May 8, 2015

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave. SW
Washington, DC 20250

Secretary Sylvia Mathews Burwell
U.S. Department of Health and Human Services
200 Independence Ave. SW
Washington, DC 20201

RE: 2015 Dietary Guidelines Advisory Committee’s Recommendations

The National Cattlemen’s Beef Association (NCBA) appreciates this opportunity to comment on the recommendations included in the 2015 Dietary Guidelines Advisory Committee’s report. NCBA appreciates the extension of the comment period to allow additional time to carefully review the Committee’s recommendations. NCBA is the nation’s oldest and largest national trade association for cattlemen and cattlewomen representing more than 175,000 cattle producers through direct membership and our state affiliates. The top priority of America’s cattle producers is to produce the safest, most nutritious and affordable beef products in the world. Our industry has a long history of supporting nutrition research to answer nutrition-based questions for our consumers who enjoy beef as part of a healthy and balanced diet. Since 1984, NCBA’s Statement of Principles Regarding Nutrition and Health, have been in place and are reviewed and updated every five years, reinforcing our membership’s commitment to beef’s role in a healthful diet.

There is an overwhelming body of scientific evidence that shows lean red meat plays an important role in a healthy dietary pattern. Unfortunately, the Advisory Committee failed to review strong evidence from gold standard studies like the Beef in an Optimal Lean Diet (BOLD) study and made an unsubstantiated decision to remove lean meats from the overall message of a healthy dietary pattern for Americans. It is unfortunate the Nutrition Evidence Library excluded the BOLD study published by Roussell et al., in the American Journal of Clinical Nutrition in 2012, based on an arbitrary decision. The 2010 Dietary Guidelines for Americans, along with the 2010 Advisory Committee, recognized lean red meat’s important role in a healthful diet and identified it as a nutrient-rich food Americans should increase. To date, there are nearly 20 randomized controlled, trials including the BOLD study, showing that healthful dietary patterns consuming 4-5.5 ounces of lean red meat daily supports good health. The Advisory Committee ignored this evidence, and instead relied heavily on weaker forms of science, such as observational evidence. The recommendations of the 2015 DGAC are in direct conflict with more than three decades of scientific evidence and all previous editions of the Dietary Guidelines for Americans. The bottom line is that there is significant scientific evidence to support the inclusion of lean red beef more often as part of healthy dietary patterns.
We urge you and your staff to finish the scientific review of red meat’s role in a healthy diet and re-instate the 2010 Dietary Guidelines recommendation recognizing lean meats as a food to increase in a healthy diet.

Over the last 30 years our consumers asked for a leaner beef supply, and as a direct result, America’s cattle industry responded. In fact, since the Dietary Guidelines for Americans were first issued in 1980, external fat on retail beef cuts has decreased by 81% and per capita available total fat from beef has been reduced by 44% and saturated fat by 29%. Today’s beef is lean beef. More than 65% of beef cuts sold at retail meet USDA’s guideline for “lean” when cooked and trimmed. Retail data also shows that sales of 90% lean and leaner ground beef increased 25% between 2008 and 2013. While meat, including red meat, remains a core food in the American diet, the public has moderated their red meat intake over time. According to recent NHANES data, total beef intake contributes only about 5% of the calories and Americans are eating about 1.7 ounces of beef per day. Furthermore, nationally representative dietary data from What We Eat in America, NHANES 2009-2010 identifies mean (red) meat (lean portions) intake consumed by individuals two and older in the U.S. at 1.52 ounces per day, or 10.64 ounces per week, which is less than the 12 ½ ounces of meat recommended in the Healthy U.S.-style and Healthy Mediterranean-style Patterns.

This data suggests Americans should be encouraged to choose lean red meat more often as part of a healthy dietary pattern to meet the recommendations in Healthy U.S.-style and Healthy Mediterranean-style Patterns reported in Table D1.32 of the report.

Beef is a nutrient-rich food. Total beef consumption contributes 5% of the total calories and 10% or less of the total fat and saturated fat in American diets. Beef also provides more than 5% of eight essential nutrients including potassium, a nutrient of concern for the entire population, and iron, which is a nutrient of concern for adolescent and young women. A generalized recommendation to reduce red meat could be misinterpreted by certain populations already at-risk for under-consuming meat and lead to adverse health outcomes such as protein malnutrition in the elderly and iron deficiency in young females. History offers an important lesson: declines in red meat intake over time have been accompanied by increased consumption of refined grains, added fats and sugars and rising rates of obesity. While NCBA’s membership appreciates the Committee’s endorsement of the Mediterranean diet as a healthy dietary pattern for Americans to consider, unfortunately the Committee failed to accurately translate the dietary pattern consumed in the Mediterranean studies into their recommended “Healthy Mediterranean-style Pattern.” Data reviewed by the Committee showed most studies with a Mediterranean dietary pattern reporting favorable health outcome have red and processed meat intake well above the range usually consumed by Americans and also above the amounts recommended in the Healthy Mediterranean-style Pattern (as reported in Figure D1.59). Based on the scientific evidence reviewed, it is unclear why the Healthy Mediterranean-style Pattern doesn’t reflect the known composition of this healthful dietary pattern.

