February 10, 2025

Janet M. de Jesus, MS, RD
Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary
Department of Health and Human Services
1101 Wootton Parkway, Suite 420
Rockville, Maryland 20852

Re: Docket HHS-OASH-2022-0021, 2025 Dietary Guidelines for Americans Committee

Dear Ms. de Jesus,

The undersigned nutrition and public health experts and organizations are pleased to provide comment on the topic of beverages to the U.S. Departments of Agriculture (USDA) and of Health and Human Services (HHS) as they work to develop the 2025-2030 Dietary Guidelines for Americans and associated consumer-facing information. The National Drinking Water Alliance was formed in 2015 because of its founding members' belief that actions to enable consumption of drinking water are a critical part of actions to reduce the consumption of sugar-sweetened beverages (SSBs). In this letter, members of the National Drinking Water Alliance are joined by numerous individuals engaged in the fields of nutrition and public health as well as by organizations working in areas including water provision, public health and nutrition.

We support evidence-based Dietary Guidelines for Americans (DGAs) and know what a powerful lever for positive change they can be. In light of the 2025 Dietary Guidelines Advisory Committee (DGAC) Report as well as other current considerations, we respectfully suggest that this is the time for USDA and HHS to take decisive actions to help and encourage Americans to choose plain water as their primary beverage and, hence, reduce consumption of sugar-sweetened beverages. We strongly urge that **advice to drink water as the primary beverage should be clearly communicated in the 2025-2030 Dietary Guidelines for Americans.** Specifically, we ask that,

- **HHS and USDA act on the 2025 DGAC Report recommendation that says, "The Committee suggests that the 2025-2030 edition** [of the Dietary Guidelines for Americans] **specifically recommend plain drinking water as the primary beverage for people to consume."**[1] The new DGAs should state this clearly and frequently in guidance for ages 2 and over.
    - Healthy Eating Research provides evidence-based beverage recommendations, developed by experts representing four national health and nutrition organizations, for both young children aged 0-5 and children and youth aged 5-18.[2,3] The recommendations provide phraseology that might be used in the 2025-2030 DGAs, as well as a wealth of specific evidence-based beverage recommendations.[4,5]

[1] 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.* U.S. Department of Health and Human Services. https://doi.org/10.52570/DGAC2025. Part D, Chapter 3, pp. 16-17.
[2] Lott M, Callahan E, Welker Duffy E, Story M, Daniels S. Healthy Beverage Consumption in Early Childhood: Recommendations from Key National Health and Nutrition Organizations. Technical Scientific Report. Durham, NC: Healthy Eating Research, 2019. Available at *http://healthyeatingresearch.org*.
[3] Lott M, Reed L, Deuman K, Story M, Cradock A, Patel AI. Healthy Beverage Consumption in School-Age Children and Adolescents: Recommendations from Key National Health and Nutrition Organizations. Consensus Statement. Durham, NC: Healthy Eating Research, 2025. Available at http://healthyeatingresearch.org.
[4] Healthy Eating Research. *Healthy Drinks, Healthy Kids*. At, https://healthydrinkshealthykids.org.
[5] Healthy Eating Research. *Ages 5-18 Beverage Recommendations.* At, https://healthyeatingresearch.org/tips-for-families/ages-5-beverage-recommendations/.

- **USDA take the necessary steps to add a symbol for water to the MyPlate graphic**, and any other graphics, that are used as a depiction of the DGAs for the public and for the nation's nutrition education in schools, childcares, SNAP-Ed and more.
    - In its Report to Congress, the National Clinical Care Commission states, "USDA should add a symbol for drinking water to the MyPlate graphic and increase water promotion messaging in all consumer-facing materials issued by its Center for Nutrition Policy Promotion. Water is not currently depicted on the USDA MyPlate."[6]

Support for our two recommendations is as follows.

