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Re: Comments to Federal Register Docket ID FNS-2020-0015 on Scientific Report of the 2020 Dietary Guidelines Advisory Committee

Dear Dr. Stoody, Dr. Klurfeld, Ms. de Jesus, Dr. Olson, and other federal officials tasked with updating the *Dietary Guidelines for Americans*:

We, the undersigned researchers, public health professionals and health advocates, both individual and organizational, appreciate this opportunity to provide input as you translate the 2020 Dietary Guidelines Advisory Committee Scientific Report into public-facing materials.

The Scientific Report of the 2020 Dietary Guidelines Advisory Committee (DGAC) repeatedly makes clear that Americans must curb their intake of added sugars.¹ The Committee recommends that Americans aged 2 and older reduce consumption of added sugars to less than 6% of calories, and that children

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under age 2 avoid any added sugars.^{2,3} We support these recommendations and urge you to incorporate them into the 2020-2025 Dietary Guidelines for Americans.

If Americans are to reduce their consumption of added sugars to this extent, most will need to cut their intake of sugar-sweetened beverages (SSBs), because SSBs are the largest single source of added sugars in the American diet and “contribute approximately 30 percent, 50 percent, and 60 percent of added sugars to the diet of young children, adolescents, and adults, respectively.”⁴ As the Report states, “...most adults consume 2 or more sweetened beverages each day. Replacing 1 or both of those [sweetened beverages] per day with water or other beverages that do not contribute energy, all other dietary intakes being consistent, could reduce total energy intakes.”⁵

To help Americans make this change, we, the undersigned researchers, public health professionals and health advocates, submit the following recommendations:

- **Give clear, actionable advice to the American public to drink water in lieu of SSB.**
 - **Include that advice in the 2020-2025 Dietary Guidelines for Americans.**
 - **Include it in all associated educational materials and messaging, particularly the ubiquitous MyPlate graphic.**

The Report supports this, saying,

The Committee also recommends that the *2020-2025 Dietary Guidelines for Americans* provide very specific messaging around beverage intakes, with a focus on sweetened beverages and alcoholic beverages. Current food pattern modeling exercises typically do not include or address beverages, and consumers may be confused by a lack of specific guidance surrounding beverage choices.⁶

As an example of such “specific guidance,” the Alaska Department of Health and Social Services, in its extensive “Play Every Day” public health messaging, includes beverage advice that says, “Drink This, Not That” with clear images specifically promoting water and milk in place of SSB, and clear information on what constitutes an SSB.⁷

There are many ways to support and encourage drinking water consumption. The Scientific Report of the 2015 DGAC included actionable recommendations (please see Appendix). The research literature shows that even simple steps such as promoting intake of water through posters, providing cups next to drinking water sources, or leveraging social networks to promote water intake can make a difference.^{8,9,10,11} We also suggest that USDA and HHS once again include language specific to the benefits of water for oral health such as that in the 2010-2015 Dietary Guidelines for Americans.¹²



A public health strategy to replace SSB consumption with consumption of water is more urgent than ever. The Committee’s Letter to you highlights that COVID-19 has provided a graphic example of the ways that chronic disease – notably, diseases for which SSB intake is a risk factor – can impact health outcomes of COVID-19 infection.

The Committee’s findings confirm the extent of diet-related disease in the adult American population: 71.6% have overweight or obesity, including 7.6% with severe obesity¹³, almost half have diabetes (13.0%) or pre-diabetes (34.5%), and 48.0% have hypertension or other forms of cardiovascular disease.^{14,15,16} In fact, a recent study suggests that, after taking into account metabolic biomarkers, only 12% of the US adult population can be considered optimally healthy.¹⁷

The decision not to perform a full review of water’s effect on health is a major limitation of the Committee’s body of work.¹⁸ The Committee recognizes the need for further research on drinking water in the Report Part E, Future Directions. We believe that the magnitude of the US obesity problem – as well as of other diet-related chronic disease -- should impel USDA and HHS to take all possible steps to reduce consumption of non-nutritive calories by shifting American beverage intake from SSB to water. Studies show that drinking water instead of SSBs and other caloric beverages aids weight management.^{19,20,21, 22, 23}

It should be noted that the Report highlights disparities in the consumption of SSB; shifting all Americans to healthier beverage norms is thus one strategy to reduce diet-related health disparities.²⁴

We strongly encourage USDA and HHS to make very clear recommendations to replace SSB with water in the 2020-2025 Dietary Guidelines for Americans. Since most Americans do not read the Guidelines, we urge you to **add a symbol for water to the My Plate graphic**, and include messages promoting water consumption in place of SSBs in all associated educational products and messaging, for example, by adding messaging such as “every sip counts” to the Report’s suggested message “every bite counts.”²⁵ For more information, please contact ceahecht@ucanr.edu. Thank you for consideration of our comments.

Sincerely,

The undersigned organizations and individuals

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Appendix. 2015 Dietary Guidelines for Americans

In the 2015 Dietary Guidelines Advisory Committee Scientific Report:

- “Added sugars should be reduced in the diet and not replaced with low-calorie sweeteners, but rather with healthy options, such as water in place of sugar-sweetened beverages.”ⁱ
- “Implement the comprehensive school meal guidelines ... from the USDA that ... make drinking water freely available to students throughout the day;”ⁱⁱ
- “Strategies are needed to encourage the U.S. population to drink water when they are thirsty. Water provides a healthy, low-cost, zero-calorie beverage option. Free, clean water should be available in public settings, as well as child care facilities, schools, worksites, publicly funded athletic stadiums and arenas, transportation hubs (e.g., airports) and other community places and should be promoted in all settings where beverages are offered.”ⁱⁱⁱ
- “Drinking water also needs to be readily available and accessible to children.”^{iv}
- “Water is the preferred beverage choice ... Water provides a healthy, low-cost, zero-calorie beverage option. Free, readily accessible, safe water should be available in public settings, as well as child care facilities, schools, worksites and other community places and promoted in all settings where beverages are offered.”^v

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