



New York Farm Bureau • 159 Wolf Road P.O. Box 5330 • Albany, New York 12205 • (518) 436-8495 Fax: (518) 431-5656

May 8, 2015

Designated Federal Officer, 2015 DGAC
Richard D. Olson, M.D., M.P.H.
Office of Disease Prevention and Health Promotion
OASH/HHS
1101 Wootton Parkway
Suite LL100 Tower Building
Rockville, MD 20852

RE: New York Farm Bureau Comments on the Scientific Report of the 2015 Dietary Guidelines Advisory Committee.

To Whom It May Concern:

New York Farm Bureau the State's largest general farm organization, appreciates the opportunity to comment and give input on the scientific report of the 2015 Dietary Guidelines Advisory Committee. Our farmers produce healthy fruits, vegetables, dairy and meats that are produced in accordance with the highest standards for quality, food safety and environmental protection. While we understand that the development of the 2015 Dietary Guidelines is still in its early stages, we have concerns about how the process has unfolded to this point.

The influence of the dietary guidelines is pervasive, not only spanning a broad array of policy issues but also extending far into the future by shaping the lasting perceptions and attitudes of consumers towards the foods they eat. The dietary guidelines directly impact the development of policy; they impact the administration and delivery of existing programs; and they impact the educational messaging directed toward American consumers with respect to food and nutritional issues. Due to the influential nature of the dietary guidelines, it is imperative that Department of Health and Human Services (HHS) and the Department of Agriculture (USDA) base the guidelines on well-established, widely-accepted scientific evidence.

Unfortunately, the scientific report of the advisory committee goes well beyond its designated scope of work, delivering a report that strongly suggests the committee would base dietary guidelines on more than health and nutrition considerations. The report discusses sustainable agriculture and production methods of aquaculture, citing a need "to have alignment and consistency in dietary guidance that promotes both health and sustainability." Although we agree that these are important issues that our members are actively involved in there are agencies, laws and regulations outside the scope of the dietary guidelines that are more appropriate venues for these discussions.

The sustainability of agriculture is why our organization exists – to help ensure the future of our member farms. We have been involved for many years on initiatives to assess and improve the sustainability of agricultural production in this country and around the globe, however, we take exception with the limited view of sustainability promoted by this committee’s report.

First off, the committee seems to get its perspective on agricultural sustainability primarily from the U.N. Food and Agricultural Organization (FAO), relying on that organization for the definition of sustainable diets that forms the foundation for the committee’s review. Much of the FAO’s prior work on this issue of sustainability has been problematic. Their own 2006 report, *Livestock’s Long Shadow*¹, has been highly influential, providing the basis for innumerable attacks against the livestock and poultry industry despite its serious and well-documented methodical flaws². The committee’s report also draws on other work on sustainability that starts with a prejudicial view of commercial agriculture in the U.S. This is not a sound basis for a fair and objective discussion of the issue.

A larger problem with the committee’s approach to sustainability is that the concept of sustainability itself is too vague to merit inclusion in the work of a committee that ought to be—and has been explicitly directed to be – concerned with concrete issues of human nutrition. The committee does not know, and in fact cannot know, the extent to which any recommendations related to dietary guidelines might actually contribute to global agricultural sustainability. In a number of instances, the committee refers to the reductions in greenhouse gas (GHG) emissions associated with particular dietary changes. For example, the committee cites work from³ the United Kingdom which calculated that a quite massive shift to vegetarian and/or low-meat diets would reduce CO_2 emissions from the agricultural sector by approximately 3 percent⁴. What would a roughly 3 percent reduction in CO_2 emissions mean for the sustainability of agriculture production? This question cannot be answered in even approximate terms. No attempt is made to actually quantify the impact of any proposed changes on the level, variability or actual sustainability of agricultural production.

