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Joint Comments on the USDA's Topic and Question Identification Stage Of the Dietary Guidelines (2020-2025)

The undersigned organizations are all in agreement on one significant point – portion control and portion balance must play a key role in the 2020-2025 *U.S. Dietary Guidelines*. Despite an array of consumer education efforts, including mandatory nutrition labeling on food packages and, more recently, on restaurant menus, the obesity epidemic remains dire. Currently, more than two out of three Americans are overweight or obese.¹ This is in part due to an increase over the last four decades in the portion sizes of meals, snacks, and beverages – an increase documented by academic researchers for food and beverage products across the spectrum.^{2,3,4}

¹ <https://www.niddk.nih.gov/health-information/health-statistics/overweight-obesity>.

² Harnack LJ, Jeffery RW, Boutelle KN. *Temporal trends in energy intake in the United States: an ecologic perspective*. Am J Clin Nutr 2000; 71:1478-84.

³ Young LR, Nestle M. *The contribution of expanding portion sizes to the US obesity epidemic*. AM J Public Health 2002;92:246-9.

⁴ Young LR, Nestle M. *Expanding portion sizes in the US marketplace: implications for nutrition counseling*. J Am Diet Assoc 2003;103:231-4.

One promising, and we think underutilized, strategy for tackling the obesity epidemic is helping consumers understand and implement appropriate portion control. The importance of portion control is recognized by various leading authorities, including the American Heart Association,⁵ the American Cancer Society,⁶ and CDC’s National Center for Chronic Disease Prevention and Health Promotion.⁷ The Mayo Clinic stresses visual cues for portion size on its Healthy Lifestyles website.⁸ In fact, the National Heart, Lung and Blood Institute of the National Institutes of Health has featured a web page called “Portion Distortion,” for decades that prompts users to reflect on how much portion sizes have expanded over time.⁹ In a 2014 report, the McKinsey Global Institute found that interventions to control portion size – such as reducing portion sizes of packaged foods, fast food, and high-calorie beverages – could be the single most cost-effective measure leading to reduced obesity.¹⁰

Nevertheless, the current version of the *Dietary Guidelines* merely mentions portion size as an afterthought in strategies to improve diets and fight obesity, with the concept not even mentioned in the guidelines’ executive summary.¹¹ Larger portion sizes have clearly contributed to increases in the rates of overweight and obesity.¹² We therefore urge the Dietary Guidelines Advisory Committee, once they are appointed and convened, to focus on portion control as a key strategy to address the rise of obesity and related dietary diseases.

As America’s leading source of nutrition advice, and the foundation of federal food, nutrition, and health policies and federal nutrition education materials, there is a pressing need for clearer and stronger emphasis on the importance of portion control in the 2020-2025 edition of the *Dietary Guidelines*.

⁵ <http://www.heart.org/en/healthy-living/healthy-eating/eat-smart/nutrition-basics/portion-size-versus-serving-size>.

⁶ <https://www.cancer.org/healthy/eat-healthy-get-active/take-control-your-weight/controlling-portion-sizes.html>.

⁷ https://www.cdc.gov/nccdphp/dnpa/nutrition/pdf/portion_size_research.pdf.

⁸ <https://www.mayoclinic.org/healthy-lifestyle/weight-loss/multimedia/portion-control/sls-20076148>.

⁹ <https://www.nhlbi.nih.gov/health/educational/wecan/eat-right/portion-distortion.htm>.

¹⁰ https://www.mckinsey.com/~media/McKinsey/Business%20Functions/Economic%20Studies%20TEMP/Our%20Insights/How%20the%20world%20could%20better%20fight%20obesity/MGI_Overcoming_obesity_Executive_summary.ashx

¹¹ 2015-2020 *Dietary Guidelines for Americans* • Chapter 3 — Page 66,

https://health.gov/dietaryguidelines/2015/resources/2015-2020_Dietary_Guidelines.pdf.

¹² M. Barbara E. Livingstone L. Kirsty Pourshahidi. *Portion Size and Obesity*. *Advances in Nutrition*, Volume 5, Issue 6, 1 November 2014, Pages 829–834, <https://doi.org/10.3945/an.114.007104>.

Already, some in the food industry are taking efforts to support consumers to make informed choices. For example, the National Confectioners Association has launched the Always A Treat Initiative.¹³ A central aspect of this voluntary industry effort is providing consumers with more choices in smaller portion sized packages. Because of leadership from the largest companies, there is strong directional alignment developing across the confectionery industry to offer more individual sized products in sizes that contain 200 calories or less per pack.

Industry participants in the beverage sector – represented by the American Beverage Association – have committed to offering a wider variety of smaller portion sizes to their range of products as one aspect of the Balance Calories Initiative.

The frozen food industry – represented by the American Frozen Food Institute – offers a plethora of portion-controlled meal options to help consumers make individual choices that meet their unique needs and support a healthy and active lifestyle.

Similarly, the Sustainable Food Policy Alliance (SFPA) has stated in its presentation on FDA’s Nutrition Innovation Strategy, “Consumer education should focus on portion size and number of servings of foods, beverages, and meals within a healthy eating pattern, rather than education around calories and serving size only.”¹⁴

The founding members of the SFPA have begun increasing nutrient density, lowering calorie counts per serving size across the diverse range of their products, and updating their packaging to contain smaller portions that encourage saving some for later.

This focus on smaller portions will be even more effective if levels of “nutrients to limit” and “nutrients to encourage” in nutrient profiles are based on the category’s Reference Amount Customarily Consumed (RACC) and are prorated in the case of portions that are smaller than the RACC.

¹³ <https://alwaystreat.com/>.

¹⁴ <https://foodpolicyalliance.org/news/comments-submitted-in-support-of-fdas-nutrition-innovation-strategy/>.

Grocery Manufacturers Association has long supported the need for portion recommendations when developing achievable and practical dietary guidance.

The Always A Treat Initiative, Balance Calories Initiative, and the SFPA's approaches are but three examples of how industry can help consumers control portion size. These programs represent cost-effective measures to combatting obesity, but this is only a start and the concept of portion control is conspicuously missing from the key recommendations in the 2015-2020 *Dietary Guidelines*. This simple step to improving public health should not be marginalized in the forthcoming edition of the *Guidelines*; rather it should be one of the key points stressed by the Dietary Guidelines Advisory Committee and form a cornerstone of the *Dietary Guidelines 2020-2025*.

We look forward to participating in the deliberations that will lead to the new *Dietary Guidelines* and would be pleased to provide further information.

Respectfully submitted,

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Additional organizations supporting this letter include:

American Frozen Food Institute
American Beverage Association
Grocery Manufacturers Association
National Confectioners Association
Sugar Association
Sustainable Food Policy Alliance

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