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Submitted electronically via Regulations.gov

Paul L. Reed
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Office of Disease Prevention and Health Promotion
1101 Wootton Parkway, Suite 420
Rockville, MD 20852

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

Dear Mr. Reed:

The National Chicken Council (NCC) appreciates the opportunity to comment on the *Scientific Report of the 2025 Dietary Guidelines Advisory Committee* (DGAC). NCC is the national, non-profit trade association that represents companies that produce and process more than 95 percent of chicken in the United States. Our members, the health of many Americans, and consumers of chicken all over the world will be negatively impacted by some of the recommendations put forth by the Committee should they be adopted as proposed.

Of particular concern to U.S. chicken producers, and many in the nutrition and health community, are the following three specific Committee recommendations in the report including:

1. The Committee recommends that the proposed Eat Healthy Your Way Dietary Pattern emphasizes dietary intakes of beans, peas, and lentils while reducing intakes of red and processed meats, as supported by systematic reviews as well as food pattern modeling analyses indicating that nutrient goals are generally met with such a shift from the 2020 Healthy U.S.-Style (HUSS) Dietary Pattern to include more plant-based Protein Foods.
2. The Committee also recommends moving Beans, Peas, and Lentils as a subgroup of the Vegetables Food Group to a subgroup of the Protein Foods Group to align with evidence to encourage plant sources of Protein Foods.
3. The Committee also proposes reorganizing the order of the Protein Foods Group to list Beans, Peas, and Lentils first, followed by Nuts, Seeds, and Soy products, then Seafood, and finally Meats, Poultry, and Eggs.

What is of equal concern is what recommendations are not included in the report and, in fact, a recommendation that the DGAC was completely silent on: lean meat, like chicken, can be part of a healthy dietary pattern. We believe these recommendations and omissions are harmful for the health of all Americans, especially those who rely on federal feeding programs – such as the National School Lunch Program (NSLP), Supplemental Nutrition Assistance Program (SNAP), or Special Supplemental

Nutrition Program for Women, Infants, and Children (WIC) — as the Dietary Guidelines directly impact the items that are considered under these programs.

The meat and poultry category is one of the most purchased and consumed food items by SNAP households¹, and chicken is one of the top three most requested meat items at food banks.² Lean meats, like chicken, can help close the protein gap among Americans who struggle with food and nutrient insecurity, which particularly impacts women, children, and older adults who have greater need for nutrient-dense animal-sourced foods, like chicken, to support healthy diets.³

Additionally, the Committee provided no scientific fact or justification to support why the protein subgroups need to be reordered to deemphasize lean meats, like chicken. Doing this gives the false appearance that plant proteins are nutritionally superior to chicken. Further, the report makes no mention of poultry as part of a healthy dietary pattern. Science supports the inclusion of poultry in a healthy diet and without making mention of this fact in the report, this could negatively affect not only federal feeding programs but influence all consumers' decisions.

For these reasons and others mentioned below, we urge the U.S. Department of Health and Human Services (HHS) to reject the three recommendations that emphasize plant-based proteins instead of animal proteins and suggest the reordering of the protein subgroups to emphasize plant-based proteins. We also urge HHS to ensure that the recommendations are based on sound science and robust data which we believe is lacking in the Committee's report. Finally, we request that the report specifically states that lean meat, like chicken, are part of a healthy dietary pattern.

Below is a list of scientific and critically important information that was omitted from the report, yet should most certainly be considered:

- Plant proteins are not nutritionally equivalent to animal proteins from a protein quality and quantity standpoint;
- Nutrients from animal proteins are more bioavailable on a gram per gram basis than plant proteins (iron, zinc, etc.);
- There is a sheer lack of scientific justification for why the protein subgroups need to be reordered to deemphasize lean meats and poultry;
- Animal proteins like chicken help carry nutrient intakes like potassium and intakes of under consumed food groups like vegetables in the diet;
- The recommendations do not consider the flavor and enjoyment of foods. The versatility of chicken brings both to the table over plant proteins; and
- The recommendations stress flexibility and inclusion to maintain a “healthy equity lens” and to be cognizant of “cultural diets” but their recommendations directly contradict this in terms of emphasizing one protein group over another.

