



August 13, 2020

Submitted electronically via www.regulations.gov

Kristin Koegel
USDA Food and Nutrition Service
Center for Nutrition Policy and Promotion
1320 Braddock Place, Room 4094
Alexandria, VA 22314

Re: Written Comments to USDA and HHS on the 2020-2025 Dietary Guidelines Advisory Committee Scientific Report; Docket FNS-2020-0015

FMI appreciates the opportunity to provide comments to the United States Department of Agriculture (USDA) and Health and Human Services (HHS) on the 2020-2025 Dietary Guidelines Advisory Committee Scientific Report. We appreciate the collective work of the Advisory Committee, USDA and HHS on the forthcoming 2020-2025 Dietary Guidelines for Americans (referred to in this document as *Dietary Guidelines*).

About FMI

As the food industry association, FMI works with and on behalf of the entire industry to advance a safer, healthier and more efficient consumer food supply chain. FMI brings together a wide range of members across the value chain – from retailers that sell to consumers, to producers that supply food and other products, as well as the wide variety of companies providing critical service – to amplify the collective work of the industry. The reach and impact of our work is extensive, ultimately touching the lives of over 100 million households in the United States and representing an \$800 billion industry with nearly 6 million employees. www.FMI.org

Overview

FMI recognizes the key role of the *Dietary Guidelines* in federal nutrition policy, nutrition standards, and educational programs. FMI supports both the focus on a life stages approach as well as the continued focus on overall healthy dietary patterns. Recommendations should be well-suited for the adoption of small behavior changes to





improve the connection between food and beverages to better health for all Americans, from infancy and childhood through adolescence and adulthood. Effective and achievable guidance aimed at improving the overall health of the nation must be both **science-based** and **practical** for consumers to apply to their personal lifestyle to achieve optimal health and well-being.

Recommendations Must be Science-Based

As the Dietary Guidelines Advisory Committee Scientific Report reminds us, the National Nutrition Monitoring and Related Research Act of 1990 mandates that the Secretaries of USDA and HHS review and release the *Dietary Guidelines* at least every five years so that they reflect “the preponderance of scientific and medical knowledge that is current at the time the report is prepared.” FMI and our member companies value scientific data and information, recognizing that the science of nutrition continues to advance and evolve over time. We believe that it is extremely important to maintain this strict scientific standard to ensure that consumers are provided with accurate information.

Along with some of our industry members, we are concerned that certain aspirational recommendations from the advisory committee are not based on the entire body of scientific literature available at present. We ask that you consider the strength of the entire body of available scientific literature to build the new *Dietary Guidelines* on findings most consistent with science in the best interest of public health.

Recommendations Must be Practical to Encourage Adherence

The best consumer dietary guidance comes in the form of realistic, practical, easy-to-understand messages that link food to health. It is necessary to consider real life circumstances to ensure that the *Dietary Guidelines* are practical to apply for all Americans, and that they make good sense for public health. When reviewed by individuals, the *Dietary Guidelines* should compel Americans to make small changes and set achievable goals to improve their health with both the gradual addition of beneficial foods and nutrients, and the gradual reduction of components linked to poor health outcomes and diet-related disease. Each recommendation should be easy to justify with solid scientific evidence to support specific connection to improved health. If limitations are set unjustifiably rigid, or too complicated to interpret they will be disregarded by the





general public, rather than helpful in encouraging better adherence through the life stages.

Adherence to the recommended patterns is as important as the patterns themselves. Raising awareness of food groups to encourage, nutritional quality of food choices, and beneficial nutrients to include must be highlighted and balanced with recommendations on nutrients to limit in order to ultimately encourage consumers to create and maintain healthy eating patterns.

Food Industry Partners Support the Dietary Guidelines

The supermarket industry has long been committed to helping consumers achieve and maintain a healthful, balanced diet. Food retailers have created a marketplace for healthy, accessible, nourishing food choices, along with information about health and well-being. Product suppliers and manufacturers work to ensure nutrient-rich choices are widely available to meet varied consumer needs. Together retailers, suppliers and manufacturers continually strive to facilitate healthy choices and eating behaviors among shoppers.

