

1320 Research Park Drive
Manhattan, Kansas 66502
(785) 564-6700



900 SW Jackson, Room 456
Topeka, Kansas 66612
(785) 296-3556

Jackie McClaskey, Secretary

Governor Sam Brownback

Secretary Vilsack and Secretary Burwell:

Thank you for the opportunity to review and provide comment on the Scientific Report of the 2015 Dietary Guidelines Advisory Committee (Report). As the report recognizes, at a time when two in three adults in this country is considered to be overweight or obese and nearly half of our nation's adults has a preventable, chronic disease, providing the American people with science-driven dietary guidelines is more important to our nation's wellbeing than ever before. While the Report properly outlines the role of vegetables, fruits, whole grains, and dairy in a healthy American diet, it misrepresents the nutritional and health benefits of lean, red meat. Furthermore, the Report's treatment of the topic of sustainability inappropriately extends beyond the intended scope of the committee as well as the expertise of its members.

The Kansas Department of Agriculture is committed to serving Kansas farmers, ranchers and agribusiness, as well as the consumers they serve, while always keeping a top priority on ensuring a safe food supply and promoting public health. The Kansas Department of Health and Environment's mission is to promote healthy behaviors, policies and environmental changes that improve the quality of life and prevent chronic disease, injury and premature death.

As stated in the Report, the overall body of evidence examined by the committee identified that a healthy dietary pattern includes higher amounts of low- or non-fat dairy. We appreciate that the Report acknowledges the role of dairy foods as a source of calcium, potassium and Vitamin D – nutrients often lacking from the American diet.

We ask the Departments to reconsider the characterization by the committee of red meats in the Report. While the Report outlines a vigorous process for systematically reviewing scientific evidence, the process excluded key, peer-reviewed, research on the role of beef in a healthy diet, including *Beef in an Optimal Lean Diet Study (BOLD)* conducted by researchers at The Pennsylvania University (PSU). Not only is this an oversight, but the Report provides contradictory information about the exact role of red meat in a healthy diet. According to the Report, reducing consumption of red meat is identified as an action for individuals and families to employ to achieve and maintain healthy dietary patterns. However, the Report authors note that lean meats were not consistently defined among the studies referred to in the development of the Report and that lean meats can be a part of a healthy dietary pattern. This type of contradictory information may confuse Americans and actually do more harm to public health than good.

While we disagree with its relegation to a footnote, we agree that lean meat can play an important role in a healthy dietary pattern. According to the findings of the BOLD clinical study, eating lean beef, as part of a heart-healthy diet and lifestyle, can lower LDL "bad" cholesterol. As described in the Report, several nutrients are under consumed by Americans, including iron among adolescent and premenopausal females. A 3-ounce serving of lean beef contributes less than 10 percent of calories to a 2,000-calorie diet, yet it supplies more than 10 percent of the Daily Value for ten essential nutrients, including iron. Additionally, the fat profile of red meat is often misunderstood. Half of the fat in beef is monounsaturated, the same heart-healthy fat in salmon and olive oil. Additionally, one-third of the saturated fat in beef is stearic acid, which has been shown to have a neutral or cholesterol-lowering effect.

Finally, the Report extends egregiously beyond its purview of providing the dietary nutrition evidence and recommendations, for which the assembled panel is qualified, by delving into food and environment sustainability. In doing so, the Report vilifies modern agricultural practices by describing the role of global food production on deforestation, water use, greenhouse gas emissions, and loss of species biodiversity. Make no mistake, conserving the land and its resources is a priority in all segments of American agriculture, as farmers, ranchers, universities, private business, non-profits and all levels of government are working hand-in-hand to implement water and resource conservation efforts, to

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raise healthier animals, to grow improved crop varieties, while always working to provide consumers with food choices they can be confident about feeding to their families. Development of the 2015 dietary guidelines should focus on the role of individual and population dietary choices and leave the work on sustainable and continuously improved food production practices in the hands of those with specific expertise in that area.

As the Departments review the advisory committee's Report and public and agency comments, we ask that you carefully reconsider the scientific evidence on the role of lean meat, including beef, in a healthy diet and commit to publishing dietary guidelines focused on helping Americans achieve a healthy weight, promoting health and preventing disease.

Sincerely,

Jackie McClaskey
Secretary, Kansas Department of Agriculture