



**University of
California Research
Consortium on
Beverages and Health**

February 7, 2025

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

Re: Docket HHS-OASH-2022-0021, 2025 Dietary Guidelines for Americans Committee

Dear Ms. de Jesus,

The University of California (UC) Research Consortium on Beverages and Health respectfully submits the following comment on the topic of beverages to the U.S. Departments of Agriculture (USDA) and of Health and Human Services (HHS) as they work to develop the 2025-2030 Dietary Guidelines for Americans and associated consumer-facing information.

Formed in 2018, the Consortium works to decrease consumption of sugary drinks and to increase consumption of water instead, throughout the UC system as well as at state and national levels. Our ad hoc group, consisting of faculty across the UC campuses, many of whom are nationally prominent in relevant disciplines, does this by conducting and disseminating cutting edge research.

We support evidence-based Dietary Guidelines for Americans (DGAs). Given the 2025 Dietary Guidelines Advisory Committee (DGAC) Report recommendations, we respectfully suggest that this is the time for USDA and HHS to take significant action to help and encourage Americans to choose plain water as their primary beverage and reduce consumption of sugar-sweetened beverages. We strongly urge that advice to drink water as the primary beverage should be clearly communicated in the 2025-2030 Dietary Guidelines for Americans. Specifically, we recommend that,

- **HHS and USDA act on the 2025 DGAC Report recommendation that says, “The Committee suggests that 2025-2030 edition [of the Dietary Guidelines for Americans] specifically**

recommend plain drinking water as the primary beverage for people to consume.”¹ The new DGAs should state this clearly and frequently in all guidance for ages 2 and over and in all consumer-facing materials.

- **USDA take the necessary steps to add a symbol for water to the nutritional guidance graphic.** This graphic, currently “MyPlate,” is the main translation of the DGAs for the public and the nation’s primary nutrition education tool in schools, childcares, SNAP-Ed and more.
 - In its Report to Congress, the National Clinical Care Commission states, “USDA should add a symbol for drinking water to the MyPlate graphic and increase water promotion messaging in all consumer-facing materials issued by its Center for Nutrition Policy Promotion. Water is not currently depicted on the USDA MyPlate.”²

Support for these two recommendations follows.

Water as the Primary Beverage. We believe there is ample support for our recommendations in the 2025 Dietary Guidelines Advisory Committee (DGAC) Report. For example, the Report Executive Summary states:

These findings support existing general recommendations for beverage consumption provided in the Dietary Guidelines, which emphasize consuming water and beverages that contribute beneficial nutrients, such as fat-free and low-fat milk and 100% juices; and reducing intake of beverages (e.g., SSB) that contain calories while contributing limited or no beneficial nutrients. **The Committee suggested enhancements to existing recommendations, including an emphasis on plain drinking water as the primary beverage for people to consume, specificity regarding unsweetened fat-free and low-fat dairy milk and unsweetened fortified soy beverages, and clarifying that SSB consumption should be limited.** (Executive Summary, pg. 5)

We note and support the following specific recommendations related to water and SSBs in the DGAC Report:

- “The Committee suggests that the 2025-2030 edition specifically recommend plain drinking water as the primary beverage for people to consume.” (Part D, Chapter 3, p. 17)
- “For SSB and other beverages that contain added sugars with minimal or no beneficial nutrients, recommendations should state to limit intakes rather than to reduce/decrease them.” (Part D, Chapter 3, p. 18)
- “Given continuing questions and uncertainty about the long-term effectiveness of LNCSB [low- and no-calorie sweeteners in beverages] for weight management, emphasis should be on consumption of water and nutrient-dense beverages. This is particularly important for children; a consensus statement from AND, AAPD, AAP, and AHA recommends that children younger than 5 years not consume LNCSB.” (Part D, Ch. 3, p. 18)

¹ 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>. Part D, Chapter 3, pp. 16-17.

² National Clinical Care Commission. 2022. *Report to Congress on Leveraging Federal Programs to Prevent and Control Diabetes and Its Complications, 2021*. Chapter 4. Population-Level Diabetes Prevention and Control. At <https://health.gov/about-odphp/committees-workgroups/national-clinical-care-commission/report-congress>, pages 38-41.