The 2025 DGAC Report provides ample support for 2025-2030 DGA guidance that plain water is the best option for hydration. The Report Executive Summary states:

> These findings support existing general recommendations for beverage consumption provided in the Dietary Guidelines, which emphasize consuming water and beverages that contribute beneficial nutrients, such as fat-free and low-fat milk and 100% juices; and reducing intake of beverages (e.g., SSB) that contain calories while contributing limited or no beneficial nutrients. The Committee suggested enhancements to existing recommendations, including an emphasis on plain drinking water as the primary beverage for people to consume, specificity regarding unsweetened fat-free and low-fat dairy milk and unsweetened fortified soy beverages, and clarifying that SSB consumption should be limited. (Executive Summary, pg. 5)

We note and support the following specific recommendations related to drinking water and limiting SSBs in the DGAC Report:

- "The Committee suggests that the 2025-2030 edition specifically recommend plain drinking water as the primary beverage for people to consume." (Part D, Chapter 3, p. 17)
- "For SSB and other beverages that contain added sugars with minimal or no beneficial nutrients, recommendations should state to limit intakes rather than to reduce/decrease them." (Part D, Chapter 3, p. 18)
- "Given continuing questions and uncertainty about the long-term effectiveness of LNCSB [low- and no-calorie sweeteners in beverages] for weight management, emphasis should be on consumption of water and nutrient-dense beverages. This is particularly important for children; a consensus statement from AND, AAPD, AAP, and AHA recommends that children younger than 5 years not consume LNCSB." (Part D, Ch. 3, p. 18)

[6] National Clinical Care Commission. 2022. *Report to Congress on Leveraging Federal Programs to Prevent and Control Diabetes and Its Complications, 2021*. Chapter 4. Population-Level Diabetes Prevention and Control. At https://health.gov/about-odphp/committees-workgroups/national-clinical-care-commission/report-congress, pages 38-41.

    - The newly-released consensus statement on healthy drink recommendations for ages 5-18 states that children up to age 18 should avoid LNCSB.[3,5]
- "The next edition of the Dietary Guidelines for Americans should clearly state that water and nutrient-dense beverages should be the primary beverages consumed during pregnancy and lactation." (Part D. Ch. 3: Beverages, pg. 18)
- "Oral health and nutrition have a bidirectional relationship. Dietary behaviors that may contribute to dental health include consuming foods and beverages that are low in sugar or acid, meeting calcium recommendations, drinking fluoridated water, and limiting alcohol intake." (Part D. Ch. 1, pg. 41)

Our second recommendation, that USDA take the necessary steps to add a symbol for water to the nutritional guidance (MyPlate) graphic has been promoted by leading public health professionals and organizations. Letters on this issue were submitted to the Dietary Guidelines Advisory Committees of 2014[7] and 2020,[8] and to USDA and HHS in 2020.[9] Additionally, a bipartisan group of sixty-nine members of the House of Representatives sent a letter to USDA and HHS making this request in 2019.[10] In spring 2024, sixty members of both parties in the House and Senate sent letters to USDA and HHS, letting the agencies know that members of Congress would like to see the agencies add a symbol for water to MyPlate.[11]

In addition to our two recommendations, we wish to observe that many comments recommending actions to enable drinking water were submitted in the recent public comment period to the DGAC (Federal Register Docket HHS-OASH-2022-0021). These support the timeliness of decisive actions by your agencies to promote drinking water in place of sugary drinks. Other nations have already recognized the importance of incorporating drinking water into their dietary guidance graphic.[12] Eighty countries around the globe include some type of symbol or icon promoting drinking water in their guidance graphic.[13]

We further note that substitution of water for sugary drinks supports two additional areas of increasing public and scientific concern: strategies to reduce ultra-processed foods (UPFs) in the diet, and the sustainability of American food patterns. Research suggests that most added

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[7] Ritchie LD et al. 2014. *Letter to Chairwoman Millen and Members of the Dietary Guidelines Advisory Committee*. At, https://npi.ucanr.edu/files/207504.pdf

