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Office of the Assistant Secretary for Health (OASH), HHS
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PBFA Comments on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee

The Plant Based Foods Association (PBFA) is pleased to provide comments on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee (DGAC). PBFA is the first and only trade association in the U.S. representing the plant-based food industry. We currently represent nearly 200 of the nation's leading plant-based food companies.. PBFA and our members are committed to catalyzing a future of food that is more delicious, sustainable, and nutritious for all.

The plant-based foods industry represents $8 billion in retail sales and spans over 20 categories. Our industry is a growing economic force all across the country, creating thousands of U.S. jobs and providing opportunities for American farmers to grow crops like oats, beans, and mushrooms to fuel the quickly expanding global market for plant-based foods.

PBFA supports the overall evidence-based recommendations in the Scientific Report and encourages the U.S. Departments of Health and Human Services (HHS) and Agriculture (USDA to integrate them into the 2025-2030 Dietary Guidelines for Americans. PBFA was pleased to see the Scientific Report's acknowledgement of the overall health benefits of plant-based foods and plant-based diets. Specific comments on the Scientific Report are included below.

Dietary Patterns

PBFA supports the DGAC's description of a healthy dietary pattern, which builds on previous Dietary Guidelines by increasing the emphasis on whole grains and prioritizing plant-based protein sources. We urge HHS and USDA to incorporate the DGAC's recommendation to emphasize beans, peas, lentils, and plant-based sources of protein in the proposed Eat Healthy Your Way dietary pattern. Plant-based proteins are health-supporting, cost-effective, widely available and featured across many cultural eating patterns.

As noted in the Scientific Report, the totality of the evidence supports the health benefits of consumption of vegetable protein sources.[1] [2] Protein and amino acid requirements can be met with plant-based proteins. Soy protein essentially has a Protein Digestibility Corrected Amino Acid Score (PDCAAS) of 1.0 and four more plant proteins (canola, potato, pea, and quinoa) have a PDCAAS of at least 0.75.[3] Additionally, plant proteins differ regarding the amounts of individual amino acids that are present. Consuming a variety of plant-based proteins can support higher indispensable amino acid intakes, which can easily be achieved with the wide variety of plant-based protein foods in the U.S. marketplace.

In the Scientific Report, the Healthy U.S.-Style (HUSS) Dietary Pattern recommendations for protein foods intake are 2 to 7 ounce equivalents per day for individuals ages 2 years and older, depending on energy intake level. Protein was not identified as a nutrient of concern, with mean intake of protein foods at 5.7 oz eq per day among all individuals ages 1 year and older and 57 percent at or above the recommended level. [4] Protein deficiency is not a prevailing concern in the United States and protein requirements can be met through plant-based protein alone if an individual desires, including for those with higher protein needs such as professional athletes.[5],[6]

PBFA urges HHS and USDA to clearly represent the inclusion of plant-based foods and plant-based meals into representations of healthy dietary patterns, including how they can be adapted for different cultures, dietary preferences, and budgets. The newly proposed dietary pattern enhances flexibility and inclusion and can increase the uptake of the Dietary Guidelines, making them more relevant and understandable to consumers.

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[1] Ferrari L, Panaite SA, Bertazzo A, Visioli F. Animal- and Plant-Based Protein Sources: A Scoping Review of Human Health Outcomes and Environmental Impact. Nutrients. 2022 Dec 1;14(23):5115. doi: 10.3390/nu14235115. PMID: 36501146; PMCID: PMC9741334.

[2] Tomé-Carneiro J, Visioli F. Plant-Based Diets Reduce Blood Pressure: A Systematic Review of Recent Evidence. Curr Hypertens Rep. 2023 Jul;25(7):127-150. doi: 10.1007/s11906-023-01243-7. Epub 2023 May 13. PMID: 37178356; PMCID: PMC10224875.

[3] Hertzler SR, Lieblein-Boff JC, Weiler M, Allgeier C. Plant Proteins: Assessing Their Nutritional Quality and Effects on Health and Physical Function. Nutrients. 2020 Nov 30;12(12):3704. doi: 10.3390/nu12123704. PMID: 33266120; PMCID: PMC7760812.

[4] 2025 Dietary Guidelines Advisory Committee. 2024. Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture. U.S. Department of Health and Human Services. https://doi.org/10.52570/DGAC2025

[5] Goldman DM, Warbeck CB, Karlsen MC. Protein Requirements for Maximal Muscle Mass and Athletic Performance Are Achieved with Completely Plant-Based Diets Scaled to Meet Energy Needs: A Modeling Study in Professional American Football Players. Nutrients. 2024 Jun 17;16(12):1903. doi: 10.3390/nu16121903. PMID: 38931258; PMCID: PMC11206900.

[6] Goldman DM, Warbeck CB, Karlsen MC. Completely Plant-Based Diets That Meet Energy Requirements for Resistance Training Can Supply Enough Protein and Leucine to Maximize Hypertrophy and Strength in Male Bodybuilders: A Modeling Study. Nutrients. 2024 Apr 10;16(8):1122. doi: 10.3390/nu16081122. PMID: 38674813; PMCID: PMC11054926.

Milk Recommendations

PBFA supports the continued inclusion of unsweetened soy beverages in the Dietary Guidelines and encourages HHS and USDA to consider the important role additional plant-based milks could play in improving intake of nutrients of concerns and overall adhere to the Dietary Guidelines. The DGAC noted that plant-based milks have similar or higher quantities of calcium and vitamin D, both nutrients of concern, compared to fat-free milk. Their final exclusion of plant-based milks due to the variation in the nutrient composition in the market effectively precludes a readily available and highly acceptable source of these important nutrients for millions of Americans, including the 30 to 50 million Americans who are lactose intolerant.[7] Consumption of fluid cow's milk by Americans continues to decline. Limiting an entire category of plant-based milks because it is a rapidly growing and evolving market, essentially disregards a nutritious and desirable alternative to dairy milk. Plant-based milk companies have been proactive in providing products that are desired by consumers and align with nutrient recommendations. These beverages should be included in the 2025 Dietary Guidelines.

Future Research Needs

PBFA supports the DGAC's identification of future research needs, including support for NHANES to fully capture the U.S. population, including different population groups and life stages. Additionally, PBFA and the plant-based industry look forward to working with the agencies to update national food composition databases to keep pace with the ever-evolving food supply.

Conclusion

PBFA commends the DGAC for their commitment to a transparent and evidence-based process for developing their Scientific Report. We encourage HHS and USDA to incorporate their recommendations for increasing consumption of plant-based foods and encourage the further addition of plant-based milks to the 2025 Dietary Guidelines.

PBFA stands ready to support additional research and encourage food industry innovation to support consumers in having access to delicious, sustainable and nutritious foods that will help them achieve the recommendations in the Dietary Guidelines.

Regards,

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Plant Based Foods Association

[7] *Lactose intolerance*. Lactose Intolerance | Boston Children's Hospital. (n.d.). https://www.childrenshospital.org/conditions/lactose-intolerance#:~:text=A%20lack%20of%20lactase%20can,Native%20Americans%20are%20lactose%20intolerant