelines for snacking should include flexibility for occasional indulgences. In these instances, portion balance and awareness of hunger and satiety cues should also be referenced in the *2020-2025 DGA* as means to emphasize enjoyment as well as the nutrients and calories provided by snacks.

Key Points

1. Snacking is ubiquitous in the U.S., and snacks substantially contribute to overall daily caloric intake. However, nutrition is not a primary motivator for snacking.

[1] International Food Information Council. *2020 Food & Health Survey*. 10 June 2020. https://foodinsight.org/2020-food-and-health-survey/

2. Variability in snacking habits and preferences of different subgroups should be fully appreciated in DGA communications efforts and messages put forth to the public.
3. Achieving the goal of shifting Americans toward nutrient-dense snacks will require approachable, affordable and convenient examples of how to do so.

FUTURE DIRECTIONS: SUSTAINABLE FOOD SYSTEMS

There is a strong desire by Americans to better understand how to identify products that support an environmentally sustainable approach to eating, and IFIC agrees with the 2020 DGAC's recommendation to consider the DGA "in the context of the food environment and overall food system." IFIC encourages the Federal agencies, the 2025 DGAC and future iterations of the DGA to support the inclusion of scientific analyses related to environmental sustainability and a food systems approach to healthy eating. Any DGAC examining this issue should include members with expertise not only in nutrition, but also in sustainable food systems and agriculture.

Three recent IFIC consumer surveys underscore consumer interest in this topic. A survey conducted in April 2020, *Climate Change and Food Production*,[1] found that most people are concerned about climate change, and that over half reported that these concerns at least sometimes impact their food and beverage purchases. Three in five consumers seek out environmentally friendly products in at least some parts of their lives, with food and beverages the top category for doing so. Two out of every three people (67%) also report being at least somewhat concerned about the impact of food production on climate change (and of these, 34% report being very concerned). Consumers also reported a range of labels that influence their perceptions of a food or beverage product's impact on climate change, including "natural," "organic," "locally produced" and "non-GMO." However, none of these labels are direct indicators of a product's environmental impact, exposing an important education gap.

IFIC's *2020 Food & Health Survey*[2] also draws attention to the importance of environmental sustainability, with nearly three in five consumers saying it is important that the foods they purchase or consume are produced in an environmentally sustainable way. This year's survey results showed a statistically significant increase in the percentage of consumers reporting that environmental sustainability has an impact on their food and beverage purchases (34%, up from 27% in 2019). Yet, three in five (63%) said they find it hard to know whether their food choices are environmentally sustainable. Of those, nearly seven in ten (69%) agreed that if it were easier to know whether their food choices were environmentally sustainable, it would have a greater influence on the choices they make.

When this aspect of the American diet is addressed, it should be initiated with a clear definition of "sustainability" as it relates to food systems. IFIC's *Survey of Consumers' Attitudes and Perceptions of Environmentally Sustainable and Healthy Diets*[3] found that 40% of consumers were unsure if an "environmentally sustainable diet" was the same as a "sustainable diet," while 34% said that they were not the same. Additionally, nearly one-quarter of survey takers were not sure if an environmentally sustainable diet can include both animal- and plant-based protein sources.

Key Points

1. IFIC supports the inclusion of scientific analyses related to sustainability and a food systems approach to eating in future iterations of the DGA. DGACs conducting the analyses should include members with expertise not only in nutrition, but also in sustainable food systems and agriculture.
2. There is broad interest and concern about environmental sustainability and the impact of food production on climate change. Yet, consumers find it hard to know whether their food and beverage choices align with their environmental values.

[1] International Food Information Council. *Climate Change and Food Production.* 22 April 2020. https://foodinsight.org/consumer-survey-climate-change-and-food-production/
[2] International Food Information Council. *2020 Food & Health Survey*. 10 June 2020. https://foodinsight.org/2020-food-and-health-survey/
[3] International Food Information Council. *Survey of Consumers' Attitudes and Perceptions of Environmentally Sustainable and Healthy Diets*. 17 September 2019. https://foodinsight.org/sustainability-healthy-diets/

FINAL COMMENTS: COMMUNICATIONS RECOMMENDATIONS FOR THE *2020-2025 DGA*

The DGA remain a central tool to help consumers make more informed choices about what to eat. Importantly, they also set guidance for policy, practitioners, schools and other institutions that further magnify the significance of these recommendations. IFIC's consumer research consistently demonstrates that Americans want healthy options, but they often experience confusion while trying to make fully informed decisions around foods and beverages. Data from IFIC's *2017 Food & Health Survey*[1] shows that most Americans view expert nutrition guidance, such as the DGA, to be important for all life stages. However, in the *2018 Food & Health Survey*[2], 80% reported that they notice a lot of conflicting information on what to eat or avoid. Of those who notice a lot of conflicting information, over half say they doubt their choices as a result.

This doubt is also echoed by consumers' lack of knowledge in connecting foods and nutrients to their desired health benefits. Nearly every respondent on the 2018 Food & Health Survey[2] reported interest in attaining certain health benefits from food, such as weight loss or management and cardiovascular health. Still, many consumers were unsure of what foods to eat to achieve their health goals. Three in five consumers were unable to name a food or nutrient associated with their most desired health benefits. The *2020-2025 DGA* represent an important opportunity to connect *what* to eat, *why* the recommended foods and dietary patterns are connected to health outcomes, and *how* to shop for and prepare healthy foods that fit within personal preferences, cultural norms, grocery budgets and time constraints.

With so many sources of nutrition information available today, it is critical that the DGA are communicated in ways that effectively reach consumers – particularly for the populations most at risk from diet-related health consequences. Communication and education efforts should encompass methods that recognize the diversity of both the citizens of the United States and the platforms from which they receive information.

Over the last three decades, IFIC's consumer insights have helped government agencies, non-governmental organizations and the private sector tailor nutrition education and messages so that the public can better understand how to navigate the many food choices they make each day. IFIC encourages the USDA and HHS to keep the pulse of the consumer central to the *2020-2025 DGA* in a way that also delivers personalized and culturally relevant messages of the DGA to distinct populations, demographics and individuals. Throughout these comments, IFIC has highlighted several population subgroups that may stand to benefit the most from learning about and adopting the DGA, many of which may be bearing the brunt of the economic instability that our country is currently facing. We strongly encourage significant investment in communications and implementation strategies to reach these populations, and support the 2020 DGAC report statement that "[i]n the future, Committees may need to include a review of public health-based strategies that have been successful in promoting higher quality dietary intakes, especially in key populations that are at high risk and/or disadvantaged."

Thank you for this opportunity to submit comments to the Scientific Report of the 2020 DGAC. IFIC looks forward to seeing the *2020-2025 Dietary Guidelines for Americans* reflective of the science-driven, inclusive and transparent approach outlined at the start of this important endeavor.

[1] International Food Information Council. *2017 Food & Health Survey*. 13 May 2017. https://foodinsight.org/2017-food-and-health-survey-a-healthy-perspective-understanding-american-food-values/
[2] International Food Information Council. *2018 Food & Health Survey*. 13 May 2018. https://foodinsight.org/2018-food-and-health-survey/