



October 20, 2011

Kathleen Sebelius, Secretary
U.S. Department of Health
and Human Services
200 Independence Avenue, SW
Washington, D.C. 20201

Martha N. Johnson, Administrator
U.S. General Services Administration
One Constitution Square
1275 First Street, NE
Washington, D.C. 20417

Dear Secretary Sebelius and Administrator Johnson:

We, the undersigned organizations of the National Alliance for Nutrition and Activity (NANA), write to you about the Health and Sustainability Guidelines for Federal Concessions and Vending Operations. The Guidelines are an important development in public health policy, and will do much to support the health of the federal workforce. They also are likely to affect the health of state, local, and private-company workers, as federal guidelines are often used by state and local governments and private companies.

As you know, good nutrition is central to the nation's health, with poor nutrition a major contributor to heart disease, cancer, diabetes, and other costly and debilitating diseases. We commend the agencies for considering health and nutrition as a part of contracts for federal facilities and for providing a model for other employers.

There are many strong components to the Guidelines. We are pleased they include calorie labeling on menus and menu boards. Providing employees with nutrition information at the point of choice will allow them to make informed decisions and provide an incentive for food-service operators to improve the nutritional quality of their offerings. The Guidelines are strong on trans fat and provide a good starting point for reducing sodium intake. We also applaud the departments for the strong emphasis on local, sustainable purchasing when possible.

We are pleased that the Guidelines are meant to be a living document and that you will update them as nutrition science and consumer demand evolve. In this letter we offer several suggestions to bring the concession and vending criteria more in

line with the *Dietary Guidelines for Americans*, changes that we hope you will incorporate this year.

The criteria would be considerably stronger if throughout they included standards for saturated fat and calories. Given that excessive calories are one of the biggest nutritional challenges that Americans face, it would be helpful to ensure that menus include a significant number of moderate-calorie options. Americans also over-consume saturated fat, which raises blood cholesterol levels and the risk of heart disease. In addition, we make the following suggestions to strengthen and clarify the Guidelines:

- **Pricing strategies:** Under the General Guidelines, we encourage you to add a section for pricing strategies. For concessions, half portions should be encouraged and priced to facilitate their selection. For both concessions and vending, pricing strategies should be used to make higher-calorie options more expensive and fruits, vegetables, and other healthy selections less expensive.
- **Fruits and vegetables:** The criteria are too strict regarding fruits and vegetables. Given that Americans consume far too few fruits and vegetables, we strongly support the criteria for increasing the variety of choices available. However, in addition to the allowance of fresh, frozen, and water- or juice-packed canned fruits and vegetables, it should be permissible to allow fruits packed in light syrup, which can provide inexpensive and appealing options. We see no need to specify that raw vegetables be available, as cooked vegetables are equally nutritious. In addition, there is no nutritional reason to insist that plain, fat-free vegetables be offered. We instead suggest that the majority of vegetable options be low in saturated fat and moderate in sodium.
 - We recommend that bullets i and ii of the vegetable criteria be deleted and replaced with the following:
 - Offer daily, at least 2 non-fried vegetable options, which are low in saturated fat (≤ 1 gram) and contain ≤ 230 mg of sodium.
 - The “above standard” criteria for vegetables should include an additional bullet that reads as follows: Serving sizes of fried vegetable and fruits should be limited to no more than 300 calories and be priced at 50% above the cost of the most expensive vegetable on the menu.
- **Cereals and grains:** The cereal and grains criteria should include a clear definition of whole grains; grain products should have a whole grain listed as the first ingredient and 2 grams or more of fiber per serving. The grain guidelines also should address sweet baked goods. Sweet baked goods are a major source of calories, added sugars, and saturated fat in Americans’ diets. We recommend adding a criterion that half of the pastries, desserts, and other sweet baked goods offered be under 250 calories (half portions should be encouraged and pricing strategies should be used to make higher-calorie options proportionally more expensive).

- **Dairy:**
 - We urge you to remove 2% milk and yogurt from the listed dairy options. The *Dietary Guidelines* recommend that dairy be consumed as low or no fat options. Low-fat yogurts are the market leaders, and there is little taste difference between 1% and 2% milk.
 - The criterion for sugars in yogurt is unclear and will be hard to implement. Instead the Guidelines should limit the sugars to no more than 30 grams of total sugars per 8-ounce container (and adjust proportionally for smaller containers; based on IOM recommendation for foods sold in schools outside of the meal programs, see <http://www.iom.edu/Reports/2007/Nutrition-Standards-for-Foods-in-Schools-Leading-the-Way-toward-Healthier-Youth.aspx>).
 - The sodium criterion for “processed” cheeses also should apply to “natural” cheeses (in fact, all cheeses are processed foods).
 - Given that cheese is a top source of saturated fat in Americans’ diets, the Guidelines should urge that reduced-fat cheeses be used to the greatest extent possible.

- **Beverages:**
 - We urge you to change the 40-calorie beverage criterion from “per serving” to “per container.” The whole container of a beverage should be low calorie in order to qualify. A 100-calorie container of a sugary beverage, while *lower* in calories than a full-calorie soda, is not *low* in calories.
 - Allow diluted or sparkling juices by replacing bullet 6.a.ii. with: "If juice is offered, only offer juice with no added caloric sweeteners."
 - Apply the 12-ounce portion size limit for caloric beverages from being an “above standard” criteria to a “standard” criteria and apply it to all beverages with more than 40 calories, including juices.

- **Vending:**
 - **Food:** It does not make sense that all vended options have to meet trans and sodium standards, but standards for calories, saturated fat, and sugars apply to only a small percentage of options. All the standards should apply to 50% of the vended items to start (to match the criteria for beverages), with an “above standard” guideline of 75% of the items meeting all the criteria.
 - **Beverages:**
 - Change the 40-calorie beverage criteria from “per serving” to “per container.”
 - Do not include 2% milk.
 - Allow diluted or sparkling juices by replacing vending bullet 6.c. with: "If juice is offered, only offer juice with no added caloric sweeteners."
 - Expand the 12-ounce portion size limit for caloric beverages from an “above standard” criteria to a “standard” criteria and apply it to all beverages with more than 40 calories, including juices.

Again, we congratulate the agencies for developing and implementing guidelines for federal concessions and vending. We urge you to build on your initial Guidelines to better address key nutritional concerns, such as calories and saturated fat, and bring the Guidelines into better alignment with the *Dietary Guidelines for Americans*, while still keeping them realistic and achievable.

Sincerely,

Advocates for Better Children's Diet

American Association for Health Education

American College of Preventive Medicine

American Dietetic Association

American Institute for Cancer Research

Apple Processors Association

Association of State & Territorial Public Health Nutrition Directors

Be Active New York State

California Center for Public Health Advocacy

Center for Communications, Health & the Environment

Center for Science in the Public Interest

Defeat Diabetes Foundation

Directors of Health Promotion and Education

Earth Day Network

FGE Food & Nutrition Team

IDEA Health & Fitness Association

Leadership for Healthy Communities

Maternity Care Coalition

National Association of Chronic Disease Directors

National Association of County and City Health Officials

National Consumers League

National Network of Public Health Institutes

National WIC Association

Nemours

Oregon Public Health Institute

Partnership for Prevention

Prevention Institute

Public Health Law & Policy

Robert Wood Johnson Foundation Center to Prevent Childhood Obesity

Shape Up America!

Society for Nutrition Education and Behavior