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Submitted via regulations.gov

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HHS/OASH/ODPHP
1101 Wootton Parkway, Suite 420
Rockville, MD 20852

Re: Comments on Scientific Report of the 2025 Dietary Guidelines Advisory Committee; Docket No. HHS-OASH-2024-0017

Dear Ms. de Jesus,

The American Frozen Food Institute (AFFI) appreciates the opportunity to provide comment to the U.S. Department of Agriculture (USDA) and the U.S. Department of Health and Human Services (HHS) on the 2025 Dietary Guidelines Advisory Committee (DGAC) Scientific Report that will inform the development of the 2025 – 2030 Dietary Guidelines for Americans (DGA). From manufacturers to distributors to suppliers to packagers, AFFI is proud to represent publicly traded and family-owned companies who help produce frozen foods and beverages for today’s food service and retail marketplace and serve as economic pillars within their communities. Throughout the U.S., frozen food sales reached \$85 billion in the last year, and the industry accounts for 670,000 U.S. jobs. As a representative of the frozen food industry, we would like to provide insights into several key areas of the report and emphasize the importance of considering frozen food options as a viable and nutritious component of the American diet. We believe that the final Dietary Guidelines should balance scientific evidence and practical solutions to improve the health of all Americans.

1. Inclusion of Frozen Options in Dietary Guidelines:

Incorporating recommendations to consume frozen foods into the DGA is an important step in promoting broader access to nutritious, convenient, and affordable food options. Encouraging consumption of frozen foods as part of the DGA would reflect an inclusive, flexible approach to dietary guidelines, acknowledging that a variety of food forms—fresh, frozen, and prepared foods—can support health.

Frozen prepared meals, including single and multi-serve entrees, snacks, and side dishes, can contribute significantly to achieving dietary goals, especially for individuals facing time constraints, with limited culinary skills, or residing in food deserts with limited access to grocery stores. Frozen meals provide balanced, portion-controlled servings of vegetables, protein, and grains, helping

consumers stay within energy requirements while consuming nutrient-dense foods. Furthermore, many frozen meals are designed to meet dietary preferences, offering vegetarian, plant-based, or culturally relevant choices, and can be adapted to fit a variety of dietary patterns.

Additionally, frozen vegetables, fruits, legumes, and proteins retain the same high nutritional value as fresh options, offering a convenient and reliable way to meet dietary goals year-round.^{1, 2, 3} Frozen options, available in ready-to-cook forms, provide a consistent and convenient source of essential nutrients like fiber, potassium, and other key vitamins and minerals. These nutrients are crucial for health and as evidenced by the DGAC report, under-consumed by many Americans. The freezing process naturally preserves food by locking in its inherent moisture without requiring added salt or sugar.⁴ This extends shelf life and allows consumers to use only what they need while reducing food waste by keeping the rest for future meals. Their availability supports consumers in incorporating nutrient-dense foods into a variety of meal plans, helping to bridge gaps in nutrient and food group intake and promote balanced, healthy eating and thus should be highlighted by the agencies in the recommendations outlined in the DGA.

As outlined in the scientific report, the DGAC's acknowledgment of frozen vegetables as a valid choice within the vegetable subgroups (e.g., dark green, red/orange, starchy, and other vegetables) is a step in the right direction. Frozen vegetables provide essential nutrients at a lower cost and greater convenience, making them a key resource in achieving the dietary goals outlined in the report. It is critical that frozen versions of beans, peas, and lentils also be reflected as options within the "Beans, Peas, and Lentils" subgroup. While the current report mentions dry or canned beans, frozen options are available and should be included in the final recommendations. Frozen vegetables not only preserve nutrients but also offer greater accessibility for a wider range of populations. As such, we urge the agencies to ensure that the final guidelines fully embrace frozen options as an equal part of a healthy dietary pattern.

2. Impact of Starchy Vegetable Recommendations:

The DGAC's recommendation to reduce starchy vegetable consumption, including frozen starchy vegetables such as potatoes, peas, and corn, has potential unintended consequences for the overall nutritional intake of the American population. Starchy vegetables are a staple in many households, and

¹ Li et al., 2017. *Selected nutrient analyses of fresh, fresh-stored and frozen fruits and vegetables.*

² Bouzari, Holstege, & Barrett, 2014. *Vitamin retention in eight fruits and vegetables: A comparison of refrigerated and frozen storage.*

³ Bouzari, Holstege, & Barrett, 2014. *Mineral, fiber, and total phenolic retention in eight fruits and vegetables: A comparison of refrigerated and frozen storage.*

⁴ Shelke, 2024. *Farm to Freezer: Exploring the science and benefits of frozen foods.*

their consumption plays a vital role in providing key nutrients, such as potassium and fiber, and meeting vegetable intake recommendations. While the report's food pattern modeling suggests that reducing starchy vegetable intake in favor of more beans, peas, and lentils will not affect overall vegetable consumption or micronutrient levels, we have concerns about its impact on actual American diets. Starchy vegetables are good sources of potassium and fiber, and with both classified as nutrients of public health concern, this shift could create unintended gaps in intake. The DGAC's own data analysis highlights starchy vegetables as a leading source of dietary potassium, underscoring the need to carefully evaluate potential consequences before making this recommendation.

