

American Fruit and Vegetable Processors and Growers Coalition

March 30, 2018

Mr. Brandon Lipps
Administrator
Food, Nutrition & Consumer Services
United States Department of Agriculture

Mr. Donald Wright
Deputy Assistant Secretary for Health
Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary for Health
United States Department of Health and Human Services

Filed electronically at: <https://www.regulations.gov/document?D=FNS-2018-0005-0001>

RE: Dietary Guidelines for Americans Request for Comments on Topics and Questions: (Docket ID: FNS-2018-0005)

Dear Administrator Lipps and Deputy Assistant Secretary Wright:

The American Fruit and Vegetable Processors and Growers Coalition (AFVPGC) appreciates this opportunity to provide comments on the Dietary Guidelines for Americans (DGA) to the U.S. Department of Agriculture and the U.S. Department of Health and Human Services (the Agencies).

AFVPGC is the national coalition comprised of family farm growers of fruits and vegetables that are grown for processing, suppliers, canners and the food processors who prepare those products for retail distribution and sale in the United States. Food manufacturing plants transform raw agricultural materials into products for intermediate or final consumption by applying labor, machinery, energy, and scientific knowledge. These plants account for 14.7 percent of the value of shipments from all U.S. manufacturing plants and fruit and vegetable processing comprises 8% of that sector. The can industry accounts for the annual domestic production of approximately 124 billion food, beverage and other metal cans; which employs more than 20,000 people with plants in 33 states and Puerto Rico; and generates about \$13.3 billion in direct economic activity.

AFVPGC thanks the Agencies for organizing the development of the 2020-2025 DGAs around investigating specific research questions. AFVPGC proposes that evidence be reviewed around the following topic. The research questions under this topic are important because it is not directly studied by the Dietary Guidelines Advisory Committee (DGAC) yet recommendations around this topic still appear in the policy document.

PROPOSED TOPIC: Role of all forms of fruits and vegetables (fresh, frozen, canned, dried, 100% juice) in achieving fruit and vegetable recommendations

QUESTIONS: Do canned, frozen and dried fruits and vegetables significantly contribute to the intake of salt, sugar and fat? Is the limiting language (e.g., “no added salt”) included in current dietary guidance around these foods substantiated by evidence? How do various forms of fruits and vegetables affect consumption in all life stages?

for questions, contact the Coalition Coordinator, Denise Bode dabode@michaelbeststrategies.com
office-202.844.3804 cell-405-818-1775

AFVPGC 4600 American Parkway #210.Madison, WI 53718 608-255-9946 office

Relevance: Currently the 2015 DGA recommends all forms of fruits and vegetables, yet it includes additional limiting language such as “with no salt-added” and “no-sugar-versions.”¹ However, the recommendations are not based upon actual consumption of salt, sugar and fat attributed to these foods. For example, vegetables only contribute about seven percent of sodium intake (inclusive of French fries), and fruit, fruit juice and vegetable intake combined contribute only two percent of added sugar.² Such limiting language has a direct effect on regulations governing federal feeding programs, yet there is little research to support its presence in the guidelines.

Importance: The gap in fruit and vegetable consumption continues to be of concern in America, with only one in ten adults meeting the recommendations.³ The importance of fruit and vegetable intake has been studied extensively and the body of literature does not need to be reevaluated. However, the DGAC has not adequately considered the role of all forms (e.g., fresh, frozen, canned, dried and 100% juice) in helping Americans in all life stages achieve consumption goals and nutrient adequacy, nor has it substantiated the limiting language around all forms of fruits and vegetables with evidence. At a time when fruit and vegetable consumption is so low, increased attention to the communication and translation of these guidelines is imperative for increasing consumption of fruits and vegetables.

Potential Federal Impact: Language in the DGA such as “no sugar added” or “no salt added” has a large impact on federal feeding and grant programs: often, only canned and frozen fruits and vegetables with no “added sugar, fat or salt” are allowed to be offered in The Special Supplemental Nutrition Assistance Program for Women Infants and Children or through Food Insecurity Nutrition Incentive grants. The intention of government assistance programs is to make healthy food more accessible to low-income individuals as part of a bridge to self-sufficiency, yet the current language limits the number of fruits and vegetables available to participants and communicates, and inaccurately portrays that some forms are more valuable than others. Messaging with “inclusive” language that encourages all forms of fruit and vegetables more strongly and consistently increases consumers’ intent to purchase packaged fruits and vegetables, without decreasing intent to purchase fresh produce. From both a regulatory and behavioral perspective, inclusive language would greatly widen the fruit and vegetable options to these individuals, without sacrificing nutrition.⁴

Avoiding duplication: The issue of limiting language is not currently addressed through existing evidence-based federal guidance.

Finally, AFVPGC asks that the Agencies please move forward in a transparent fashion and update stakeholders as often as possible about the timeline and what changes to expect, and not to expect, in the 2020-2025 DGA process. In particular, we are hoping you could please inform stakeholders on how topics that are not being re-evaluated by the scientific advisory committee will be incorporated into the 2020-2025 policy document or scientific report.

¹ U.S. Department of Health and Human Services and U.S. Department of Agriculture. 2015–2020 Dietary Guidelines for Americans. 8th Edition. December 2015. Available at: <http://health.gov/dietaryguidelines/2015/guidelines/>; page 21, 55, 58

² U.S. Department of Health and Human Services and U.S. Department of Agriculture. 2015–2020 Dietary Guidelines for Americans. 8th Edition. December 2015. Available at: <http://health.gov/dietaryguidelines/2015/guidelines/>.

³ Seung Hee Lee-Kwan, PhD; Latetia V. Moore, PhD; Heidi M. Blanck, PhD; Diane M. Harris, PhD; Deb Galuska, PhD. Disparities in State-Specific Adult Fruit and Vegetable Consumption — United States, 2015. Morbidity and Mortality Weekly Report. November 17, 2017; 66(45):1241–1247. Available at: https://www.cdc.gov/mmwr/volumes/66/wr/mm6645a1.htm?s_cid=mm6645a1_w

⁴ Produce for Better Health Foundation. The Impact of Policy Recommendation with Limiting and Inclusive Language on Consumers Perceptions and Intent to Purchase Fresh and Packaged Forms of Fruits and Vegetables. Consumer Message Testing Research. October 2015. Available at: http://pbhfoundation.org/sites/default/files/pdf/Limiting_Inclusive_Language_Consumer_Research_10.21.15_1449586538.pdf

Thank you for the opportunity to provide comment on the development of the DGAs. If you have any questions, please contact me at 202-232-4677 or at sgiustino@cancentral.com.

Sincerely,

A handwritten signature in cursive script that reads "Denise A. Bode".

Denise A. Bode
Coalition Coordinator
American Fruit and Vegetable Processors and Growers Coalition