[8] National Drinking Water Alliance. 2020. *Letter to Chairwoman Schneeman and Members of the 2020 Dietary Guidelines Advisory Committee*. At, https://ucanr.edu/sites/NewNutritionPolicyInstitute/files/318141.pdf

[9] National Drinking Water Alliance. 2020. *Letter to USDA and HHS.* At, https://ucanr.edu/sites/NewNutritionPolicyInstitute/files/332232.pdf

[10] Members of Congress. 2019. Letter to Secretaries Azar and Purdue. Available at, https://docs.wixstatic.com/ugd/9c073b_2d7590f8a6924a9b82f261075c4da7fc.pdf

[11] Members of Congress. 2024. Letter to Secretaries Becerra and Vilsack. Available at, https://crockett.house.gov/sites/evo-subsites/crockett.house.gov/files/evo-media-document/Add%20Water%20Graphic%20To%20MyPlate%20Letter.pdf

[12] Herforth A, Arimond M, Álvarez-Sánchez C, Coates J, Christianson K, Muehlhoff E. 2019. A Global Review of Food-Based Dietary Guidelines. Adv Nutr. **10**(4):590-605.

[13] 2025 International Council of Bottled Water Associations. 2025. *Global Water Consumption Guidelines.* At, https://bottledwater.org/wp-content/uploads/2025/02/Global-Water-Consumption-Guidelines-2025_final.pdf

sugars intake in the US diet is from UPFs and among those, the leading sources of added sugars were SSBs.[14] Drinking water is a more sustainable choice because its production uses less water and emits fewer greenhouse gases.[15] As of 2022, 37 countries—including the majority of high-income countries—explicitly used environmental sustainability as a guiding principle in their government-endorsed dietary guidelines.[16]

We also take this opportunity to highlight the recommendation of the National Academies of Sciences, Engineering, and Medicine (NASEM) that, should there be any omissions or significant changes of the DGAC's Scientific Report in HHS and USDA's translation of Report findings and recommendations to the final Dietary Guidelines, the Departments should publicly disclose a clear explanation of their reasoning.[17]

Thank you for this opportunity to provide public comment as your agencies develop both the 2025-2030 Dietary Guidelines for Americans and ancillary consumer-facing products.

Sincerely,

The undersigned organizations and individuals

Organizations

American Academy of Pediatric Dentistry

American College of Lifestyle Medicine

Bay Area Nutrition and Physical Activity Collaborative (BANPAC)

Boulder County Public Health

California Water Association

Center for Science in the Public Interest

Common Threads

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[14] Martínez Steele E, Baraldi LG, Louzada MLDC*, et al.* Ultra-processed foods and added sugars in the US diet: evidence from a nationally representative cross-sectional study. *BMJ Open* 2016; **6:**e009892.
[15] Meisterling K et al. 2022. Healthy beverage initiatives: A case study of scenarios for optimizing their environmental benefits on a university campus, *Cleaner and Responsible Consumption*, 4:100049
[16] James-Martin G, Baird DL, Hendrie, GA, Bogard J, Anastasiou K et al. 2022. Environmental sustainability in national food-based dietary guidelines: a global review. *The Lancet Planetary Health*, **6**(12): e977 - e986.
[17] National Academies of Sciences, Engineering, and Medicine. 2023. *Evaluating the Process to Develop the Dietary Guidelines for Americans, 2020-2025: Final Report*. Washington, DC: The National Academies Press. https://doi.org/10.17226/26653.

Drinking Water Research Foundation

Earth Ethics, Inc.

Hawaii Public Health Institute

Healthy Food America

Hydration Health Center

International Bottled Water Association

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National Association of Pediatric Nurse Practitioners (NAPNAP)

National Children's Oral Health Foundation

National Drinking Water Alliance

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Open Door Health

Partnership for a Healthier America

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Rhode Island Public Health Institute

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