



March 30, 2018

Dr. Donald Wright  
Deputy Assistant Secretary for Health  
Office of Disease Prevention and Health Promotion  
Office of the Assistant Secretary for Health  
U.S. Department of Health and Human Services  
Washington, DC

Mr. Brandon Lipps  
Administrator, Food and Nutrition Service  
U.S. Department of Agriculture  
Washington, DC

Dear Dr. Wright and Mr. Lipps:

We appreciate the opportunity the United States Department of Agriculture (USDA) and Health and Human Services (HHS) has provided to comment on the proposed topics for the 2020-2025 Dietary Guidelines for Americans (DGA). United Fresh Produce Association is the national trade association representing the distribution chain of fresh fruit and vegetable production including growers, shippers, wholesale-distributors, processors and retailers. Our members are committed to ensuring the American people have access to safe and healthy fresh produce.

The Dietary Guidelines for Americans (DGA) play a critical role in providing the basis for federal food and nutrition policy, including nutrition education initiatives. Understanding their strong role, United Fresh Produce Association has long advocated for aligning all federal programs with the DGA. While awareness around overweight and obesity has improved, two out of three American adults and one out of three children continue to be overweight or obese<sup>i</sup>. Many of these instances, and the accompanying chronic diseases like diabetes and heart disease, can be attributed to poor diet.

As Americans continue to face high rates of overweight and obesity – ensuring the DGA stays strong, evidence-based and translatable to the consumer is important. We support and encourage the increased transparency per the two National Academy of Medicine reports, and also recognize the scientific integrity of the DGA recommendations. We strongly support this commitment moving forward.

As the call for questions indicate, no DGA can function as clinical guidelines for each individual's specific needs, but they can provide recommendations that provide the consumer, institutions and local, state and the federal government with specific framework to support healthy eating. It is important that the DGA continues to focus on clear, specific recommendations. The transition of the DGA from being nutrient-based to what is now eating patterns is consistent with the needs of Americans and the reality

of diets today. Without quantitative serving sizes – consumer understanding is diminished and the DGA loses its ability to effectively impact the many federal, state and local nutrition programs that rely on its recommendations.

The questions posed through the request for comments did not indicate if these will exclusively be the topics and areas addressed in the 2020-2025 DGA or if a full review will take place. While we recognize that USDA and HHS are requesting feedback on the specific questions posed – we note the continued importance of providing fruit and vegetable recommendations through the DGA and for allowing the Dietary Guidelines Advisory Committee (DGAC) to explore broader set of topics around evidence for healthy eating. The life stages approach is a promising one, allowing there to be greater focus on specific needs of those age groups, but it must address the full diet in order to do so, including fruit and vegetable consumption.

For fruits and vegetables specifically, the 2015 DGA recommends that a healthy eating pattern consists of 2.5 cup equivalent of vegetables and a 2 cup equivalent of fruit (for a 2,000 calorie diet). Specifically, the 2015 DGAs recommend Americans include a variety of vegetables from all of the subgroups—dark green, red and orange, legumes (beans and peas), starchy and increase consumption of fruits, especially whole fruits.

These recommendations continue to be both relevant and important because, according to the Centers for Disease Control (CDC), only about one in 10 Americans meet these daily recommendations<sup>ii</sup>. The evidence for the importance of fruit and vegetable consumption has not weakened. In fact, there is additional data that intake of vegetables and fruit protect health<sup>iii</sup>. Accordingly, the DGAC should continue the current recommendations from the 2015 DGA or provide quantitative recommendation for fruit and vegetable intake. Ensuring all recommendations are maintained in one place makes for a better education resource, even if the same advice can be found in other areas of federal guidance. The DGA should maintain its role as the primary source and hub of dietary recommendations given its commitment to scientific integrity.

As an example of the impact of the DGA's recommendations around fruit and vegetables on federal nutrition policies, consider programs like the National School Breakfast and Lunch programs and the Child and Adult Care Feeding Program (CACFP). Each have made updates to more accurately reflect DGA recommendations. While updated CACFP guidelines are in their infancy in terms of implementation, the updates to the National School Lunch Program are several years in and show promising results. Fruit selection increased by 23 percent, and consumption of vegetables increased by 16.2 percent by students participating in the program.<sup>iv</sup> The DGA provided framework for these changes, while also allowing USDA to consider other factors that impact these programs and their implementation.

Quantitative recommendations to healthy eating patterns continue to be critically important, but so is the complementary messaging of MyPlate. The MyPlate platform is consumer friendly and flexible across meals, age groups, cultures and federal programs. As the least consumed recommendation of all DGA – fruit and vegetable consumption must continue to be addressed and supported by the DGA, including the MyPlate messaging.

We reiterate our support for the agencies' commitment to ensuring Americans and the programs that serve them have access to transparent, robust, and evidence-based nutrition guidance through all life stages. Our members remain dedicated to ensuring Americans have access to fresh fruits and vegetables

consistent with the DGA. We stand ready to provide the agencies and the DGAC with any necessary information as the process continues and look forward to the final 2020-2025 Dietary Guidelines for Americans.

Sincerely,



Mollie Van Lieu  
Senior Director, Nutrition Policy  
United Fresh Produce Association

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<sup>i</sup> Fryar CD, Carroll MD, Ogden CL. Prevalence of overweight, obesity, and extreme obesity among adults aged 20 and over. *National Center for Health Statistics*. 2016 July. Available at [https://www.cdc.gov/nchs/data/hestat/obesity\\_adult\\_13\\_14/obesity\\_adult\\_13\\_14.htm](https://www.cdc.gov/nchs/data/hestat/obesity_adult_13_14/obesity_adult_13_14.htm).

<sup>ii</sup> Centers for Disease Control and Prevention. Morbidity and Mortality Weekly Report (MMWR). 2017 November. Available at [https://www.cdc.gov/mmwr/volumes/66/wr/mm6645a1.htm?s\\_cid=mm6645a1\\_w](https://www.cdc.gov/mmwr/volumes/66/wr/mm6645a1.htm?s_cid=mm6645a1_w).

<sup>iii</sup> Aune D, Giovannucci E, Boffetta P, et al. Fruit and vegetable intake and the risk of cardiovascular disease, total cancer and all-cause mortality – a systemic review and dose-response meta-analysis of prospective studies. *Int J Epidemiol*. 2017 Jun 1;46(3):1029-1056. Doi. 10.1093/ije/dyw319.

<sup>iv</sup> Cohen J, Richardson S, Parker E, Catalano P, Rimm E. Impact of the New U.S. Department of Agriculture School Meal Standards on Food Selection, Consumption, and Waste. *American Journal of Preventive Medicine*. 2014 March 46(4):388-394.