The committee's data analysis also reveals that 88% of Americans are not meeting the recommended vegetable intake. Similarly, the 2025 DGAC food pattern modeling data underscores the significant role of potatoes in overall vegetable consumption. Boiled potatoes are the second most consumed single vegetable, while baked potatoes hold the fifth position in terms of total consumption. In contrast, pinto beans are the only type of bean to make it into the top 20 most consumed single vegetables. These data points underscore the ongoing challenge of meeting vegetable recommendations in American diets, with starchy vegetables like potatoes serving as an important and accessible way to increase vegetable consumption.

We caution the agencies that lowering the recommendation for starchy vegetables could unintentionally further reduce the consumption of this nutritious subgroup, exacerbating disparities in meeting overall and subgroup vegetable intake recommendations. Moreover, frozen starchy vegetables—such as frozen potatoes, peas, and corn—are often affordable, shelf-stable, and readily available, making them a practical solution for meeting dietary recommendations.

3. Portion Control and Frozen Foods:

The DGAC's emphasis on portion control is a welcome recommendation, as portion sizes play a significant role in preventing overconsumption and promoting healthier dietary patterns. Pre-portioned frozen entrees provide an important tool for achieving dietary goals, especially for children and adults struggling with portion management. Portioned frozen meals offer a consistent and measurable way to manage calorie intake while still consuming nutrient-dense foods. A 2023 survey of over 1,000 individuals, conducted by Georgetown University, found that half of the respondents choose single-serve frozen meals as a convenient option for healthier eating, particularly due to the portion control they offer.⁵ The growing consumer preference for frozen, pre-portioned

⁵ Portion Balance Coalition. [The Power of Portions](#). Georgetown University McDonough School of Business, 2024.

meals supports the idea that frozen foods can be an effective solution for meeting the dietary needs of all life stages. We encourage HHS and USDA to highlight the role that frozen food options can play in supporting healthier portion sizes.

4. Ultra-Processed Foods (UPFs):

We are encouraged that the DGAC has recognized the significant limitations and inconsistencies in research related to ultra-processed foods (UPFs). The current lack of a clear, standardized definition for UPFs that cannot be operationalized consistently among researchers creates ambiguity and could lead to unfair stigma against food products that are processed to varying degrees. We agree with the DGAC's conclusions regarding the lack of intervention studies, which is a critical gap in the evidence related to UPFs. The DGAC's report highlights the challenges in assessing the health effects of UPFs, citing inconsistent definitions and limited strength of evidence in current research. Additionally, inconsistencies in classifying food products and differing interpretations of processing categories creates flaws in study conclusions, making assessment of the existing evidence base and systematic reviews challenging. We commend the Committee for recognizing the gaps in existing research and for refraining from making premature conclusions about the causal relationship between ultra-processed foods and adverse health effects. We strongly encourage HHS and USDA to incorporate the DGAC's conclusions in the DGA and avoid incorporating stigmatizing language in the dietary guidelines based on a poorly defined construct for which no causal mechanisms have been identified. If future DGAC committees are asked to analyze UPFs and their health implications, we strongly recommend the inclusion of food scientists on the committee to ensure food processing expertise and scientifically sound conclusions.

5. Cultural Inclusivity and Dietary Flexibility:

The DGAC's commitment to dietary flexibility, cultural inclusion, and ensuring that dietary patterns can be adapted to personal preferences is a highly commendable aspect of the report. Frozen foods, with their diverse offerings, are uniquely positioned to support culturally diverse diets. From ethnic cuisine to specialized diets, the frozen food aisle provides a wide range of options that cater to different cultural and dietary preferences. As the 2025-2030 Dietary Guidelines emphasize cultural inclusiveness and flexibility, it is important to highlight that frozen foods can play a crucial role in supporting these diverse needs. Frozen foods offer convenience, affordability, and cultural representation, all of which are integral components of making healthy eating accessible to all Americans.

