



UNITED STATES
Potato
BOARD

7555 East Hampden Avenue
Number 412
Denver, Colorado 80231
Phone: 303.369.7783
Fax: 303.369.7718
www.uspotatoes.com
www.healthypotato.com

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The United States Potato Board (USPB) is pleased to submit comments on the Food and Drug Administration's "Food Labeling; Guidelines for Voluntary Nutrition Labeling of Raw Fruits, Vegetables and Fish; Identification of the 20 Most Frequently Consumed Raw Fruits, Vegetables, and Fish; Reopening of the Comment period."

The USPB represents all potato growers in the United States as the national organization directing demand building programs. We devote considerable resources toward nutrition education programs, which are conducted under USDA oversight and in coordination with it the 2005 Dietary Guidelines for Americans.

The nutrition label is a central part of our communication with the public, and US potato shippers are proud of our nearly 100% participation in the voluntary labeling program.

The US Potato Board (USPB) strongly encourages the FDA to retain the current labeling for the 20 Most Frequently Consumed Raw Fruits and Vegetables. We believe doing so would be consistent with the many positive nutrition initiatives of the USDA already in progress.

Early this year the USDA released the *2005 Dietary Guidelines for Americans*, which form the basis of federal food, nutrition education and information programs, and the corresponding Food Guidance System (i.e., MyPyramid) (1,2). We applauded the effort undertaken by the USDA in creating a set of *Guidelines* based on the latest research. To do so, the USDA assembled a Dietary Guidelines Advisory Committee of 14 national nutrition, exercise, health and obesity experts to conduct an evidence-based review of diet and health. Rather than simply revising the existing Guidelines, the committee had the challenging and demanding task of reviewing current research for evidence upon which to base their report.

The results of the Committee's intensive research review were clear – Americans need to consume *more* vegetables and fruit to reduce the risk of chronic disease. The *Guidelines* recommend the American diet be based on the USDA Food Guide and DASH (Dietary Approach to Stop Hypertension) eating plans (1,2). The Food Guide and DASH eating plans emphasize the consumption of nutrient-dense foods that come primarily from fiber-rich vegetables, fruit and whole grains.

We believe the FDA's proposed changes for food labeling to the 20 Most Frequently Consumed Raw Fruits and Vegetables would undermine the positive messages of the USDA since they would mean the loss of positive nutrition content claims for several vegetables and fruits that are currently considered to be the "gold standard" of nutrition among consumers. The announcements of the

Guidelines and *MyPyramid* both received widespread national media attention. We would hope the FDA would want to align with the USDA's positive recommendations to educate the public about eating right.

Recommendations set forth in the *Dietary Guidelines* that support the inclusion of higher amounts of vegetables and fruits in American's eating patterns include:

1. *Food groups to encourage*: The guidelines recommend consuming 2 cups of fruits and 2.5 cups of vegetables per day (~9 servings). Clearly this goal would appear less daunting if consumers learned of the many positive attributes of vegetables and fruits through nutrient content claims. **If these claims are weakened, the recommendation to eat more fruits and vegetables will not be as compelling or motivating to consumers.** Changing the existing nutrition labels for several key fruits and vegetables will cause them to weaken their perceived nutrient value, in many cases from being an "excellent source" to a "good source" or in some cases dropping a micronutrient claim altogether. **This situation could cause only fortified processed foods to be able to use the claim "excellent source" for some nutrients. Do we really want processed, fortified foods to take the place of whole, natural foods as being the best sources of critical nutrients?** We do not believe that this serves the public's welfare when time after time science has shown that a diet rich in fruits and vegetables can stave off chronic diseases. Many consumers only eat fruits and vegetables because they believe them to be the best source of nutrients. Let's not lose this powerful motivation.
2. *Adequate nutrients within calorie needs*. The guidelines recommend that individuals meet recommended nutrient intakes within energy needs by adopting a balanced eating pattern such as the USDA Food Guidance System or the DASH eating plan. Vegetables and fruits are naturally nutrient dense, (i.e., foods providing significant amounts of vitamins and minerals with relatively few calories). And vegetables and fruits are sources of "nutrients of concern" (i.e., nutrients most likely to be consumed by the general public in amounts low enough to be of concern) identified by the *Dietary Guidelines*. These included vitamin E, calcium, magnesium, potassium and fiber (1).
 - Research suggests that a key nutrient for the efficacy of the DASH diet is potassium. A study on the sources of nutrients in the DASH diet found that fruits were the top source of potassium and vegetables the third highest source for people on the DASH diet, and vegetables were the second highest source of potassium for people on the control diet (3). **Many vegetables and fruits contain significant levels of potassium, however, under the proposed label changes consumers wouldn't learn this fact.** The role of potassium in managing blood pressure was recognized last year when the National Academy of Sciences increased the recommended daily intake (RDI) for potassium to 4.7 g/day (4). This was a significant increase from previous recommendations and based largely on convincing evidence of potassium's role in controlling hypertension and preventing stroke, conditions affecting 50 million, or one in four Americans (4-6). Since approximately 30% of people with hypertension are unaware of their condition and only 34% those with hypertension have it under control, increasing potassium intake would have a powerful impact on blood pressure, stroke, and possibly heart disease (6). Unfortunately,

