



NATIONAL POTATO COUNCIL

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January 17, 2024

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Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary
Department of Health and Human Services
1101 Wootton Parkway, Suite 420
Rockville, Maryland 20852

RE: 2025 Dietary Guidelines Advisory Committee (Docket No. HHS-OASH-2022-0021-0001)

The National Potato Council (NPC) appreciates the opportunity to provide input to inform the work of the Dietary Guidelines Advisory Committee (DGAC) (Docket No. HHS-OASH-2022-0021-0001). NPC provides a unified voice for U.S. potato growers and represents the interests of the U.S. potato industry on federal and international issues.

- I. Potatoes are horticulturally a vegetable, are a source of essential nutrients in the diet, and should be maintained in the vegetable category within dietary recommendations.
- II. Recommendations for servings of starchy vegetables, specifically potatoes, should be maintained. Research shows that potatoes are a “springboard” vegetable that, when paired with other less-consumed vegetables, can help increase overall vegetable consumption.
- III. Potatoes are foundational to many cultural eating patterns in America and can help all Americans meet their nutrient recommendations.

Below are specific points that NPC would like to raise for consideration by the DGAC to inform the development of the 2025-2030 DGAC report.

I. **Potatoes are horticulturally a vegetable, are a source of essential nutrients in the diet, and should be maintained in the vegetable category.**

Potatoes are an important vegetable in the American diet. USDA has appropriately classified potatoes as vegetables due to their physical characteristics.¹ From a scientific/horticultural perspective, potatoes are correctly classified as vegetables.

Additionally, their nutrient benefits align with most closely with vegetables. Specifically, potatoes provide a source of essential nutrients, including vitamin C, vitamin B6, dietary fiber and magnesium, and iron, as well as important phytonutrients. One medium (5.3 oz.) potato with the skin provides 620 mg of potassium (a “good source” based on the daily value), 27 mg of vitamin C (an “excellent source” based on the daily value), 0.2 mg of vitamin B6 (a “good source” based on the daily value) and 2 grams of fiber per serving.² As the DGAC advances the work on food pattern modeling and considers recommendations within the DGAC report, potatoes should be maintained in the vegetable category within dietary recommendations.

II. **Recommendations for servings of potatoes should be maintained as research shows they are a “springboard” vegetable.**

Although vegetables are an important component of a healthy dietary pattern, they are consistently under-consumed. In fact, the average American consumes just 1.6 cups of vegetables compared to the recommended 2 to 4 cups per day, and consumption continues to decline.^{3,4,5} According to the 2020-2025 *Dietary Guidelines for Americans* (DGA), most people are not eating enough fruit and vegetables by age 2.⁶ This is a particular problem for school-aged children, as vegetables are often not the preferred part of a meal, leading them to fall short on recommendations overall.^{7,8} Potatoes can help address this gap. **That is because potatoes are a “springboard” vegetable. As outlined below, research shows that serving potatoes can encourage individuals to eat other**

¹ <https://www.ams.usda.gov/grades-standards/vegetables>

² Food Data Central. United States Department of Agriculture. Accessed December 28, 2023. <https://fdc.nal.usda.gov/>

³ Produce for Better Health Foundation: *FRUIT & VEGETABLE GAP ANALYSIS: Bridging The Disparity Between Federal Spending & America’s Consumption Crisis. 2022*

⁴ Hoy MK, Clemens JC, Moshfegh AJ. Intake of vegetables by Children and Adolescents, What We Eat in America, NHANES 2017-2018. Food Surveys Research Group Dietary Data Brief No. 40. Published June 2021. https://www.ars.usda.gov/ARSUserFiles/80400530/pdf/DBrief/40_Vegetable_consumption_children_1718.pdf.

⁵ Ansai N, Wambogo EA. Fruit and vegetable consumption among adults in the United States, 2015–2018. NCHS Data Brief, no 397. Hyattsville, MD: National Center for Health Statistics. 2021. DOI: [https://dx.doi.org/10.15620/cdc:100470external icon](https://dx.doi.org/10.15620/cdc:100470external%20icon).

