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March 30, 2018

USDA Food and Nutrition Service  
Center for Nutrition Policy and Promotion  
3101 Park Center Drive, Suite 1034  
Alexandria, VA 22302

**Re: Docket ID: FNS-2018-0005, Topics and Scientific Questions for the 2020-2025 Dietary Guidelines for Americans**

To Whom It May Concern:

The New York Farm Bureau (NYFB), New York State's largest general farm organization, appreciates the opportunity to comment on the Dietary Guidelines and the priority topics and supporting scientific questions that will guide the development of the upcoming 2020-2025 edition of the Dietary Guidelines for Americans (DGA). 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.

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.

As Department of Health and Human Services (HHS) and the Department of Agriculture (USDA) continue to develop the 2020-2025 Guidelines, it is important that products like whole milk be included in consideration for inclusion in not only children's dietary guidelines but adults as well. A new randomized controlled trial of 17 healthy adults in Denmark found drinking about 2 cups of whole milk per day for three weeks did not negatively impact markers of CVD or Type 2 diabetes (T2D), compared to drinking fat-free milk. These factors included fasting blood levels of total and LDL-cholesterol, triglycerides, insulin and glucose. In addition, drinking whole milk increased HDL-cholesterol compared to fat-free milk.<sup>1</sup>

<sup>1</sup>Engel, S., Elhauge, M., & T, T. (2018). Effects of whole milk compared with skimmed milk on fasting blood lipids in healthy adults: A 3-week randomized crossover study. *European Journal of Clinical Nutrition*, 72(2), 249-254. doi:10.1038/s41430-017-0042-5

Research suggests that for healthy adults, whole milk, regular cheese and whole milk yogurt can be part of a calorie-balanced, healthy eating plan. This new research should be taken into account when formulating the new DGA.

It is also important that fresh fruits and vegetables continue to be incorporated into the 2020-2025 DGA. New York State is a major producer of fruits and vegetables and are currently ranked second in apples, third in cabbage, third in grapes, ninth in blueberries, just to name a few. It is important that fresh fruits and vegetables remain a priority in the 2020-2025 DGA.

NYFB thanks you for the opportunity to share these comments and appreciate your thoughtful consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "David Fisher". The signature is fluid and cursive, with a large initial "D" and a stylized "F".

David Fisher  
President, New York Farm Bureau