research indicates that most American adult women are getting little more than half the recommended amount and men's intake is only slightly better (4).

- In addition, consuming nutrient dense foods that are satiating has been recommended for weight control (7, 8). A study on the satiety of foods found that protein, fiber, and water contents correlated positively with satiety scores (9). Vegetables and fruits contain fiber and water and some, such as the potato, score very high as satiating foods (9). This is yet another reason to encourage intake of vegetables and fruits.
3. *Carbohydrates*: The focus of the carbohydrate recommendation is on increasing fiber and limiting the intake of added/refined sugars. Fiber-rich foods recommended by the Guidelines include primarily fruits, vegetables whole grains and legumes. As mentioned previously, several vegetables and fruits would lose their nutrient content claims for fiber under the proposed labeling.
 4. *Sodium and Potassium*: The new guidelines make specific recommendations regarding sodium and potassium intakes, i.e., lower sodium intake and increase potassium intake. Vegetables and fruits are naturally low in sodium and many are a significant source of potassium. This is yet another reason to uphold the current labeling values so that the nutrient content claims for potassium would be retained.

One final point we'd like to make pertains to the seasonal variance in nutrient content of fresh produce and the impact this has on data collection. It is well-known that nutrient content of fruits and vegetables vary seasonally and can be impacted significantly by such factors as harvest and storage times. For example, potatoes are a year-round crop and are grown in every state in the nation. Wide variances in nutrients can occur from month to month, based on length of time in storage, as well as between varieties. Thus, to accurately measure nutrient content of potatoes it would require several measurements spanning different seasons, which was not done when collecting the data currently under consideration by the USDA. **We see no compelling reason to have one set of data negatively impact a nutrition label that has been acceptable to your agency for the past 10 years.**

We hope this information provides you with ample evidence to support the retention of the current labeling values for the 20 Most Frequently Consumed Raw Fruits and Vegetables. We believe doing so would assist the USDA in its campaign to improve the dietary patterns for Americans to prevent chronic disease.

The USPB appreciates the opportunity to present these comments. We commend the agency for its thorough review of this and other food issues. Please do not hesitate to call upon us if we can be of further assistance. We look forward to working with you



Timothy O'Connor, President and CEO

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2. Center for Nutrition Policy and Promotion, U.S. Department of Agriculture. www.mypyramid.gov
3. Pao-Hwa L, Aickin M, Champagne C, Craddick S, Sacks FM, McCarron P, Most-Windhauser MM, Rukenbrod F, Haworth L. Food group sources of nutrients in the dietary patterns of the DASH-Sodium trial. *J Am Diet Assoc.* 2003;103:488-496.
4. National Academy of Sciences. *Dietary Reference Intakes for Fluid and Electrolytes.* 2004. <http://www.nap.edu>
5. Adams PF, Hendershot GE. Current Estimates from the National Health Interview Survey 1996. National Center for Health Statistics. *Vital and Health Statistics Series 10*, no. 200 (Hyattsville, MD: 1999).
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8. Rolls BJ, Bell EA. Dietary approaches to the treatment of obesity. *Med Clin North Am.* 2000;84:401-418.
9. Holt SHA, et al. A satiety index of common foods. *Eur J Clin Nutr.* 1995;49:675-690.