IDF has taken note of the FAO/WHO sustainable healthy diets guiding principles based on the proposed definition that sustainable healthy diets are dietary patterns that promote all dimensions of individuals health and wellbeing; have low environmental pressure and impact; are accessible, affordable, safe and equitable; and are culturally acceptable. These principles translate this concept into clear non-technical information and messaging to be used by governments and other actors in policymaking and communications.

We appreciate the recognition of the role dairy plays in sustainable healthy diets as outlined in the document, as well as the need to focus on foods and dietary patterns instead of a solely focusing on individual nutrients. We disagree with the recommendation that suggest optionality rather than necessity for dairy. Classifying dairy with other sources of protein misses the point about the broader nutritional value of dairy products, particularly their affordability as a source of a variety of nutrients.

Process

We are concerned by the process of how these principles were developed without public or member state consultation.

The document states that the principles are food based and consider nutrient recommendations while considering environmental, social/cultural and economic sustainability. We applaud that all dimensions of sustainability are taken into consideration, but we strongly question the reductionist approach of looking at health solely through a nutrient approach and not including actual disease risk related to total diet and to food pattern.

We, therefore, recommend a broader consultation is required to agree on these definitions and the scientific evidence supporting these principles before these principles are included in any UN report or resolutions.

Role of dairy in healthy diets

The document addresses territorial diets as they have health imparting characteristics, and in addition these diets might have a pivotal role in supporting the transition towards more sustainable agriculture and food systems. Two types of diets are emphasized the Mediterranean diet, and the New Nordic Diet, both of which include dairy.

Based on the FAO database on dietary guidelines 94 countries have dietary guidelines with 100% of them advising the consumption of dairy. This is in support of the overwhelming evidence that the consumption of milk, cheese and yoghurt are part of healthy dietary patterns and are associated with positive health outcomes.
Milk and dairy foods are well-known for being naturally nutrient-rich, providing an abundant supply of high-quality protein, calcium, phosphorus, potassium, iodine, and vitamins B2 and B12.

The unique package of essential nutrients contained in dairy products contributes to the prevention of all forms of malnutrition; and are associated with better growth in children, micronutrient status, cognitive performance and motor function development \( ^v \). With regard to the association of dairy consumption and non-communicable diseases, a growing evidence base supports a null or inverse association between dairy consumption and incidence of obesity, type 2 diabetes, stroke, certain cancers and cardiovascular disease \( ^v i v i i v i i i \).

**Dairy matrix**

It is increasingly recognized that the effects of milk and dairy foods on health extend beyond the benefits of the individual nutrients they contain. This has been characterised by an eminent group of researchers as a ‘food matrix’ effect \( ^i x \). It is the unique combination of nutrients and bioactive factors, and how they interact with each other within the dairy matrix, that combines to produce an overall effect on health. For example, there is some evidence that the calcium in milk provides longer lasting skeletal benefits because of its beneficial calcium-phosphorus ratio and that the calcium and protein in dairy lead to positive results for bone health.

**Sustainability**

Environmental, social, and economic aspects of sustainability are collectively important to understand broad implications of sustainable healthy diets and to avoid possible unintended consequences of well-intentioned dietary guidance.

All food production incurs varying environmental “costs”, but it is important to consider those costs in the context of the nutritional “dividends” provided by the food. It is imperative that nutrient density and the nutritional and health benefits of dairy are considered as essential aspects of environmental sustainability.

Dairy is not just a simple food product: it is woven into the fabric of almost every nations’ society. 1 billion people globally are directly or indirectly supported by the dairy industry, Dairy farming, is in most places small to medium enterprises that are an integral part of the local community.

The versatility and affordability of milk and dairy products allows for varied use and incorporation into various dietary patterns and across different cultures. Dairy products themselves form part of a high proportion of meal and food occasions and form part of social gatherings and bonding experiences.

**Conclusion**

Dairy products play a crucial role in making whole diets healthy and therefore help to meet the SDGs. The dairy community supports the goals of promoting healthy diets within sustainable food systems as a feasible solution to sustainably producing enough food for 10 billion people by 2050, but does not support unscientific and unnuanced recommendations that restrict healthy and nutritious options, such as dairy foods.

Policy that endeavors to improve the health of the people and the planet should be grounded in sound science, carefully and thoughtfully implemented, and acknowledge the unique nutritional, economic and social contributions that dairy foods make.


v CUP. World Cancer Research Fund, 2018; https://www.wcrf.org/dietandcancer/exposures/meat-fish-dairy

