



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

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February 10, 2025

Janet M. de Jesus, MS, RD
Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary for Health
United States Department of Health and Human Services
1101 Wootton Parkway, Suite 420
Rockville, MD 20852

Re: Request for Public Comment on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee published December 11, 2024 (2024-29100).

The Washington State Department of Health (DOH) appreciates the opportunity to comment on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee. DOH works to create opportunities for all Washingtonians to make healthy nutrition choices by supporting healthy eating, breastfeeding, access to healthy foods, and physical activity. DOH offers nutrition education through the Women, Infants, and Children Nutrition Program (WIC), and Supplemental Nutrition Assistance Program Education (SNAP-Ed).

The Dietary Guidelines form the foundation for nutrition education programs, and DOH appreciates the advisory committee's emphasis on health equity when analyzing the identified dietary topics. In particular, DOH supports the committee's proposal of new participatory methods and funding mechanisms to build community trust and promote health equity in future research and committee work. Making nutrition recommendations without this lens can risk alienating impacted communities and overlooking effective alternatives to traditionally mainstream dietary patterns.

With this in mind, DOH offers the following feedback for consideration on the committee's report for the Dietary Guidelines:

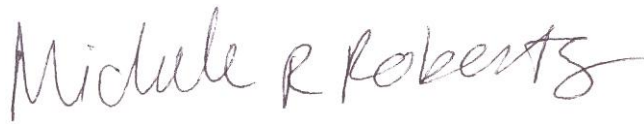
- **Consider reducing emphasis on dairy/soy as a standalone food group.** Americans with lactose intolerance or commonly-occurring dairy/soy allergies as well as those from cultures that do not consume large quantities of dairy milk may be alienated by the report's centering of dairy

and soy as a separate food group.¹ Additionally, while the report grades evidence of the benefits of dairy as “limited,” there is evidence that reducing dairy intake could reduce overall sodium intake, another priority of the report.² Recognizing soy and lactose-free alternatives is a positive step, but de-emphasizing dairy/soy as a category and/or recognizing higher fat dairy options would make the Dietary Guidelines more applicable for a broader population of Americans.

- **Consider alternatives to a focus on “overweight” and “obese” conditions as defined by BMI.** BMI’s limits as a metric have inspired DOH to promote nutrition education centered on reducing diet-related diseases regardless of body size. Promoting weight neutral or Health at Every Size frameworks can carry similar messages while avoiding weight stigma associated with labels such as “overweight” and “obese.”³
- **Consider a more balanced approach to feeding practices recommendations.** DOH believes that the role of structured feeding practices as a group may be overemphasized given the strength of the evidence. DOH agrees with the report that autonomy support feeding practices are “generally understudied” and that more research is needed on practices that strengthen appetite self-regulation and child involvement – two key eating competencies for children that promote a lifetime of healthy eating.

Thank you for considering our response to your request for comment. If you have any questions, please contact DOH’s Federal and Regulatory Affairs Director, Michael Ellsworth at Michael.Ellsworth@doh.wa.gov or Governor Ferguson’s Director of Federal & Inter-State Affairs, Rose Minor at rose.minor@gov.wa.gov

Best,



Michele Roberts, MPH, MCHES
Assistant Secretary
Prevention and Community Health



¹ Food Allergy Research & Education. “Facts and Statistics.” <https://www.foodallergy.org/resources/facts-and-statistics>; Kattan JD, Cocco RR, Järvinen KM. “Milk and Soy Allergy.” *Pediatr Clin North Am*. 2011, 58(2). 2. <https://pmc.ncbi.nlm.nih.gov/articles/PMC3070118/>

² National Academies of Sciences, Engineering, and Medicine. 2017. [Review of WIC Food Packages: Improving Balance and Choice: Final Report](#). Washington, DC: The National Academies Press. 379.

³ Association for Size Diversity and Health. “Health at Every Size® (HAES®) Principles.” <https://asdah.org/haes/>