

The Produce for Better Health Foundation praises this Administration, as well as the staff of USDA and HHS, for your focus on transparency, science, data, and collaboration in embarking on the 2020 *Dietary Guidelines for Americans*. We commend you for your long-term commitment to the continuous improvement of the process and implementation of the *Dietary Guidelines* policy. My name is Wendy Reinhardt Kapsak, President and CEO of the Produce for Better Health Foundation, and I am honored and grateful to provide comments on behalf of the “all forms” fruit and vegetable industry.

Our remarks will focus on: 1) recommendations resulting from the second Consensus Study Report of the National Academy of Medicine entitled, “*Redefining the Process for Establishing the Dietary Guidelines for Americans*,” and 2) additional considerations as they relate to the Produce for Better Health Foundation’s expertise of increasing fruit and vegetable intake among Americans.

Recommendation to expand the *Guidelines*’ scope and improve continuity between editions

We will start with the Consensus Study Report recommendations.¹ Given the incidence of overweight, obesity, and chronic disease in our country, as well as the growing appreciation for the importance of establishing healthy eating patterns from conception to adulthood, PBH agrees that it will be important to broaden the *Guidelines*’ scope to include all Americans, throughout the lifespan, rather than limiting recommendations to healthy Americans ages 2 years and older. Additionally, nutrition science continues to evolve, extending beyond what we currently know about nutrients, food groups, dietary patterns, as well as other areas such as bioactive compounds, nutrigenomics, and the gut microbiome. Therefore, another important recommendation is to create a “Dietary Guidelines Planning and Continuity Group to monitor and curate new evidence, identify and prioritize topics for inclusion in the DGA, and provide strategic planning support across DGA cycles.”¹ PBH believes this will serve as a critical opportunity to carry forward validated knowledge in dietary guidance (e.g., the importance of consuming fruit and vegetables in all forms based on their role in overall healthy eating patterns and relationship to preventing cancer and cardiovascular disease), while seizing the chance to explore other evolving areas more in-depth (e.g., bioactive compounds, fruit and vegetable intake and gut health, emotional well-being, reduction of inflammation, etc.) and will ultimately result in more intensive, well-rounded, and personalized dietary guidance for Americans.

Fruit and vegetables: Clearly important, but under-consumed

The importance of fruit and vegetable intake to both short- and long-term public health is one of the most accepted and least controversial dietary advice around. Recommendations to consume a well-balanced diet that includes plenty of fruit and vegetables has been a centerpiece of *Guidelines* since their inception in 1980, culminating in the most recent *Dietary Guidelines 2015-2020* which state that the evidence is strong regarding the relationship between positive health outcomes and healthy eating patterns, of which higher intakes of fruit and vegetables have consistently been identified as a critical component. What has also remained consistent, unfortunately, is that the majority of Americans do not eat according to *Dietary Guidelines* recommendations.² Fruit and vegetable intake, in particular, has habitually fallen below recommended levels, despite consistent science and communication of this recommendation. In fact, a study in CDC’s Morbidity and Mortality Weekly Report (MMWR), released on November 16, 2017, reports that just 1 in 10 adults meet the federal fruit or vegetable recommendations.³

What can we do differently, for the benefit of public health, to increase the adherence to Dietary Guidelines recommendations, and more specifically, increase fruit and vegetable intake?

As you may know, since its creation in 1991, PBH has been dedicated to partnering with value chain stakeholders, consumer influencers, and thought leaders to facilitate and advocate for increased fruit and

vegetable consumption. We have worked diligently to support, communicate, and implement each of the *Guideline* editions through the above-mentioned partnerships, as well as robust national campaigns such as 5 A Day For Better Health and, more recently, the Fruits & Veggies—More Matters® platform. What you may not know, however, is that all of PBH’s activities are based on a decades long commitment to gathering, analyzing, and integrating insights related to science, consumers, and marketplace consumption to better understand and help Americans close the gap between intake and the recommended USDA food patterns. PBH is the only national organization focused entirely on the intake of fruits and vegetables in a variety of forms (e.g., fresh, frozen, canned, dried, and 100% juice).