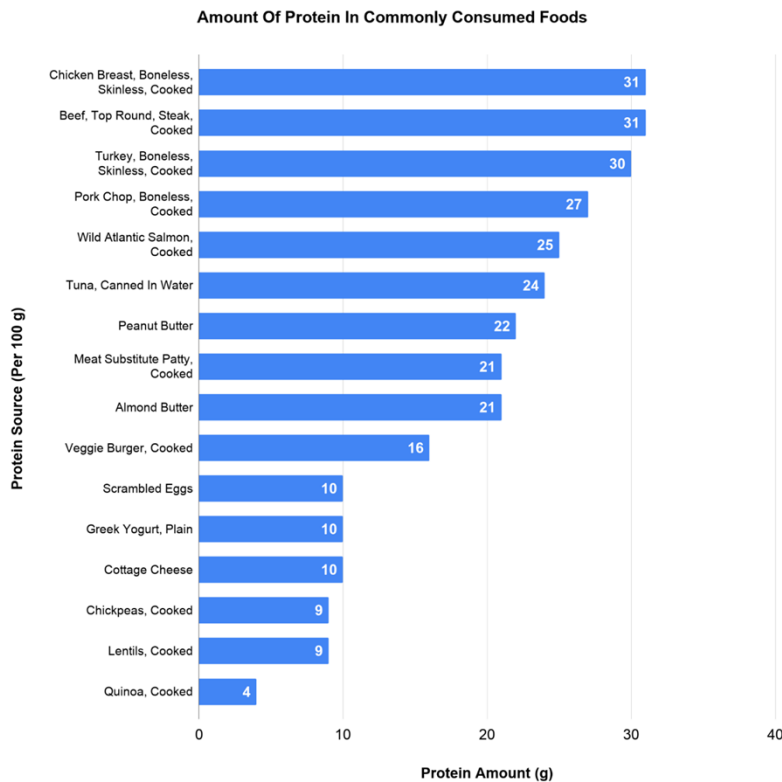
¹ Garasky S, Mbwana K, Romualdo A, Tenaglio A, Roy M. Foods typically purchased by SNAP households. Prepared by IMPAQ International, LLC for USDA, Food and Nutrition Service, November 2016.

² Vincenti M. Three items most requested at food banks. <https://www.feedingamerica.org/hunger-blog/three-itemshungry-families-need>. Published June 22, 2018.

³ Sharpe PA, Whitaker K, Alia KA, Wilcox S, Hutto B. Dietary Intake, behaviors and psychosocial factors among women from food-secure and food-insecure households in the United States. *Ethn Dis.* 2016;26(2):139-146.

Nutritional Benefits of Chicken Consumption

There is a body of evidence pointing to the many health benefits of chicken consumption, including its protein-density and that it provides essential vitamins and minerals like: iron, zinc, and vitamin B12.⁴ Among the many nutritional benefits of chicken consumption include the fact that chicken is a “high-quality” protein. A 3.5-ounce boneless, skinless chicken breast that is roasted contains about 31 grams of protein⁵. However, what makes the protein from chicken stand out compared to many plant-based proteins, is that it is higher-quality, meaning it has enough of each of the nine essential amino acids – the building blocks of protein – that are needed in the human diet.⁶



Source: U.S. Department of Agriculture (USDA), Agricultural Research Service. FoodData Central.

Chicken delivers vital, and frequently under-consumed nutrients of public health importance for all age groups including potassium, vitamin D, iron, and calcium.⁷ There are also important nutrients in dark meat cuts of chicken. While dark meat is slightly higher in calories and fat, it typically contains more

⁴ U.S. Department of Agriculture (USDA), Agricultural Research Service, Beltsville Human Nutrition Research Center. FoodData Central. www.fdc.nal.usda.gov.

⁵ Ibid.

⁶ Marangoni F, Corsello G, Cricelli C, et al. [Role of poultry meat in a balanced diet aimed at maintaining health and wellbeing](#): *Food Nutr Res*. 2015;59:27606.