Food industry partners have the ability to provide every day food and beverage solutions, right in the grocery store aisles, to help consumers more closely adhere to the *Dietary Guidelines*, if they are clearly stated, easy to follow, based in science and practical to apply. When the *Dietary Guidelines* are easy to interpret and realistic to follow, retailers, suppliers and manufacturers are well enabled to support consumers by providing simple messaging and innovative solutions to boost adherence and alignment when shopping, cooking, and eating. FMI supports the work of our industry members and collaborators as key partners for health and well-being in the communities they serve.

Most retailers in the supermarket industry now employ registered dietitians at the corporate or store level, who assist in identifying and creating healthful messaging and personalized choices for consumers looking to improve health and stay well. In turn, retailers provide meal ideas and tips, accurate nutrition labeling, guidance, and support for convenient, healthy, enjoyable food solutions. Many suppliers and manufacturers also employ registered dietitians for their knowledge of and experience with science, labeling regulations, nutrients, ingredients, allergens, supplements, health messaging and overall strategic innovation related to diet and health in the food industry. This





internal focus on health and well-being quite often positions the food industry in the unique situation to help consumers with science-based, practical ways to encourage healthy dietary patterns and eating behaviors. Consumers will continue to look for support and guidance with improved health and overall well-being, and the grocery industry is well poised to reinforce the recommendation of the *Dietary Guidelines*, and consistently provide ample choice of items recognized as nutritious.

Feeding Assistance and the Dietary Guidelines

With an increase in feeding assistance needs across the country due to the COVID-19 pandemic economic stress, estimated to include 6 million new federal program participants, the *Dietary Guidelines* will play a critical role in public health. The grocery industry, through direct interaction in stores and with employees, plays the critical front-line role in the shopping experience of Supplemental Nutrition Assistance Program (SNAP) and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) customers. For the customers who rely on SNAP at points in their lives, it is a lifesaver. Emphasis and education on the nourishing foods and beverages included in feeding assistance programs is key to improved health and overall well-being.

It is important to help all Americans understand that foods and beverages available in feeding assistance programs can align with recommendations from the *Dietary Guidelines* and options in all forms (fresh, frozen, canned, dried) can fit into overall healthy eating patterns. This understanding could potentially open the door to widespread acceptance and inclusion of many of the basic, nutritious, affordable items accessible to SNAP and WIC households. The food industry consistently provides nourishing food and beverages choices in all categories to support healthful eating patterns for all consumers, including SNAP and WIC shoppers.

School Meals and the Dietary Guidelines

School meals are healthy meals that are required to meet the *Dietary Guidelines*. To receive federal reimbursements, school meal programs must offer “reimbursable” meals that meet strict federal nutrition standards. These standards, also referred to as “the meal pattern,” require schools to offer students the right balance of fruits, vegetables, low-fat or fat-free milk, whole grains, and lean protein.





With the potential for more school-aged children to eat meals at home during the COVID-19 pandemic, there is increased need and opportunity to educate on the importance of the *Dietary Guidelines*. Food industry partners have the ability to provide at-home equivalent grocery components to help consumers build and customize meals with the same high-quality nutrition considerations of those in the school environment. This is particularly important for households with limited resources to purchase food and other necessities for their school-aged children.

Pandemic Electronic Benefit Transfer (P-EBT) implementation provides funding to millions of school-aged children in both SNAP and non-SNAP households. P-EBT only runs for the regularly scheduled school year when school is closed for five consecutive days during a public health emergency, providing families funds to cover breakfast, lunch and snack costs. To date 49 states have been approved to distribute over \$9 billion in P-EBT funds for use towards food and beverages at local grocery stores to help keep American children nourished.

