



October 17, 2014

Designated Federal Officer, 2015 DGAC  
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**RE: Request 5-2 Food Systems Sustainability**

Dear Dr. Olson and Dietary Guidelines Advisory Committee:

The American Meat Institute (AMI) and the North American Meat Association (NAMA) (hereinafter the organizations) respectfully submit the following comments in response to the Dietary Guidelines Advisory Committee's (DGAC or Committee) specific request for information on sustainability. The organizations have and will continue to support the use of sound science as the foundation for public nutrition policy.

AMI is the nation's oldest and largest meat packing and processing industry trade association. AMI members slaughter and process more than 90 percent of the nation's beef, pork, lamb, veal, and a majority of the turkey produced in the United States. Approximately 80 percent of AMI member companies are small or very small based on Small Business Administration standards.

Organized in 1942, NAMA is a trade association with more than 400 member companies in the United States, Canada, and Mexico, representing every segment of the meat industry. Since its inception, NAMA has provided its members with regulatory advocacy, educational opportunities, and informational resources.

Meat and poultry products play an important role in a healthy, well-balanced diet. By including meat and poultry in their diet, consumers can more easily fulfill their macronutrient requirements, as well as a single source of all essential amino acids. The meat and poultry industry is committed to providing safe, wholesome, and diverse nutritious products to consumers so they can make educated decisions in choosing the foods that best fit their personal lifestyle and family needs.

The Committee is comprised of experts in nutrition and epidemiology. AMI and NAMA maintain that addressing the variety of issues attendant to sustainability is outside the Committee's expertise and could dilute the importance of the Committee's recommendations. Accordingly, the organizations respectfully request the Committee's consideration of the following comments.

### **Sustainability is a Complex Issue That Cannot be Resolved in One Step.**

The meat and poultry industry has long recognized the importance and necessity of a sustainable food supply. Sustainability is a complex issue that is being addressed by various experts in a number of other forums, *e.g.* Institute of Medicine's *ad hoc* expert committee developing a "Framework for Assessing Health, Environmental, and Social Effects of the Food System"<sup>1</sup>. Until those expert panels have drawn more concrete conclusions, it is premature for the Committee to incorporate such considerations into its dietary guidance recommendations. To do so runs the risk the Committee will act on incomplete data.

Sustainability, as it is understood by the lay person, is often counter-intuitive. For example, there are some who assume, wrongly, that if production animal agriculture were eliminated, the food supply as a whole would be more sustainable. As Vieux *et al* noted when fruits and vegetables were iso-calorically substituted for meat, there was either no change or even an increase in greenhouse gas emissions because of the amount of fruits and vegetables to maintain the caloric content was so high.<sup>2</sup> This myopic view ignores the simple fact that much of the land used to produce livestock based foods is not arable and cannot simply be utilized for other food production purposes.

Moreover, it is commonly assumed that larger food production operations are the problem and that if food production returned to local or regional systems then the problems would be solved. This is not necessarily the case. In many respects, larger food production operations and facilities are more efficient and the proportional footprint of output versus input often is less than a smaller facility. Experts in the field of sustainability recognize that there is a place for all production types, from small organic processors to conventional, large multi-facility operations within a sustainable food supply. A balanced approach to addressing sustainability is necessary to minimize the risk of unintended consequences.

### **Food Processing Plays a Role in a Sustainable Food Supply.**

In general, processed foods, whether meats, canned vegetables, or other products, lend themselves to a more sustainable food supply. Such production practices allow for maximum utilization of crop yields and minimize the potential for food waste. The organizations are concerned that during the Committee's evaluation of dietary patterns and sustainability, there has been little recognition or appreciation of the role food processing plays in a sustainable food supply.

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<sup>1</sup> <http://www8.nationalacademies.org/cp/projectview.aspx?key=49544>. Accessed October 16, 2014.

<sup>2</sup> Vieux, F., Darmon, N., Touazi, D. and Soler, L.G. (2012). Greenhouse gas emissions of self-selected individual diets in France: Changing the diet structure or consuming less? *Ecological Economics*. 75, issue C, p. 91-101.

Processed meats are an example of the meat and poultry industry's focus on sustainability. Not only is it ethically the right thing to do, but making food products from the entire animal is the most sustainable thing to do. In some cases, nearly 70 percent of the animal goes into processed products. To disregard such a significant portion of the animal is irresponsible, especially when those products provide an affordable, safe and nutrient dense form of protein.

### **The Committee's Operationalized Draft Definition Lacks Critical Components.**

During the fourth and fifth DGAC meetings, Subcommittee 5 shared its definition of a sustainable diet as "a pattern of eating that promotes health and well-being, and provides food security for current and future populations while sustaining human and natural resources."

This definition is incomplete and does not contain some integral elements of a more comprehensive definition developed by experts in the field of sustainability, *e.g.* Food and Agriculture Organization of the United Nations (FAO). Specifically, FAO defines sustainable diets as

*"those diets with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources."*<sup>3</sup>

If a sustainable diet is intended to improve both the health of Americans and better utilize natural resources, it must be realistic, achievable and easily implemented into the American lifestyle. Although the Subcommittee noted in the draft implications presented at the fifth meeting that careful consideration would need to be made to ensure that sustainable diets are affordable for all Americans, devising a sustainable diet that will be adopted goes beyond cost. Specifically, the nutritional adequacy of potential food group substitutions, food safety, and cultural acceptability also must be considered. The United States has a diverse population and a one-size-fits-all approach cannot be taken because it will not work. In developing or recommending a sustainable diet the Committee must recognize the impact that ethnicity, culture, and region has on dietary choices. A diet that may be culturally appropriate in New England may not be recognizable to someone living in Southern Texas. A comprehensive balanced approach is necessary to avoid risk for rejection.

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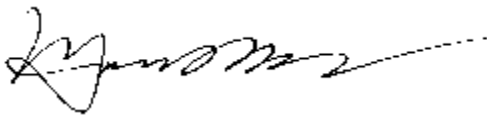
<sup>3</sup> Sustainable Diets and Biodiversity: Directions and Solutions for Policy, Research and Action, Proceedings of the International Scientific Symposium Biodiversity and Sustainable Diets United Against Hunger, 3-5 November 2010.

**Summary**

The meat and poultry industry has been in the forefront with respect to ensuring future viability and availability of resources to sustain its businesses. Sustainability is a complex issue that demands consideration of an array of scientific issues by experts in those fields. To address a sustainable dietary pattern only using limited indicators does a disservice to the importance of affordability, nutrient adequacy, safety and cultural relevance. There must be a comprehensive and balanced approach to dietary guidance to achieve greater acceptance and incorporation into the American lifestyle.

AMI and NAMA appreciate the opportunity to provide these comments. If you have any questions about any aspect of these comments or would like to discuss them, please contact AMI at 202-587-4200 or NAMA at 800-368-3043. Thank you.

Respectfully submitted,



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cc: Jim Hodges  
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