⁷ U.S. Department of Agriculture (USDA), Agricultural Research Service. Beltsville Human Nutrition Research Center. FoodData Central. www.fdc.nal.usda.gov.

vitamins (e.g., riboflavin, thiamin, and vitamins B6 and B12) and minerals (e.g., iron and zinc) than white meat cuts.⁸ Both dark and white meat chicken are nutritious and can fit into a healthy eating pattern.

Lifestyle changes for better heart health include replacing certain types of fats (like saturated fats or *trans* fats) with sources of healthier fats (like unsaturated fats). In general, red meat has more saturated fat than chicken, and chicken does provide unsaturated fat.⁹ Chicken is also America's favorite low-fat, low-sodium, and low cholesterol, high-quality protein source that fits into the top two heart-healthy diets, the DASH Diet (Dietary Approaches to Stop Hypertension) and Mediterranean diet. Many studies suggest that including lean chicken as part of your eating pattern can lead to a reduction in "bad" LDL cholesterol and total cholesterol, as well as less risk of heart disease.¹⁰ In fact, a recent study on over 1.4 million people who were followed for 30 years did not find a link between eating poultry, such as chicken, and an increased risk of coronary heart disease.¹¹ The researchers believe this could be due to the low amount of saturated fat in lean poultry, which could explain why no relationship with heart disease was found.

Chicken is also high in Vitamin B12.¹² Vitamin B12 is a nutrient that helps keep the body's nerve and blood cells healthy and helps make DNA in the body. Dark and white meat chicken contain vitamin B12, which may promote brain development in children, help the nervous system function properly, and aid cognitive performance in older adults.¹³ 3.5 ounces of skinless dark meat chicken thigh is a good source of the recommended daily value for vitamin B12 (0.42 micrograms).¹⁴

Chicken is a good source of choline.¹⁵ Lean proteins like chicken are important first foods for infants and toddlers (0-2 years old) as sources of iron, zinc, protein, choline, and long chain polyunsaturated fatty acids. Choline is a nutrient that pregnant or lactating women usually do not get enough of but is critical for a child's normal brain development – and chicken provides it. In fact, choline plays a role in good health throughout the lifespan. Young children need choline for continued brain development and

⁸ Ibid.

⁹ Ibid.

¹⁰ Beauchesne-Rondeau E, et al. Plasma lipids and lipoproteins in hypercholesterolemic men fed a lipid-lowering diet containing lean beef, lean fish, or poultry. *The American Journal of Clinical Nutrition*. 2003;77(3):587-593; Feskens EJ, Sluik D, van Woudenberg GJ. Meat consumption, diabetes, and its complications. *Curr Diab Rep*. 2013;13:298–306; Soliman GA. Dietary cholesterol and the lack of evidence in cardiovascular disease. *Nutrients*. 2018;10(6):780; Wolmarans P, et al. Effects of a prudent diet containing either lean beef and mutton or fish and skinless chicken on the plasma lipoproteins and fatty acid composition of triacylglycerol and cholesteryl ester of hypercholesterolemic subjects. *The Journal of Nutritional Biochemistry*. 1999;10(10):598-608.

¹¹ Papier, K., Knuppel, A., Syam, N., Jebb, S. A., & Key, T. J. (2021). Meat consumption and risk of ischemic heart disease: A systematic review and meta-analysis. *Critical Reviews in Food Science and Nutrition*, 63(3), 426–437. <https://doi.org/10.1080/10408398.2021.1949575>.

¹² U.S. Department of Agriculture (USDA), Agricultural Research Service. Beltsville Human Nutrition Research Center. FoodData Central. www.fdc.nal.usda.gov.

¹³ National Institutes of Health. Office of Dietary Supplements Fact Sheet: <https://ods.od.nih.gov/factsheets/VitaminB12-Consumer/>

¹⁴ U.S. Department of Agriculture (USDA), Agricultural Research Service. Beltsville Human Nutrition Research Center. FoodData Central. www.fdc.nal.usda.gov.