⁶ U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans, 2020-2025*. 9th Edition. December 2020. Available at [DietaryGuidelines.gov](https://www.dietaryguidelines.gov).

⁷ Capps et al. Examining vegetable plate waste in elementary schools by diversity and grade. *Health Beh and Policy Rev.* 2016;3(5):419-428(10).

⁸ Wambogo, E.A.; Ansai, N.; Ahluwalia, N.; Ogden, C.L. *Fruit and Vegetable Consumption among Children and Adolescents in the United States, 2015–2018*; NCHS Data Brief; National Center for Health Statistics: Hyattsville, MD, USA, 2020; pp. 1–8.

vegetables when paired together on the plate. Conversely, any decrease in recommendations for servings of potatoes could potentially decrease vegetable consumption further.

Within federal nutrition programs, for example, serving potatoes along with less frequently consumed vegetables helps introduce children to other types of vegetables, increase school breakfast participation, and decrease food waste.

- A recent study published in *Nutrients* in 2023 suggests that kids who eat potatoes during school meals are more likely to eat more total vegetables. Study findings report that when kid-friendly Potato Smiles™ (happy faces made with mashed potatoes and sunflower oil, with a slightly crunchy exterior and soft interior) were combined with peas and carrots in a school meal setting, they ate more peas and carrots than when they were served alongside a separate bread roll. Furthermore, the change in total calories and fat was insignificant, and any additional fat was predominantly unsaturated.⁹
- A 2016 study conducted at Texas A&M University demonstrated that pairing entrées with popular vegetables such as white potatoes—served as oven-baked French fried potatoes, tater tots, and potato wedges—resulted in the least amount of plate waste.¹⁰

Combining potatoes with other vegetables, therefore, can be an effective way to increase overall vegetable consumption and increase diet quality overall.

- In 2021, a study by Dr. Sanjiv Agarwal and Dr. Victor Fulgoni found that consumption of potatoes (baked or boiled, mashed potatoes, fried potatoes, and potato chips) was associated with higher diet quality, nutrient intake, and adequacy and therefore encouraging potato consumption may be an effective strategy for improving nutritional status. Potato consumers also had higher intake of energy, dietary fiber, protein, copper, magnesium, phosphorus, potassium, selenium, sodium, zinc, niacin, vitamin B6, vitamin C, vitamin K, and total choline than non-consumers.¹¹

Potatoes are also a versatile and inexpensive way to increase diet quality. They are prepared and consumed in a variety of forms, including baked, boiled, mashed, and fried, and are available in shelf-stable versions (e.g., potato flakes).

- A 2013 analysis examined the nutrient density per unit cost of the 46 most frequently consumed vegetables as part of the National School Lunch Program (NSLP) and found that potatoes and beans were the least expensive sources of not only potassium but also fiber. Specifically, potatoes and beans provide the most nutrients per penny among vegetables included in the program. Potassium-rich white potatoes were almost half the cost of most

⁹ Hernandez Sanchez MG, Bellini S, Christensen WF, Jefferies LK, LeCheminant JD, Patten EV, Redelfs AH, Stokes N, Wang J, Rennick M, et al. The Effects of Potato Presentation on Vegetable Intake in School-Aged Children: A Cross-Over Study. *Nutrients*. 2023; 15(21):4496. <https://doi.org/10.3390/nu15214496>

¹⁰ Capps et al. Examining vegetable plate waste in elementary schools by diversity and grade. *Health Beh and Policy Rev*. 2016;3(5):419-428(10).

¹¹ Agarwal, S.; Fulgoni, V.L., III. Intake of Potatoes Is Associated with Higher Diet Quality, and Improved Nutrient Intake and Adequacy among US Adolescents: NHANES 2001–2018 Analysis. *Nutrients* 2021, 13, 2614. <https://doi.org/10.3390/nu13082614>

other vegetables, making it more affordable to meet key dietary guidelines for good health.¹²

Potatoes are nutrient-dense, easy to prepare, inexpensive, and American’s favorite vegetable.¹³ Not only can potatoes be served individually, but they are a “springboard vegetable,” meaning they are easily paired with other less consumed vegetables. Through these pairings, potatoes play a key role in enhancing vegetable consumption and improving diet quality.