Family Meals and Overall Healthy Eating Patterns

As per USDA, we know that now more than ever, consumers are cooking at home, relying heavily on foods purchased in the supermarket and online from retailers. Opportunity is ever-present to help individuals and families recognize the importance of the foods, beverages, and nutrients encouraged by the *Dietary Guidelines* and to help consumers build meals at home that provide nutritional advantages as part of a balanced diet.

To help bridge the gap on identified nutrients of public health concern, a strong focus on health as it relates to the regular inclusion of beneficial foods and beverages while grocery shopping, home cooking, and eating ultimately sets the stage for healthy habits that align with the *Dietary Guidelines*. As households plan and build family meals, there is opportunity to reaffirm the importance of beneficial food groups and beverages in overall healthy patterns of eating.

Our research, as well as other existing research, indicates that those who eat and cook more family meals at home include more fruits and vegetables and consume fewer calories, fat, and sugar. Furthermore, current and emerging research indicates children and adolescents who share family meals at home are more likely to be in a normal weight range and benefit from healthier dietary patterns and eating habits, as well as stronger family connections and emotional well-being.





Food retailers are uniquely positioned to make family meals at home easier to accomplish. The FMI Foundation has created a nation-wide movement around family meals designed to make eating and cooking at home easier, more approachable, and more economical. It is the mission of FMI and its Foundation to highlight the role of grocers and to bring our industry together around a family meal movement encouraging Americans across the country to “stay strong with family meals.” The COVID-19 pandemic has made this focus even more important. To recognize the work FMI member companies and community collaborators are currently engaged in to promote family meals through the FMI Foundation, and for more information on the National Family Meals Movement visit www.fmi.org/family-meals/.

Our members and valued partners are committed to providing easy, affordable, and nutritious choices and meal solutions to help families stay strong for breakfast, lunch, snacks *and* dinner where they live, learn, work, play and gather.

Importance of Food Safety

Recognizing that more consumers are preparing, cooking, and storing food at home, it is essential to emphasize the importance of proper hygiene and food safety in the home environment. Safe food is fundamental to a healthy diet for all Americans. Retailers, suppliers, and manufacturers prioritize food safety and the industry is committed to keeping food safe along the entire supply chain. Our Food Protection Committee and CEO level Food Safety Committee are continuously looking for improvements and additional ways to ensure a food safety culture exists in the retail environment. FMI is a founding member of the Partnership for Food Safety Education (PFSE) and the public private partnerships works to educate consumers on the importance of food safety. FDA, USDA and CDC are involved with the work of PFSE and we encourage food safety messaging to be a part of all education programs regarding healthy eating.

Food safety was first introduced in the 2000 Dietary Guidelines for Americans, and FMI supports the continuation of recommendations related to food safety behaviors and strongly supports additional education on the four basic messages of clean, separate, cook and chill to help consumers reduce the risk of foodborne illness. Simple steps and clear resources should be included in the *Dietary Guidelines* to keep Americans healthy and well and reduce the risk of foodborne illness in their own kitchens, especially as we know that more consumers are preparing and cooking more meals at home.





Grocery Industry Well-Poised to Support Dietary Guidelines

In local communities across the country, the food industry plays a vital role in advancing a safer, healthier, more efficient consumer food supply chain, ensuring that local grocers are able to meet the needs of consumers both in the supermarket and online. As more Americans look to stay healthy and well, variety and choice provided by retailers, along with education and encouragement by dietitians and health professionals can lead to gradual adoption of healthy eating habits more closely aligned with the *Dietary Guidelines* to improve public health, particularly if recommendations are clearly grounded in science and practical for consumers to apply.

We appreciate the opportunity to comment on the Advisory Committee Scientific Report and future implications for the 2020-2025 *Dietary Guidelines*. Please feel free to contact me should you have questions about our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Krystal Register', is positioned below the 'Sincerely,' text.

Krystal Register, MS, RDN, LDN
Director, Health and Well-Being