¹⁵ National Institutes of Health. Office of Dietary Supplements Fact Sheet: <https://ods.od.nih.gov/factsheets/Choline-Consumer/>.

recent research is even shedding light on the role of choline for impacting mood and preserving cognitive function into adulthood.¹⁶

Health Benefits of Chicken Consumption

In addition to the vast evidence of chicken's nutritional benefits, there is also growing evidence of how eating chicken can positively impact risk factors for certain diseases like cancer and diabetes. Available research suggests that eating more poultry, like chicken, decreases the risk of certain cancers and may be moderately protective against colon, prostate, esophageal, breast, blood (i.e., leukemia), gastric, non-Hodgkin's lymphoma and multiple myeloma.¹⁷ This potential protective effect of chicken consumption will require more observational research to establish how different cuts of chicken and methods of preparation impacts cancer risk factors, morbidity, and mortality.

Multiple studies have found that including lean chicken as part of a healthy eating pattern can lead to a reduction in LDL cholesterol and total cholesterol, as well as lowering risk of heart disease.¹⁸ Findings vary between the studies currently available, but the data shows that eating chicken has a beneficial or neutral effect – meaning that eating chicken does not increase your risk of heart disease or stroke. Finally, consuming enough protein in the diet can help feel full and satisfied, plus help manage blood sugar.¹⁹ The American Diabetes Association (ADA) recommends filling one quarter of your plate with lean protein like chicken.

A new narrative review paper from researchers at Purdue University analyzed 540 studies on everything from how poultry affects body composition in adults, to how eating chicken can impact risk factors for

¹⁶ Ibid.

¹⁷ Daniel CR, Sinha R, Park Y, et al. Meat intake is not associated with risk of non-Hodgkin lymphoma in a large prospective cohort of U.S. men and women. *J Nutr.* 2012;142(6):1074–1080; He Q, Wan ZC, Xu XB, Wu J, Xiong GL. Poultry consumption and prostate cancer risk: A meta-analysis. 2016;4:e1646; Kim SR, et al. Effect of red, processed, and white meat consumption on the risk of gastric cancer: An overall and dose–response meta-analysis. *Nutrients.* 2019;11(4):826; Lo JJ, et al. Association between meat consumption and risk of breast cancer: Findings from the Sister Study [published online ahead of print August 6, 2019]. *International Journal of Cancer.* <https://doi.org/10.1002/ijc.32547>. 2019; Accessed September 13, 2019; Lippi G, Mattiuzzi C, Cervellin G. Meat consumption and cancer risk: A critical review of published meta-analyses. *Critical Reviews in Oncology/Hematology.* 2016;97:1-14; Ma Y, et al. Meat intake and risk of hepatocellular carcinoma in two large US prospective cohorts of women and men [published online ahead of print July 13, 2019]. *International Journal of Epidemiology.* <https://doi.org/10.1093/ije/dyz146>. 2019. Accessed September 12, 2019; Salehi M, Moradi-Lakeh M, Salehi MH, Nojomi M, Kolahdooz F. Meat, fish, and esophageal cancer risk: A systematic review and dose-response meta-analysis. *Nutr Rev.* 2013;71(5):257-67; Sergeantanis TN et al. Meat, fish, dairy products and risk of hematological malignancies in adults—a systematic review and meta-analysis of prospective studies. *Leukemia & Lymphoma.* 2019;60(8):1978-1990; Shi Y, Yu PW, Zeng DZ. Dose-response meta-analysis of poultry intake and colorectal cancer incidence and mortality. *European Journal of Nutrition.* 2015;54:243-50; van den Brandt PA. Red meat, processed meat, and other dietary protein sources and risk of overall and cause-specific mortality in The Netherlands Cohort Study. *European Journal of Epidemiology.* 2019;34(4):351-369; Wilson KM, et al. Meat, fish, poultry, and egg intake at diagnosis and risk of prostate cancer progression. *Cancer Prevention Research.* 2016;9(12):933-941; Zhang Z, et al. Poultry and fish consumption in relation to total cancer mortality: A meta-analysis of prospective studies. *Nutrition and Cancer.* 2018;70(2):204-212.