We urge the DGAC to consider effective strategies to increase vegetable consumption within DGA recommendations. Specifically, the DGAC should maintain recommendations for starchy vegetable servings like potatoes.

III. Potatoes are foundational to many cultural eating patterns in America and can help all Americans meet their nutrient recommendations.

According to a 2023 report on U.S. per capita consumption, Americans love potatoes, consuming roughly 117 pounds per year.¹⁴ By frequency and volume of consumption, potatoes are a top consumed vegetable by Americans.¹⁵ This is consistent across genders (male and female); households with and without kids; and generations (Gen Z, Millennials, Gen X, and Boomers.¹⁶

Critically, potatoes are a vegetable that is consumed across a range of cultural eating patterns. According to Oldways data published in 2023, potatoes are commonly found in Asian-, African-, Latin American, and Mediterranean-heritage diets.¹⁷ In a new Potatoes USA study, 53% of Americans reported that potatoes are the most foundational vegetable to their culture when compared to other vegetables (i.e., onions, tomatoes, pinto/black/white beans, leafy greens, green beans, carrots, broccoli, and sweet potatoes). This finding was consistent across most race/ethnic groups, with at least half of white (54%), Hispanic (53%), Black (52%), and Native (50%) Americans reporting potatoes as foundational to their family and cultural food traditions.¹⁸

¹² Drewnowski A, Rehm CD. Vegetable cost metrics show that potatoes and beans provide most nutrients per penny. *PLoS One*. 2013 May 15;8(5):e63277

¹³ Consumer Attitude and Usage Study. Potatoes USA. Published 2023. Accessed December 28, 2023. <https://potatoesusa.com/wp-content/uploads/2023/05/Consumer-A-U-Handout-2023.pdf>

¹⁴ Knudson, W., & Miller, S. R. Measuring the Economic Significance of the U.S. Potato Industry. February 2023 <https://www.nationalpotatocouncil.org/wp-content/uploads/2023/02/NPCSpudNationReport.pdf>.

¹⁵ U.S. per Capita Food Availability, Economic Research Service (ERS), USDA, 2020. <https://www.ers.usda.gov/data-products/chart-gallery/gallery/chart-detail/?chartId=105364>

¹⁶ 2020 PBH State of the Plate: America’s Fruit & Vegetable Consumption Trends. Snapshot: Potatoes. Produce for Better Health. Published 2021. Accessed December 28, 2023. <https://fruitsandveggies.org/wp-content/uploads/2021/04/2020-PBH-State-Of-The-Plate-Executive-Summary-1.pdf>

¹⁷ Resources. Oldways-Cultural Food Traditions. Accessed December 28, 2023. https://oldwayspt.org/resources/search?keys=foods+and+flavors&items_per_page=12

¹⁸ Meeting Street Omnibus Survey. Meeting Street Insights completed an online nationwide survey among 1,000 adults (aged 18+) on December 15-18, 2023. Respondents were sourced from Dynata’s online general population consumer panel. Standard demographic quotas were set to mirror Census data for region, gender, age, and race; weights were also applied on education level to bring them into line with Census figures. The credibility interval for a sample of N=1,000 is +/-3.53%.

NPC appreciates the DGAC's focus on health equity and its work to ensure that dietary recommendations meet the needs of a range of cultural foodways. Potatoes fit into all three healthy eating patterns defined in the 2020 DGAs (Vegetarian, Mediterranean, and U.S. Healthy), as well as others, like Dietary Approaches to Stop Hypertension (DASH). As the DGAC looks for more flexibility within dietary patterns to accommodate cultural preferences, we believe that potatoes can help all Americans meet their nutrient recommendations and improve their overall dietary quality.

Conclusion

NPC appreciates the DGAC's consideration of the points outlined above while working to develop the 2025 DGAC report. We look forward to participating in each phase of the development process of the 2025-2030 DGA.

Thank you for the opportunity to participate in this process.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Kam Quarles". The signature is fluid and cursive, with the first name "W." and last name "Quarles" clearly visible.

W. Kam Quarles
Chief Executive Officer
National Potato Council