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May 4, 2015

The Honorable Sylvia Mathews Burwell
Secretary of Health and Human Services
200 Independence Avenue, SW
Washington DC, 20201

The Honorable Thomas J. Vilsack
Secretary of Agriculture
1400 Independence Avenue, SW
Washington DC, 20250

Re: The Dietary Guidelines for Americans, 2015

Dear Secretary Burwell and Secretary Vilsack:

California Food Policy Advocates (CFPA) thanks you for the opportunity to comment on the expert report prepared for the eighth edition of the *Dietary Guidelines for Americans* (DGA) by the Dietary Guidelines Advisory Committee (DGAC). Overall, we strongly support the conclusions and policy recommendations in the report.

CFPA is a statewide policy and advocacy organization whose mission is to improve the health and well-being of low-income Californians by increasing their access to nutritious, affordable food. CFPA has worked to strengthen the federal nutrition programs for over 20 years by sponsoring state legislation, conducting research, and working with communities across California to create environments that support optimal nutrition. We recognize the central role the DGA report plays in shaping nutrition policy; an update that grounds the dietary guidelines in science is important for public health and critical to CFPA's work to improve access to and quality of foods available through the federal nutrition programs. CFPA envisions a healthy and food-secure California where two conditions are met: (1) all Californians have physical, social, and economic access to the foods necessary for a nutritious diet; and (2) healthful foods are predominant affordable options in all environments. As an organization, we have decades of experience in bridging the anti-hunger, nutrition and health movements. We respectfully submit the following comments.

- We strongly support the DGAC's focus on the broad range of factors, including policy and environmental approaches, which influence people's diet and weight-related behaviors. The final DGA report should continue to reflect these sensible and science-based changes to our food environment and public policies to facilitate and support Americans making healthier food and beverage choices across the lifespan.

Reversing current obesity trends and changing dietary patterns on a broad scale requires a comprehensive, coordinated system-wide approach that engages all levels of the socio-ecological model. In particular, policy, environmental and systems changes must make healthy foods and beverages more accessible, affordable and desirable, while making less healthy foods less accessible, affordable and desirable. As with many other organizations, CFPA endorses this approach to improving diet, promoting health and reducing

diet-related chronic diseases through changing policies and the environments where youth and adults spend the majority of their time^{i, ii, iii, iv}

We commend the DGAC for focusing on food environments—specifically child care and school settings—and their relationship to weight-related outcomes, dietary intake and quality. We applaud the DGAC’s acknowledgment of the importance of federal nutrition programs to provide access to affordable foods that help millions of Americans meet the DGA recommendations. The final DGA report should emphasize the important roles that these food environments and public policies play in the ability of Americans to follow the DGA’s recommendations.

- CFPA commends the DGAC’s attention to a variety of healthy dietary patterns and emphasis that healthy diets should meet nutrient needs with whole foods. We strongly support the DGAC’s recommendations to reduce consumption of added sugars and sodium, and to increase consumption of fruits, vegetables, whole grains and healthy beverages.

We support the DGAC’s conclusions on the need for policies that address over-consumption of added sugars. On any given day, half the people in the U.S. consume sugary drinks.^v Addressing sugar-sweetened beverage (SSB) consumption can significantly impact the amount of added sugars individuals consume.^{vi} We agree that the DGA should endorse policies that would discourage excessive consumption of added sugars, and reduce SSB consumption, including the following:

- Revising the Nutrition Facts label to have a line for added sugars, with amounts expressed in both grams and teaspoons, along with a percent daily value. Such food labels would maximize consumer understanding, including helping school food service providers to easily quantify added sugars and make appropriate menu changes to reduce student intake of added sugars.
 - Testing economic and pricing approaches, including incentives and disincentives.
 - Continuing efforts to reduce added sugars in foods and beverages in school, child care and afterschool settings through federal child nutrition programs.
- CFPA supports the development of policies, as the DGAC recommends, to promote water as the primary beverage of choice. We also support public education and policy changes to encourage access to clean water, including a symbol for water as part of the graphics for MyPlate.

Water is essential for life and is a healthy alternative to SSBs. Recent research shows that substituting drinking water for SSBs can help reduce intake of calories from added sugars among both children and adults.^{vii} Improved water access also helps students stay hydrated, which supports mental concentration, and in turn keeps them focused and ready to learn. For these reasons and more, CFPA sponsored legislation in California that addresses issues of water access and consumption.¹ We encourage the U.S. Departments of Health and Human Services (HHS) and Agriculture (USDA) to implement similar policies and initiatives that improve water access in and outside of schools, especially in places where children learn, live and play.

Including a symbol for water on MyPlate has the potential to have a large impact given the reach of MyPlate. During an initiative to promote MyPlate and 2010 DGA consumer messages, over 2.6 billion media impressions were recorded via more than 1,500 media outlets during a five month period.^{viii}

¹ California’s Healthy Beverages in Child Care Law, Cal. Assemb. Bill 2084 (2009-2010), Chapter 593, (Cal. Stat. 2012) and California’s Schools: Pupil Nutrition: Availability of Tap Water Law, Cal. Senate Bill 1413 (2009-2010), Chapter 558, (Cal. Stat. 2011)

- CFPA supports the DGAC's suggestion that, "policy changes within the federal Supplemental Nutrition Assistance Program (SNAP)...should be considered to encourage purchase of healthier options, including foods and beverages low in added sugars." The final DGA report should include this recommended approach while emphasizing the necessity of testing potential policy changes through rigorously evaluated demonstration/pilot projects before wide-ranging changes are made.

To this end, we support the DGAC's suggestion to pursue, test and evaluate pilot studies that use incentives and restrictions. We recommend that the final DGA report specify that such pilot studies should (a) preserve client autonomy; (b) exist among community-wide efforts to promote health and nutrition; and (c) assess the effects of purchasing restrictions combined with purchasing incentives within SNAP. In addition, proposed changes to SNAP should incorporate input from SNAP participants and eligible households.

- CFPA commends the DGAC's inclusion of recommendations and practices regarding food sustainability and safety and the recognition of their interrelation with food security.

It is of utmost importance that practices and policies facilitate and support the availability of and access to healthy foods in both the short- and long-term. We are pleased with the inclusion of this new area for the DGAC and recommend that a focus on food sustainability, in particular as it pertains to food security, be included in the final DGA report.

The basic nutrition advice in the Guidelines has been largely unchanged for years; what has not yet altered is America's under-consumption of fruits, vegetables, and whole grains and over-consumption and over-promotion of unhealthful foods. The 2015 DGA can, and should, position Americans on a path to better health. We strongly urge those tasked with finalizing the DGA to maintain the emphasis in the DGAC's report on systematic policies, systems and environmental changes that will improve the nutritional quality of foods and beverages that are widely available, affordable, marketed and consumed.

We would be pleased to provide more information regarding these and other issues. For questions, please contact Anna Fischer at anna@cfpa.net or 213.482.8200 ext. 204.

Sincerely,



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Hector Gutierrez, MURP
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