

July 15, 2010

**Written Comments on the
2010 Dietary Guidelines Advisory Committee Report**

United Fresh Produce Association (United Fresh) is pleased to provide comments on the 2010 Dietary Guidelines Advisory Committee Report (DGAC) to the U.S. Department of Agriculture (USDA) and the U.S. Department of Health and Human Services (HHS). United Fresh Produce Association is a Washington, D.C. based national trade organization representing the fresh produce industry including growers, shippers, fresh-cut processors, wholesalers, distributors, supermarkets and restaurants.

Overall, we support the DGAC report and urge USDA and HHS to translate the scientific recommendations into (1) strong, compelling and actionable dietary advice for consumers, including "Half Your Plate Should be Fruits and Vegetables" to more effectively motivate behavior change, and (2) policy and environmental changes that will foster healthier food environments, including increased access to more fresh fruits and vegetables, for all Americans. The 2010 Dietary Guidelines provide a critically opportunity to improve American's eating habits, promote good health and reduce obesity. Now, it's up to USDA and HHS to demonstrate the leadership necessary to implement the comprehensive recommendations made by the DGAC and positive actions to improve our nation's health.

United Fresh commends the DGAC for their thoughtful consideration of the evidence and unprecedented report that recommends:

- (1) Serious efforts to significantly increase fruit and vegetable consumption;
- (2) Policy, regulatory and environmental changes to create healthier food environments, including more fresh fruits and vegetables, where Americans go to school, live, work and play;
- (3) An urgent need to focus on children and primary prevention to prevent childhood obesity; and
- (4) A Call to Action for USDA and HHS to implement systems approaches that create healthier food environments.

We also commend the DGAC for thinking outside the traditional "Dietary Guidelines box." First, by recognizing that policy and environmental changes are necessary to improve American's eating habits and reduce obesity. And second, by dramatically shifting the context and positioning for the 2010 Dietary Guidelines by recognizing that 2/3 of the American public are overweight or obese, 70% are hypertensive or at high risk, very few eat a healthy diet, and all Americans make food choices in a highly obesogenic environment. Historically, the Dietary Guidelines have been written for healthy Americans over the age of 2 years. The fact that so many Americans are not healthy, are obese, do not eat a healthy diet and are at high risk, calls out for USDA and HHS to approach the development of the 2010 Dietary Guidelines in a very different way. We agree, its time for USDA and HHS to develop more effective 2010 Dietary Guidelines and to take real coordinated action that will transform the food environments where Americans live, work, learn and play.

Also, it is important to note that United Fresh shares the DGAC's frustration that "many of its recommendations have been made in prior reports, such as increasing fruit and vegetable intake, yet consumption patterns remain woefully unchanged despite advice to markedly increase intake." We also agree that "because fruits and vegetables are under consumed by the American public, efforts are warranted to seriously promote increased intake of fruits and vegetables." Increasing fruit and vegetable intake will require strong, compelling consumer messages and urgent implementation of policy and environmental changes.

United Fresh offers the following recommendations to USDA and HHS as they develop the 2010 Dietary Guidelines:

1. Provide clear, strong, compelling and actionable messages to consumers to increase fruit and vegetable consumption and other necessary dietary changes.

Although individual behavior change is only part of the solution, the 2010 Dietary Guidelines must be more effective at motivating individuals to eat more fruits and vegetables and improve their eating habits.

Vague consumer messages “food to encourage,” “make wiser food choices,” “emphasize these foods” “choose these foods more often” have been previously used, have not worked in the past and hold out no hope for working this time. Repetition of the same will not work. Clear, specific and compelling consumer messages that acknowledge the disconnect between what Americans are actually eating and what the Dietary Guidelines recommend must be developed, tested and widely communicated.

Also, since the 2010 Dietary Guidelines will form the foundation for federal nutrition education and promotion efforts and federal nutrition assistance programs, the strength, clarity, specific wording and graphic illustration of the dietary recommendations are critical.

For fruits and vegetables, the science is strong and all previous Dietary Guidelines have recommended that Americans need to eat significantly more fruits and vegetables everyday for good health. However, most Americans, including American children, eat less than half of the recommended daily amount of fruits and vegetables and therefore need to double their fruit and vegetable intake. As the DGAC report notes, Americans currently eat less than 60% of the recommended intake of vegetables and less than 50% of the recommended intake of fruits.

This DGAC report cites approximately 200 scientific references related to the health benefits of fruits and vegetables. Fruits and vegetables are nutrient dense, relatively low in calories and associated with improved weight and health outcomes. Vegetable and fruit consumption has long been associated with good health probably due to high vitamin, mineral, fiber and phytochemical content. Evidence suggests an inverse relationship between fruit and vegetable intake and cardiovascular disease and stroke, with significantly larger positive effects noted above 5 servings of fruits and vegetables per day. Also, a worldwide consensus is emerging that consumption of a plant-based, nutrient-dense total diet, with an emphasis on fruits and vegetables, is associated with reduced risk of several major chronic diseases.

The importance of significantly increasing fruit and vegetable consumption is emphasized throughout the DGAC Report. Four main integrated findings to be used in developing the 2010 Dietary Guidelines for Americans are listed in Part B, Section 3. Three of the four major findings (1) reduce calorie intake; (2) shift food patterns to a more plant-based diet; and (3) reduce intake of foods containing added sugars, solid fats, and sodium, all call for increasing consumption of a variety of fruits and vegetables and fiber-rich whole grains.

We agree that the recommended intake amounts for fruits and vegetables in the USDA Food Patterns from 2005 are still appropriate and scientifically accurate recommendations for inclusion in the 2010 Dietary Guidelines.