- “The next edition of the Dietary Guidelines for Americans should clearly state that water and nutrient-dense beverages should be the primary beverages consumed during pregnancy and lactation.” (Part D. Ch. 3: Beverages, pg. 18)
- “Oral health and nutrition have a bidirectional relationship. Dietary behaviors that may contribute to dental health include consuming foods and beverages that are low in sugar or acid, meeting calcium recommendations, drinking fluoridated water, and limiting alcohol intake.” (Part D. Ch. 1, pg. 41)

Water on MyPlate. The addition of a symbol for water on the nutritional guidance MyPlate graphic has been promoted by leading public health professionals and organizations, including in letters on this issue submitted to the Dietary Guidelines Advisory Committees of 2014³ and 2020,⁴ and to USDA and HHS in 2020.⁵ A bipartisan group of sixty-nine members of the House of Representatives sent a letter to USDA and HHS making this request in 2019.⁶ In spring 2024, sixty members of both parties in the House and Senate sent letters to USDA and HHS, letting them know that members of Congress would like to see the agencies add a symbol for water to MyPlate, the U.S. dietary guidance graphic.⁷

In addition, we observe that many comments recommending actions to enable drinking water were submitted in the recent public comment period to the DGAC (Federal Register Docket HHS-OASH-2022-0021). Other nations have already recognized the need to incorporate drinking water into their dietary guidance graphic;⁸ 80 countries include some type of symbol or icon for drinking water in their guidance graphic.⁹ These support the timeliness of decisive actions by your agencies to promote drinking water in place of sugary drinks.

We further note that substitution of water for sugary drinks supports two additional areas of increasing public and scientific concern: strategies to reduce ultra-processed foods (UPFs) in the diet, and the sustainability of American food patterns. Research suggests that most added sugars intake in the US diet is from UPFs and among those, the leading sources of added sugars were SSBs.¹⁰ Drinking water is a more sustainable choice than SSBs because its production uses less water and emits fewer greenhouse gases.¹¹ As of 2022, 37 countries—including the majority of high-income countries—explicitly used environmental sustainability as a guiding principle in their government-endorsed dietary guidelines.¹²

³ Ritchie LD et al. 2014. *Letter to Chairwoman Millen and Members of the Dietary Guidelines Advisory Committee.* At, <https://npi.ucanr.edu/files/207504.pdf>

⁴ National Drinking Water Alliance. 2020. *Letter to Chairwoman Schneeman and Members of the 2020 Dietary Guidelines Advisory Committee.* At, <https://ucanr.edu/sites/NewNutritionPolicyInstitute/files/318141.pdf>

⁵ National Drinking Water Alliance. 2020. *Letter to USDA and HHS.* At, <https://ucanr.edu/sites/NewNutritionPolicyInstitute/files/332232.pdf>

⁶ Members of Congress. 2019. *Letter to Secretaries Azar and Purdue.* Available at, https://docs.wixstatic.com/ugd/9c073b_2d7590f8a6924a9b82f261075c4da7fc.pdf

⁷ Members of Congress. 2024. *Letter to Secretaries Becerra and Vilsack.* Available at, <https://crockett.house.gov/sites/evo-subsites/crockett.house.gov/files/evo-media-document/Add%20Water%20Graphic%20To%20MyPlate%20Letter.pdf>

⁸ Herforth A, Arimond M, Álvarez-Sánchez C, Coates J, Christianson K, Muehlhoff E. 2019. A Global Review of Food-Based Dietary Guidelines. *Adv Nutr.* **10**(4):590-605.

⁹ 2025 International Council of Bottled Water Associations. *Global Water Consumption Guidelines.*

At, https://bottledwater.org/wp-content/uploads/2025/02/Global-Water-Consumption-Guidelines-2025_final.pdf

¹⁰ Martínez Steele E, Baraldi LG, Louzada MLDC, et al. Ultra-processed foods and added sugars in the US diet: evidence from a nationally representative cross-sectional study. *BMJ Open* 2016; **6**:e009892.

¹¹ Meisterling K et al. 2022. Healthy beverage initiatives: A case study of scenarios for optimizing their environmental benefits on a university campus, *Cleaner and Responsible Consumption*, 4:100049

¹² James-Martin G, Baird DL, Hendrie, GA, Bogard J, Anastasiou K et al. 2022. Environmental sustainability in national food-based dietary guidelines: a global review. *The Lancet Planetary Health*, **6**(12): e977 - e986.

Thank you for this opportunity to provide public comment as your agencies develop both the 2025-2030 Dietary Guidelines for Americans and ancillary consumer-facing products. Please contact us if we can provide further information.

Sincerely,

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