We urge you to ignore the overgeneralized recommendation to reduce red meat consumption as it is not based upon the most recent evidence and, as history has shown, could likely be misinterpreted, leading to detrimental health consequences for many Americans.
Furthermore, the 2015 Advisory Committee included topics beyond their scope of nutrition and health scientific evidence in their final report. The Advisory Committee clearly does not have the background or expertise to evaluate the complex relationship between food production and the dietary needs of a growing American and international population. The major findings in the report with regards to sustainability do not take into account the multi-faceted disciplines with proper expertise to develop a framework that includes environmental and animal scientists among many other experts. The methodologies currently being discussed to quantify environmental impacts of food animal production are still a work in development. It is important for the discussion of sustainability to include many of the improvements animal agriculture has already undertaken, especially in the U.S. but to also realize how U.S. animal agriculture is providing nutrient-dense, high quality protein for international consumers. It is not appropriate for the Advisory Committee to provide recommendations on a topic like sustainability where much of the research is in development and outside of their expertise. According to U.S. scientists who are recognized internationally for their expertise in sustainability – there is no way to fully quantify the sustainability of one food compared to another. The Advisory Committee reviewed incomplete research and recommended certain foods over another without having the evidence to support their inaccurate conclusions. The U.S. cattle industry welcomes an evidence-based discussion on the significant achievements of the overall environmental and social fingerprint of the beef industry. However, the topic of sustainability is outside the scope of the Dietary Guidelines as well as the Advisory Committee.

We urge you to reject any topics beyond the scope of scientific evidence with regards to nutrition and health.

As the Agencies review the public comments and the Advisory Committee’s report, it is imperative to ensure the 2015 Dietary Guidelines qualitative messages are consistent with the quantifiable data included in the final report. For example, the 2015 Advisory Committee’s report removes lean meat from the definition of a healthy dietary pattern and further suggests for Americans to reduce red and processed meats. These two qualitative messages are not reflective of the actual quantifiable dietary pattern recommended in Table D-1.32, which clearly includes lean red meat in two of the three dietary patterns recommended by the Advisory Committee. It’s also important to note the dietary patterns recommended in the 2015 Advisory Committee’s report are exactly the same as recommended in the 2010 Dietary Guidelines for Americans. The Committee’s recommendations should reflect the totality of the science and the final 2015 Dietary Guidelines for Americans must translate current science into real world application that can help consumers make better food choices. Americans are choosing lean beef more often and the totality of evidence reinforces that current consumption of beef is within the proper amounts to promote good health. As in the 2010 Dietary Guidelines for Americans, the 2015 Guidelines should encourage Americans to choose a healthy dietary pattern that is rich in vegetables, fruit, whole grains, seafood, legumes, nuts and lean meats.
NCBA appreciates the opportunity to provide input from our membership on the Advisory Committee’s report. Attached to our comments is significant scientific literature we respectfully request for you to review and consider to ensure the final 2015 Dietary Guidelines are supported by the latest scientific evidence – even if some of the studies were not considered by the Advisory Committee. Significant scientific evidence supports Americans choosing lean red meat, like nutrient-rich beef more often as part of a healthy diet. The Dietary Guidelines for Americans play an important role to help people choose and enjoy foods that can improve their health, and it is imperative the guidelines reflect the latest nutrition evidence. Please contact our staff should you have any questions or seek additional scientific information.

Sincerely,

[Signature]

Philip Ellis
President
National Cattlemen’s Beef Association
References


Daly RM, et al. Protein-enriched diet, with the use of lean red meat, combined with progressive resistance training enhances lean tissue mass and muscle strength and reduces circulating IL-6 concentrations in elderly women: a cluster randomized controlled trial. Am J Clin Nutr 2014;99:899-910.


What We Eat in America, NHANES 2009-2010, individuals 2 years and over (excluding breast-fed children), day 1 dietary intake data, weighted. Food Patterns Equivalents Database (FPED) 2009-2010. Available at http://www.ars.usda.gov/SP2UserFiles/Place/80400530/pdf/fped/Table_1_FPED_GEN_0910.pdf