While PBH’s fruit and vegetable insight data is far-reaching, we want to share insights related to the following three areas: 1) Trends in knowledge, attitudes, and beliefs toward fruit and vegetables, 2) Fruit and vegetables in all forms, and 3) Best practices for increasing consumption of fruit and vegetables.

First, over time there has been an evolution in how consumers view “health” as a relative and multi-faceted state that is comprised of typical wellness elements, lifestyle factors, and psychosocial components. Trends consistently indicate that intake of fruit and vegetables is among the top factors that consumers feel contribute to their health and they say they eat them to stay healthy. However, over time PBH has observed 1) decreases in expressed “belief” in the healthfulness of fruits and vegetables in disease prevention, as well as the healthfulness of the nutrients and components they contain; 2) increased perception that serving fruits and vegetables is not “easy”; and 3) declining intake, particularly among older Americans, historically the highest consumers.^{4,5} The bottom line is that current food decisions seem to be more aligned with an individual’s lifestyle, values, and emotionally-based beliefs than with scientific knowledge, nutrient content, or proven health benefits. Therefore, it will not be enough to tell consumers to eat more fruit and vegetables because they are healthful, but rather it will be critical to tap into a deeper motivation, and alleviate barriers, for doing so. PBH’s most recent research, conducted in 2017, may provide one opportunity to do just that, since it adds to an emerging body of research showing that elevated fruit and vegetable intakes may be predictive of improved happiness, life satisfaction, and well-being.⁶

Secondly, while the following data have been a fixture in government reports, it may come as a surprise to some because, quite frankly, interpretation, translation, and communication of the DGA often focus on consuming fresh at the expense of all forms. As a result, misconceptions and biases regarding forms other than fresh persist. Fruit and vegetables, in multiple forms, provide several nutrients of public health concern including fiber, folate, iron, and potassium.² Forms of fruit and vegetables, other than fresh, are often thought to contribute excess sodium and added sugars to the American diet. However, the most recent data, included in the last Guidelines, tell a different story. Vegetables only contribute about 7% of sodium (and this is inclusive of French fries). Fruit, fruit juice, and vegetable intake combined contribute ~2% added sugar.² Additionally, 100% juice has been linked to overall better quality diets and have not been linked to overweight/obesity in healthy adults and children.^{7, 8, 9} If that’s not compelling enough, PBH trended consumer research consistently demonstrates that increased household availability and use of all forms of fruit and vegetables is correlated with higher intakes of produce overall.^{4, 6} We contend that there is a critical need to increase understanding regarding the role that all forms (fresh, frozen, canned, dried and 100% juice) play in helping Americans alleviate consumption barriers, and subsequently, achieve consumption recommendations and nutrient adequacy.

Finally, rather than reinventing the wheel, let’s harness what we know about fruit and vegetable consumption and best practices in supporting the public in increasing intake. We know that eating a variety of fruit and vegetables has been associated with increased intake.¹⁰ We know that 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.¹¹ We know that clustering of healthy behaviors promotes positive behavior change.¹⁰ We also know that a multifaceted approach is needed to achieve substantial and clinically relevant improvements in fruit and vegetable intake.¹⁰

So, in the interest of thinking differently about helping Americans increase their fruit and vegetable intake, PBH implores the group to work together on multi-factorial interventions and approaches; use inclusive language when encouraging increased fruit and vegetable consumption; promote variety in fruit and vegetable choices and forms; and delve more deeply into other health and emotional well-being benefits that can compel Americans to higher intakes of fruit and vegetables, and healthy eating patterns overall. Let's all help Americans "Make half their plate fruits and vegetables," by helping them remove barriers. Talking to consumers, clearly, definitively, and concisely, and giving them permission to consume all forms could do just that.

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