Congress of the United States

Washington, DC 20510

November 1, 2023

Janet M. de Jesus, MS, RD
Designated Federal Officer, 2025 Dietary Guidelines Advisory Committee
HHS/OASH Office of Disease Prevention and Health Promotion (ODPHP)
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Jackie Haven
Designated Federal Officer, 2025 Dietary Guidelines Advisory Committee
Deputy Administrator
USDA/FNS Center for Nutrition Policy and Promotion
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Re: Docket No. OASH-2022-0021-0001, Comments on the 2025 Dietary Guidelines Advisory Committee

Dear Ms. De Jesus:

As Congressional champions for Americans with food allergies, we write to urge the Dietary Guidelines Advisory Committee (DGAC) to include in its Scientific Report a review of the evidence regarding early introduction of common allergens in the dietary recommendations for birth through 24 months of age. Given the significant burden of food allergies on Americans, and their increasing prevalence, it is imperative that the DGAC use its platform to highlight the latest science on food allergy prevention, helping Americans to live safer and healthier lives. We appreciate the opportunity to comment on the important work of the DGAC as it undertakes its scientific review to aid in the development of the Dietary Guidelines for Americans (DGA) that occurs every five years.

Food allergies impact an estimated 33 million people in the United States, including 5.6 million U.S. children, or about 1 in 13 kids. Food allergies can be severe and life-threatening, resulting in approximately 200,000 individuals requiring emergency medical treatment annually.[1] More concerning, the incidence of food allergies is skyrocketing—the Centers for Disease Control & Prevention (CDC) reports that the prevalence of food allergy in children increased by 50 percent between 1997 and 2011.[2] However, a growing body of evidence provides hope that this trend

[1] Food Allergy Research & Education (FARE) (2023). Facts and Statistics. FARE. Available at https://www.foodallergy.org/resources/facts-and-statistics

[2] Jackson KD, Howie LD, Akinbami LJ (2013). Trends in Allergic Conditions Among Children: United States, 1997-2011. NCHS data brief, no 121. Hyattsville, MD: National Center for Health Statistics. Available at https://www.cdc.gov/nchs/products/databriefs/db121.htm

may be reversed – studies have indicated that early introduction of potential allergens may prevent development of food allergies.

For example, the groundbreaking Learning Early about Peanut Allergy (LEAP) trial demonstrated reduction in development of peanut allergy by over 80 percent in children who were exposed to foods containing peanut starting at age 4-10 months.[3] This research, and additional studies that followed, spurred a radical shift in infant feeding recommendations from major groups. In 2016, the National Institute of Allergy and Infectious Diseases (NIAID) published Addendum Guidelines for the Prevention of Peanut Allergy in the United States, Report of the NIAID-Sponsored Expert Panel (Addendum Guidelines) recommending that infants across levels of risk should be introduced to age-appropriate peanut-containing foods starting around 4-6 months of age.[4] The American Academy of Pediatrics (AAP) has also endorsed guidelines recommending early introduction of peanut protein for infants.[5]

Evidence has also accumulated in favor of early introduction of egg into infants' diets. In 2021, the American Academy of Allergy, Asthma, and Immunology; the American College of Allergy, Asthma, and Immunology; and the Canadian Society for Allergy and Clinical Immunology published joint guidance following a literature review of available evidence on early introduction. The groups recommended introducing peanut-containing and egg-containing products to all infants starting around age 6 months.[6]

Research demonstrating the benefits of early introduction, and the guidance that followed, represents a reversal of long-held belief that parents should delay introducing peanuts and other common allergens into their children's diets. Given the potential harms of following this older guidance, policymakers, health care providers, public health workers, and advocates should be aware of this new research by incorporating it into key nutritional guidance for Americans, notably, the DGA.

As you know, the 2020-2025 edition of the DGA was expanded to cover, for the first time, dietary recommendations for birth through 24 months of age.[7] We were pleased to see the 2020-2025 DGA included a recommendation on early introduction of peanut to reduce the risk of developing peanut allergy based on the NIAID Addendum Guidelines. In addition, the prior DGAC Scientific Report recommended inclusion of both egg and peanut as having sufficient evidence to be covered in the 2020-2025 DGA.[8]

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[3] Du Toit G, Roberts G, Sayre PH, Bahnson HT, Radulovic S, Santos AF, et al. Randomized trial of peanut consumption in infants at risk for peanut allergy. N Engl J Med 2015;372:803-13. doi:10.1056/NEJMoa1414850.
[4] National Institute of Allergy and Infectious Diseases (NIAID). 2016. *Addendum Guidelines for the Prevention of Peanut Allergy in the United States, Report of the NIAID-Sponsored Expert Panel***.** Available at https://www.niaid.nih.gov/sites/default/files/addendum-peanut-allergy-prevention-guidelines.pdf.
[5] Sicherer, SH. New guidelines detail use of 'infant-safe' peanut to prevent allergy. AAP News 2017. Available at https://publications.aap.org/aapnews/news/12250?autologincheck=redirected
[6] Fleischer DM, Chan ES ,Venter C, Spergel JM, Abrams EM, Stukus D, et al. A Consensus Approach to the Primary Prevention of Food Allergy Through Nutrition: Guidance from the American Academy of Allergy, Asthma, and Immunology; American College of Allergy, Asthma, and Immunology; and the Canadian Society for Allergy and Clinical Immunology. JACI: In Practice 2021;9(1):22-43. Available at https://doi.org/10.1016/j.jaip.2020.11.002
[7] U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans, 2020-2025. 9th Edition*. December 2020. Available at DietaryGuidelines.gov.

Nonetheless, as we have been monitoring the ongoing work of the 2025-2030 DGAC, we note that it has not included evaluation of current science on early introduction in the diet of infants to prevent food allergy as a research question. We are concerned that the DGAC may not be continuing to evaluate the benefit of early introduction of food allergens and building on its previous recommendations based on the growing body of scientific evidence, which could result in an updated DGA that does not reflect the most current science. We urge the DGAC to thoroughly evaluate the total body of evidence on early introduction of food allergens to prevent development of food allergies. Early introduction of food allergens is critical to reducing the development of food allergies and their often life-long burden.

We look forward to your prompt response. Thank you for your time and attention to this crucial matter.

Sincerely,

Doris Matsui
Member of Congress

Mike Gallagher
Member of Congress

Gerald E. Connolly
Member of Congress

Nancy Mace
Member of Congress

Mark DeSaulnier
Member of Congress

Paul Tonko
Member of Congress

[8] Dietary Guidelines Advisory Committee. 2020. *Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Agriculture and the Secretary of Health and Human Services.* U.S. Department of Agriculture, Agricultural Research Service, Washington, DC. Available at https://doi.org/10.52570/DGAC2020.

Dean Phillips
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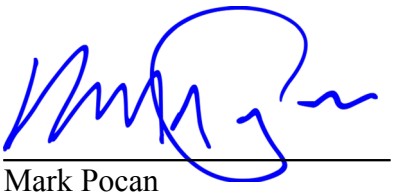

Mark Pocan
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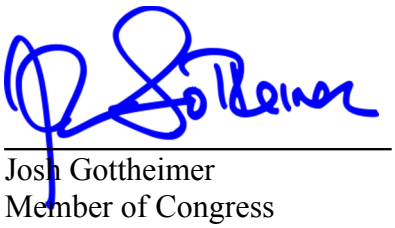

Josh Gottheimer
Member of Congress

cc:
The Honorable Xavier Becerra, Secretary, Department of Health and Human Services
The Honorable Tom Vilsack, Secretary, Department of Agriculture