



August 13, 2020
The Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20024

The Honorable Alex Azar
Secretary of Health and Human Services
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Docket ID: FNS-2020-0015
Submitted via Regulations.gov

Dear Secretaries Perdue and Azar,

On behalf of the members of the Oklahoma Cattlemen's Association (OCA), thank you for the opportunity to provide comments on the Scientific Report of the 2020 Dietary Guidelines Advisory Committee. The OCA is the largest and oldest cattle farmer and rancher organization in Oklahoma with members in all 77 Oklahoma counties. OCA members work hard daily raising high quality, nutritious and wholesome beef to nourish families around the world. Our members take very seriously this responsibility and guard closely the identity of quality, safe and wholesome beef.

There are several specific recommendations OCA regarding the proposed guidelines. First, beef is a unique dense source of key nutrients needed at all life stages, including early year physical development. Beef is an excellent source of protein, vitamin B-12, zinc, selenium, niacin and vitamin B-6. Additionally, beef is a good source of the nutrients phosphorus, riboflavin, iron and choline. As the guidelines address life stage nutrition, beef fits well into all phases of growth and development.

Second, the dietary guidelines should avoid considerations that fall outside the nutrient scope such as sustainability of food supply and, in the case of animal proteins, management practices. While Oklahoma cattle producers welcome opportunities to highlight the wonderful environmental and animal management practices used to raise our wholesome beef, these topics fall well outside the boundaries of the parameters established by Congress for the Dietary Guidelines.

Finally, it is important to recognize the nutrient power of beef as compared to other protein sources. Many plant-based protein products require significant quantities of consumption to equal the nutrients found in lean beef which leads to overconsumption of nutrients such as sodium because these products are so heavily processed in many cases. Beef is naturally nutrient dense fitting very well into reasonable calorie-oriented diet considerations for all Americans.

Thank you for the opportunity to provide comments.

Sincerely,

Michael Kelsey
Executive Vice President