The committee also does not give any consideration to modern production methods and technology that greatly affect agriculture’s environmental impact. For example, over the last 30 years the environmental sustainability of beef production has improved considerably. Advances in production practices resulted in 13 percent more beef produced with 13 percent fewer animals. This provided an 18 percent decrease in total carbon emissions, used 30 percent less land, 20 percent less feed and 14 percent less water⁵.

¹ Steinfeld, H., P. Gerber, T. Wassenaar, V. Castel, M. Rosales, and C.de Haan. 2006. *Livestock’s Long Shadow: Environmental Issues and Options*. Rome: United Nations Food and Agriculture Organization.

² For a summary of the major problems with *Livestock’s Long Shadow*, see Place, S.E. and Mitloehner, F.F. (2012). “Beef Production in Balance: Considerations for Life Cycle Analysis.” *Meat Science* 92:179-181.

³ Aston, L.M., J.N. Smith, J.W. Powles. 2012. “Impact of a Reduced Red and Processed Meat Dietary Pattern on Disease Risks and Greenhouse Gas Emissions in the UK: A Modelling Study. *BMF Open* 2(5):e001072. Available online at <http://bmjopen.bmj.com/content/2/5/2001072.full>

⁴ *Scientific Report of the 2015 Dietary Guidelines Advisory Committee*. Washington, DC: U.S. Department of Agriculture and U.S. Department of Health and Human Services, February 2015. Part D. Chapter 5: Food Sustainability and Safety, p. 12.

⁵ Environmental Sustainability of Beef Production has Improved Considerably over Last 30 Years, WSU Expert Says. *Washington State University*. August 1, 2011.

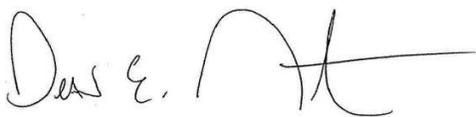
The beef industry is not alone in its attempts to reduce its environmental impact. The dairy industry is the largest agricultural industry in New York and has a strong record of producing more with less. Nationally, for the period from 1944 to 2007 the industry has used 90 percent less cropland, produced 76 percent less manure, used 65 percent less water and has produced 63 percent less carbon emission while producing 400 percent more milk⁶. From 1990 to 2013, milk production has increased approximately 56 percent in New York from an average per cow of about 1150 lbs. to 1800 lbs., making production even more efficient. Further, in 2009 the industry committed to a voluntarily goal to reduce GHG emissions by 25 percent by 2020 and they're not making this commitment alone. Strategic partners include the World Wildlife Fund, the Department of Agriculture (USDA), Center for Advanced Energy Studies (CaES), the U.S. Environmental Protection Agency (EPA) and various other partners from different industries. Dairy farms are also making investments in renewable energy such as solar and anaerobic digesters using their byproducts to make energy. Again, the committee does not take any of these factors into consideration when discussing sustainability and modern agricultural practices continue to reduce the environmental impact of all commodities produced.

Another concern with the discussion of agriculture sustainability is the admission that the costs of food will go up – with families currently struggling to get the recommended diet how does the committee expect to meet the nutritional needs of these families after adding these costs? Further, how does the committee expect schools, senior centers and other institutions to provide nutritious foods on their tight budgets? Our country is plagued with obesity and other preventative diseases due to poor diet and it should be the goal of this committee to make recommendations to the American people to address this issue.

We join the committee in recognizing the importance of this subject, however, there is no scientific basis for incorporating sustainability concepts into dietary guidelines. Existing definitions of sustainability are too vague to be actionable in terms of policy development. Moreover, the linkages between what can currently be measured and actual agricultural sustainability are not well defined. We urge USDA and HHS to refrain from any attempt to incorporate sustainability considerations into dietary guidelines.

Once again, we appreciate the opportunity to comment and give input on the scientific report of the 2015 Dietary Guidelines Advisory Committee.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean E. Norton". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dean E Norton
President

⁶ 2013 U.S. Dairy Sustainability Report. (2014) Innovative Center for U.S. Dairy.