¹⁸ Ibid.

¹⁹ American Diabetes Association: [What is the Diabetes Plate?](#) January 15, 2025.

cancer and diabetes.²⁰ The current evidence reviewed in [Poultry Consumption and Human Cardiometabolic Health-Related Outcomes: A Narrative Review](#) found that chicken and poultry meat can be a component of an overall healthy eating pattern (for body weight or composition, heart disease, cancer, or type 2 diabetes) as it is a high quality source of protein.²¹ According to the authors of the narrative review, “...chicken and poultry meat can be a component of an overall healthy eating pattern, as it is a high-quality source of protein and provides multiple essential micronutrients.”

The researchers also stressed that chicken provides essential nutrients that are commonly under-consumed, such as minerals magnesium, phosphorous, potassium, selenium, choline, iron, and vitamins such as B-group vitamins including thiamin (B1), riboflavin (B2), niacin (B3), pantothenic acid (B5), pyridoxal (B6), cobalamin (B12), and choline. This is one of the first studies to systematically review the health benefits of chicken on human health outcomes and publish these findings in the scientific literature. The study supports the fact that chicken can be a component of an overall healthy eating pattern. It also suggests that chicken consumption is important for body weight and composition, heart disease, type 2 diabetes, or cancer, as it is a high-quality source of nutrient-dense protein.

Additional Benefits of Chicken Consumption

Beyond the nutritional and health benefits of chicken consumption, chicken is a key part of cultural diets. When chicken is on the plate, it also helps Americans customize and enjoy meals that reflect their personal preferences, cultural traditions, and budgetary considerations.

Flavor, cost, and versatility are the top three characteristics consumers attribute to chicken, meaning chicken can help stretch grocery dollars with many cuts ranking among the most affordable in the meat counter.²² Pairing chicken with whole grains, fruits, vegetables, and dairy foods can increase the intake of key nutrients that otherwise may not be consumed.

Finally, chicken has the least environmental impact of any animal-based protein. With the help of technology, modern breeding, nutrient management, feed conversion, and improved animal husbandry practices, chicken producers in the U.S. have significantly reduced the use of water, farmland, electricity, greenhouse gas emissions, and other valuable natural resources. In fact, producing the same amount of chicken today as 1965 has 50 percent less impact on the environment.²³

Conclusion

For all the reasons mentioned above, we urge HHS to reject all recommendations that emphasize plant-based proteins instead of animal proteins and suggest the reordering of the protein subgroups to emphasize plant-based proteins. We encourage HHS to critically review the recommendations in the report to ensure they are based on sound science and robust data and not driven by an underlying

²⁰ Connolly G, Campbell WW. Poultry Consumption and Human Cardiometabolic Health Related Outcomes: A Narrative Review. *Nutrients*. 2023; 15(16):3550.

²¹ Ibid.

²² The [survey](#) was commissioned by NCC and conducted online by Circana June 22 – 27, 2023, among 520 U.S. adults. Funding was provided by Elanco Animal Health, Evonik Animal Nutrition, NCC, and WATT Global Media.

²³ Putman, Ben, Thoma, Greg, Burek, Jasmina, Matlock, Marty. A retrospective analysis of the United States poultry industry: 1965 compared with 2010. *Agriculture Systems*. 2017; 0308-521X.

agenda among the Committee members. We also urge the agency to specifically state in the final version of the 2025 Dietary Guidelines for Americans that chicken consumption can be part of a healthy eating pattern.

Combined with its nutritional value, positive health benefits, popularity, versatility, affordability, and environmental sustainability, chicken is a pillar of the protein subgroup which should be reflected in the final 2025 Dietary Guidelines for Americans.

Thank you for your consideration as you work to finalize the 2025 Dietary Guidelines for Americans and please feel free to contact us with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ashley B. Peterson". The signature is written in a cursive, flowing style.

Ashley B. Peterson, Ph.D.
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National Chicken Council