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February 4, 2025

Janet M. de Jesus, MS, RD
HHS/OASH Office of Disease Prevention and Health Promotion (ODPHP)
1101 Wootton Parkway
Suite 420
Rockville, MD 20852

Re: Docket HHS-OASH-2024-0017

Dear Director de Jesus:

On behalf of Oldways, a 501(c)3 educational nonprofit dedicated to inspiring people to embrace the healthy and sustainable joys of the old ways of eating, we are writing to provide comments on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee.

Oldways has been documenting traditional cultural foodways for more than three decades, leveraging the expertise of diverse committees of subject-matter experts in both nutrition research and culinary history across a broad range of cultural diets. Additionally, our organization created and runs the Oldways Whole Grains Council and has been involved in whole grain education and labeling in the United States and in many other countries over the past 20 years.

We concur with the committee's recommendation to increase the intake of plant-based proteins like beans, peas, and lentils, and decrease the intake of red and processed meats. These shifts are important to highlight in the upcoming 2025-2030 Dietary Guidelines for Americans, as these changes would significantly increase diet quality and reduce the risk of noncommunicable disease among Americans. Additionally, we are writing to express strong support of the emphasis on cultural food traditions and whole grains and we urge the HHS and USDA to carry forward these recommendations into the final 2025-2030 Dietary Guidelines for Americans. Specifically, we lend our collective support to the following elements of the report.

Reducing Health Inequities through Cultural Food Traditions

After more than three decades of working to elevate diverse cultural food traditions through Oldways' programs and Heritage Diet Pyramids, it is encouraging to see the committee acknowledge that "culturally responsive interventions may help promote better adherence and support uptake of dietary guidance by providing individuals with foods that align with their cultural practices and preferences." Further, we are pleased that the committee "recommends more research to fully elucidate the effect of cultural tailoring on program acceptability and effectiveness for health outcomes," and advises HHS and USDA to "allocate sufficient funding for culturally responsive research."

In light of the findings of the first ever evidence scan on culturally responsive nutrition interventions, we are supportive of reframing the Healthy US Style Dietary pattern as the "Eat

Healthy Your Way” pattern to place a larger emphasis on culturally-tailored eating patterns. We hope that this is the first of many steps to help Americans rediscover the goodness of cultural food traditions and reclaim their health by reclaiming their heritage.

Strong Emphasis on Whole Grains

We strongly support the report’s emphasis on the importance of whole grains. In line with clear and consistent evidence, we are encouraged that the report recognizes that diets higher in whole grains are linked with a lower risk of heart disease, type 2 diabetes, colorectal cancer, breast cancer, obesity, gestational diabetes, excess gestational weight gain, and small-for-gestational age babies.

Additionally, the report includes the recommendation to “Increase emphasis on Whole Grains, provide clear definitions and/or examples of Whole Grains,” and “recommend that Grains are “mostly Whole Grains” instead of “at least half Whole Grains.”” When describing the flexibilities that exist within the recommended “Eat Healthy Your Way” Dietary pattern, the report proposes “noting how intakes should be at least half Whole Grains, but highlighting shifts to even more Whole Grains.”

We are encouraged that the recommendation to make at least half your grains whole remains, with specific guidance to “encourage mostly whole grains and lower refined grains.” It’s essential that a distinction be made between these grain categories and their associated health impacts in the 2025-2030 Dietary Guidelines for Americans, and that increased whole grain intake continues to be encouraged among American consumers.

As it stands, the United States’ recommendation of at least 3 ounce-equivalents of whole grains per day (or at least 48g total) is on the low end of global recommendations. [Singapore recommends 50 grams daily](#), [Denmark recommends 75 grams daily](#), and [Sweden recommends 70-90 grams daily](#). The [Nordic Council of Ministers increased its whole grain intake recommendation to 90g in 2023](#), and the [2019 Eat-Lancet Commission Report recommends 232g of whole grain per day](#), just to name a few examples from our peers. In the years since the 2020-2025 Dietary Guidelines for Americans were published, scientific evidence on the health benefits of whole grains has continued to grow dramatically, linking whole grains with [slower cognitive decline in aging](#), [improved weight control](#), and [reduced risk for type 2 diabetes](#), among many other benefits.

Our [analyses](#) have found that in several product categories, such as rice, crackers, and pasta, whole grain options are priced similarly to their refined counterparts, suggesting that making the switch to whole grains will not create a significant economic barrier for most consumers. Additionally, numerous studies have found that increasing whole grain intake without making any other dietary changes can save billions of dollars in healthcare costs. Specifically, [a meta-analysis](#) found that if whole grain intake were increased to meet levels recommended in the 2020-2025 Dietary Guidelines for Americans, the estimated direct medical cost savings from reduced risk of cardiovascular disease in the U.S. would be \$21.9 billion annually. Similarly, researchers have [estimated](#) that low intake of whole grains alone is associated with an average \$45 cost per person (or about \$7.5 billion nationally) in cardiometabolic healthcare costs.



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The [Global Burden of Diseases Study](#) found that "low intake of whole grains was the leading dietary risk factor for [disability-adjusted life-years] among men and women and the leading dietary risk factor for mortality among women" ahead of high sodium intake, high trans-fat intake, and high sugar-sweetened-beverage intake. The 2020-2025 Dietary Guidelines for Americans reports that most Americans exceed the recommended intake for refined grains, while 98% fall short of the recommended whole grain intake. Maintaining strong whole grain recommendations in the 2025-2030 Dietary Guidelines for Americans is vital to improve the diet quality and public health of Americans.

Closing Remarks

We applaud committee members for prioritizing public health and for taking a thorough, evidence-based approach to evaluating the science. Policy changes can make a big difference in the intersection between public health and the food supply; we trust that a clear recommendation for increased whole grain consumption, plant-based proteins, and cultural food traditions in the DGA would create space for an even greater number of culturally-relevant, nutritionally-dense products to be brought to market at accessible price points. We urge the HHS and USDA to carry forward the recommendations described above into the final 2025-2030 Dietary Guidelines for Americans.

Sincerely,

A handwritten signature in blue ink that reads "Sara Baer-Sinnott".

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President, Oldways
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A handwritten signature in black ink that reads "Kelly LeBlanc".

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A handwritten signature in black ink that reads "Caroline Sluyter".

Caroline Sluyter
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