



August 13, 2020

Submitted electronically via: www.regulations.gov

The Honorable Alex Azar
Secretary of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

The Honorable Sonny Perdue
Secretary of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Re: Comment on the Scientific Report of the 2020 Dietary Guidelines Advisory Committee (FNS-2020-0015)

Dear Secretary Azar and Secretary Perdue:

On behalf of the National Farm to School Network (NFSN), with more than 200 partner organizations and over 20,000 members, we appreciate the opportunity to comment on the Final Report of the 2020 Dietary Guidelines Advisory Committee. We want to highlight several commendable aspects of this report, and offer that **farm to school and farm to early care and education (ECE) activities provide a proven strategy to help Americans meet the recommended dietary goals**. Farm to school and farm to ECE initiatives promote increased access to health-promoting foods and food education and exposures that influence short-term and long-term health behaviors. Farm to school strategies also provide opportunities to address racial and social disparities in the existing food system that contribute to food insecurity and ongoing injustices in health equity.

Dietary Health Benefits of Farm to School Activities

In particular, the Final Report highlights the growing understanding that early childhood nutritional exposure impacts long-term health directly, through key nutrients, and indirectly through shaping taste preferences and food choices. The Committee notes that, in general, healthy dietary patterns emphasize vegetables, fruits, legumes, whole grains, and seafood, all of which are currently under-consumed by Americans. Farm to school and farm to ECE activities offer proven strategies¹ to increase immediate fruit and vegetable consumption. Research shows participation in farm to school and ECE activities increases

¹ <http://www.farmtoschool.org/Resources/BenefitsFactSheet.pdf>



children's fruit and vegetable consumption by up to 1.3 servings per day. Educational and hands-on activities not only increase students' willingness to choose healthier options at school meals, they also influence healthier food behaviors throughout the lifespan and in home environments.

Holistic View of Dietary Patterns

We applaud the Committee's emphasis on overall dietary patterns rather than nutrients in isolation. Farm to school and farm to ECE activities help kids choose whole, fresh, and unprocessed foods as part of an overall dietary pattern. As the Committee notes, the flexibility within these patterns offers opportunities to incorporate traditional and culturally relevant foods, which connect children with their local food system and strengthen cultural and social connections in the community. Similarly, exploring local and seasonal foods through nutrition education and food service encourages kids to meet the dietary objectives recommended by the Committee within an accessible, culturally relevant frame.

Food Justice and Health Equity Considerations in Dietary Patterns

We commend the Committee for its recognition of the persistent challenge of food insecurity, and encourage USDA and HHS to continue to support programs that provide low-income people with the resources to meet the final recommendations of the Dietary Guidelines for Americans. We knew before the Covid-19 pandemic and the recent Black Lives Matter protests that our food system is rife with racial inequities and that the current public health crisis has only exacerbated them. Our nation's economy and our agricultural system are built on a foundation of racism and exploitation. These inequities in our food system contribute to economic and health inequalities: the same people that provide labor in our food system often can't afford nourishing food for themselves and their families. As a result, Black, Latinx, and Native American communities are significantly more likely to face hunger and food insecurity than White individuals, and to suffer from diet-related diseases like diabetes.

Food System Factors are Key to Dietary Health Objectives

It is disappointing that the Committee chose not to review the food environment, the overall food system, food system sustainability, or strategies for behavior change, given that information about these factors would help USDA and HHS formulate the most actionable guidelines for the public and provide the basis for sound policy implementation that would address health and food system inequities. We concur with the Committee in strongly encouraging the Secretaries of USDA and HHS to examine these topics. We cannot look at healthy dietary patterns in the short term without thinking about how these choices will impact future availability of high quality diets.



The Committee's report reflects a growing understanding of the impact of childhood diet on future health, particularly from ages 0-5 years. We encourage the Secretaries to look to farm to school and farm to ECE activities to provide lifelong positive health impacts as they implement the new Dietary Guidelines for Americans.

Respectfully submitted,

Karen Spangler

Policy Director

National Farm to School Network

karen@farmtoschool.org

(248) 535-3709