We agree with the DGAC report that Americans should emphasize vegetables and fruits in their daily food choices without added solid fats, sugars, starches, or sodium to maximize health benefits.

We also agree with the DGAC report's recommendation to create a "red-orange vegetable" subgroup. We believe that colors are an effective way to communicate the importance of eating a variety of colorful fruits and vegetables every day.

Eating more fruits and vegetables is critically important to good health and Americans need to double their fruit and vegetable intake, therefore, we urge USDA and HHS to provide consumers with clear, strong, compelling and actionable messages that motivate consumer to increase their daily intake of a wide variety of nutrient-dense fruits and vegetables.

2 Use "Half Your Plate Should Be Fruits and Vegetables" to illustrate how many fruits and vegetables children and adults need to eat every meal.

The DGAC report notes that..."because fruits and vegetables are under consumed by the American public, efforts are warranted to seriously promote increased intake of fruits and vegetables." And that..."many of its recommendations have been made in prior report, such as increasing fruit and vegetable intake, yet consumption patterns remain woefully unchanged despite advice to markedly increase intake."

Many opportunities for effective communication were not realized following the publication of the 2005 Dietary Guidelines. Now, it's time for USDA and HHS to consider using "Half Your Plate Should Be Fruits and Vegetables" to motivate Americans to increase their fruit and vegetable intake.

The National Cancer Institute (NCI), prior to the publication of the 2005 Dietary Guidelines, developed and tested effective consumer messages to translate the fruit and vegetable recommendations in the 2005 Dietary Guidelines and USDA Food Patterns chart. Recognizing that men and women of different ages, activity levels and caloric intake need a different number of daily servings of fruits and vegetables, the NCI concluded (after much testing) that an overarching behavioral directive "Half Your Plate Should Be Fruits and Vegetables" could effectively communicate and motivate behavior change. The Centers for Disease Control and Prevention (CDC) and the Center for Nutrition Policy and Promotion at USDA have all of the NCI data related to testing the "Half Your Plate Should Be Fruits and Vegetables" message. The data confirms that the "Half Your Plate Should Be Fruits and Vegetables" graphic and message tested very well with diverse ethnic and SES populations.

Therefore, we strongly recommend that USDA and HHS use "Half Your Plate Should Be Fruits and Vegetables" to graphically illustrate and communicate the amount of fruits and vegetables adults and children need to eat at every meal.

3. Commit to implementing policy and environmental changes that will create healthier food environments and systems-wide approaches.

As the DGAC report notes..."the mere repetition of advice will not effectively help Americans achieve these evidence-based and often repeated goals for a healthy diet. And, "the food environment is directly associated with dietary intake, especially less consumption of fruits and vegetables and higher body weight."

The DGAC also issues "A Call to Action" for USDA and HHS to implement coordinated strategic planning and systems-wide approaches to improve the healthfulness of the food environment.

United Fresh agrees that change is needed in the overall food environment to support the efforts of all Americans to meet key dietary guidelines recommendations and that policy and environmental changes are urgently needed. We suggest actions first be taken to improve children's school food environment and low-income family's access to healthy, fresh food.

Policy and environmental actions to increase children's fruit and vegetable consumption should include further expansion of the Fresh Fruit and Vegetable Program, increasing the amount of fresh fruits and vegetables served in school and after-school meal and snack programs and increasing the cash-value of the WIC fruit and vegetable vouchers for children. For low-income families, providing financial incentives to purchase more fruits and vegetables and improving access to grocery stores in underserved areas will create opportunities to improve dietary patterns.

We urge the Secretaries of USDA and HHS to focus first on implementing policy, environmental and systems changes that have already demonstrated effectiveness and need to be expanded (e.g. the Fresh Fruit and Vegetable Program), or have been recommended and prioritized by the Institute of Medicine, the White House Task Force on Childhood Obesity *Solving the Problem of Childhood Obesity in a Generation*. Many action steps and strategies already exist, now its time to implement and execute what has already been recommended to create healthier food environments where Americans go to school, live, work and play.

4. Start with Children and Commit to Action Now

The DGAC report emphasizes the urgent need to focus on children and primary prevention of childhood obesity. The rapid increase in childhood obesity has created a public health crisis because obesity is associated with serious co-morbidities in childhood and a significant increase risk of future chronic diseases in adult life.

Increasing children's consumption of fruits and vegetables is an important public health goal, not only because it will result in increasing intake of "shortfall" nutrients but because diets high in a variety of vegetables and fruits tend to be lower in energy density and likely to improve energy balance and prevent obesity.

Environmental changes, such as expansion of the Fresh Fruit and Vegetable Program and school meals that include more fruits and vegetables, will increase children's access to and consumption of fruits and vegetables. We agree that federal policy makers should start with children and start by implement policy and environmental changes that will help children adopt and maintain healthier eating habits. As mentioned above, we also believe that strategies and action steps already exist, now its time to implement and execute what has already been recommended to create healthier food environments.

In summary,

While the public health challenge is daunting so to is the cost of inaction. The cost of obesity is currently estimated at \$147 billion/year. The DGAC report presents the USDA and HHS with a vision, compelling rationale and roadmap for moving forward.

In closing, United Fresh is committed to working with both USDA and HHS to develop strong and compelling consumer messages to increase fruit and vegetable consumption. We support policy, regulatory, and environmental change as an effective strategy to increase fruit and vegetable consumption and are committed to building support for successful policy implementation. We are committed to focusing first on children and low-income families and recognize the urgency of taking action now. We are also committed to working with our colleagues in the federal government and public health to create systems-wide approaches to creating a healthier food environment.

Thank you for the opportunity to submit comments on the 2010 Dietary Guidelines.

Respectfully Submitted,
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