6. Nomenclature for "Other Vegetables" Subgroup:

We understand the DGAC's suggestion to explore updated nomenclature for the "Other Vegetables" subgroup, which includes a wide range of vegetables such as

asparagus, avocado, brussels sprouts, onions, and cauliflower. This is an opportunity to clarify the categorization of vegetables in a way that accurately reflects the diversity of produce options available in today's food marketplace. We recommend that HHS and USDA include frozen vegetable manufacturers in stakeholder efforts to explore how these vegetables are best categorized and represented. Since many of these vegetables are available in frozen forms, it is important to involve frozen vegetable manufacturers in offering expertise and recommendations on best practices for vegetable categorization, ensuring that all forms of vegetables are adequately represented in the dietary guidelines.

7. Data Integrity of Scientific Report:

The integrity and methodological rigor of the scientific report are critical to ensuring that the future dietary guidelines reflect sound, evidence-based recommendations. A recent evaluation of eight systematic reviews (SRs) conducted by the Dietary Patterns Subcommittee highlights significant concerns about the quality and transparency of the report's methodology and data synthesis, with all SRs rated as "critically low" quality using the AMSTAR 2 tool.⁶ Transparency assessments via PRISMA 2020 and PRISMA-S checklists showed only 74% and 63% compliance, respectively. Errors in search strategies and inconsistencies in narrative data synthesis further highlighted concerns, as searches were irreproducible within a 10% margin of the original results. To strengthen the scientific foundation of the scientific report and future DGAC work, the authors recommend:

- Requiring SRs to meet minimum quality thresholds like AMSTAR 2
- Mandating full adherence to PRISMA guidelines for transparent reporting
- Ensuring reproducibility by standardizing search documentation
- Enhancing narrative synthesis clarity and transparency

Furthermore, a review of the updated dietary pattern recommendations revealed inconsistencies in the vegetable and protein guidance. Specifically, when comparing the total daily vegetable recommendations to the weekly subgroup recommendations, one must multiply the daily recommendation by seven to assess alignment. However, as highlighted in Table 1 below, the total weekly vegetable recommendation does not match the sum of the weekly subgroup recommendations for all calorie levels, highlighting a discrepancy in the outlined guidance. A similar discrepancy is also noted in the protein recommendations highlighted in yellow in Table 2. Additionally, the recommendation for meat, poultry, and eggs in the 2,200-calorie diet is lower than that of the same food group in the 2,000-calorie diet, which appears to be an error. We recommend that the agencies thoroughly review and assess that all data is valid to enhance the reliability and credibility of the DGA's evidence base.

⁶ Bodnaruc et al., 2025. *Reliability and reproducibility of systematic reviews informing the 2020–2025 Dietary Guidelines for Americans: a pilot study.*

Table 1. DGAC Scientific Report Vegetable Recommendations

DGAC Report (Table E.1.2)		Calorie level	1,600	1,800	2,000	2,200	2,400	2,600	2,800	3,000
		Total Veg (Daily)	1.75	2.25	2.25	2.5	2.5	3.0	3.0	3.5
Weekly Rec.	Total Veg (Weekly)	12.25	15.75	15.75	17.50	17.50	21.00	21.00	24.50	
	Dark Green	1.5	1.5	1.5	2.0	2.0	2.5	2.5	2.5	
	Red & Orange	4.0	5.5	5.5	6.0	6.0	7.0	7.0	7.5	
	Starchy	3.0	4.0	4.0	5.0	5.0	6.5	6.5	8.0	
	Other	3.5	4.0	4.0	5.0	5.0	5.5	5.5	7.0	
	Sum of Subgroups	12.0	15.0	15.0	18.0	18.0	21.5	21.5	25.0	

Table 2. DGAC Scientific Report Protein Recommendations

DGAC Report (Table E.1.2)		Calorie level	1,600	1,800	2,000	2,200	2,400	2,600	2,800	3,000
		Total Protein (Daily)	6.00	6.50	7.00	7.0	7.5	7.5	8.0	8.0
Weekly Rec.	Total Protein (Weekly)	42.00	45.50	49.00	49.00	52.50	52.50	56.00	56.00	
	Meat, Poultry, Eggs	23.0	23.0	26.0	24.5	27.0	27.0	29.5	29.5	
	Seafood	8.0	8.0	8.0	9.0	9.5	9.5	10.5	10.5	
	Nuts, Seeds, Soy	4.0	4.0	4.5	5.0	5.5	5.5	5.5	5.5	
	Beans, Peas, Lentils	8.0	10.0	10.0	12.0	12.0	12.0	12.0	12.0	
	Sum of Subgroups	43.0	45.0	48.5	50.5	54.0	54.0	57.5	57.5	

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The American Frozen Food Institute and its members appreciate the thorough work of the committee and the opportunity to provide feedback. We urge HHS and USDA to consider these comments carefully in the development of the 2025-2030 Dietary Guidelines for Americans, ensuring that they reflect the practical realities of American diets, the nutritional benefits of frozen foods, and the need for flexibility and inclusivity.

Respectfully submitted,



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