**NATIONAL POTATO COUNCIL**
50 F Street, NW, Suite 900
Washington, DC 20001
(202) 682-9456 phone
www.nationalpotatocouncil.org

March 06, 2024

Janet M. de Jesus, MS, RD
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.

NPC submits the following comments to build upon those submitted to the DGAC in November 2023 and January 2024.

I. **In reference to the Food Pattern Modeling question on modifying the vegetables food group and subgroup quantities [link]:** 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. NPC asks for additional transparency on the "scenarios" outlined within the vegetable protocol that could be modeled in the future and asks that the DGAC consider modeling situations where vegetable recommendations overall are increased.

II. **In reference to the Food Pattern Modeling question on quantities of foods and beverages lower in nutrient density [link]:** Within questions related to "nutrient density," the DGAC focuses heavily on the negative components of foods instead of overall nutrient density and the ***positive*** components a food could contribute (e.g., potassium and dietary fiber). We ask the Committee to ***also*** consider how foods are actually and commonly consumed within each food and subgroup and ***the overall positive nutrients*** they bring to the table. Potatoes in any form can be nutrient-dense, fit within dietary patterns, and are a food enjoyed by the American public.

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. In reference to the Food Pattern Modeling question: What are the implications for nutrient intakes when modifying the Vegetables food group and subgroup quantities within the Healthy U.S.-Healthy U.S.-Style Dietary Pattern?**

***The DGAC should maintain recommendations for servings of starchy vegetables within the vegetable category (5 cups per week)***

NPC notes that within the "vegetable protocol," the DGAC is modeling several scenarios, including 1) modeling incremental reductions of all subgroups while keeping overall subgroup proportions constant; 2) modeling holding subgroup proportions equal (at 20% of vegetable recommendations); and 3) modeling sceneries where total vegetable consumption is from only one subgroup, holding all other subgroups at zero.

NPC recognizes that the Committee is working to understand the complexity of how nutritional recommendations can be achieved with a range of vegetable consumption patterns. However, NPC strongly recommends that the DGAC maintain the current recommendations for starchy vegetables within the vegetable category of 5 cups per week (for the 2,000-calorie level of the 2020 Health U.S (HUSS) Dietary Pattern. As recognized within the protocol (see page 5), we believe that existing and well-established subgroup amounts are well positioned, given usual intake and availability, to help Americans meet nutrient needs as well as consume other vegetables.[1]

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.[2,3,4] This is particularly problematic because, as noted by the protocol, vegetables are a major source of key nutrients like "vitamin A, vitamin B6, potassium, copper, and dietary fiber, and a substantial contributor to calcium, iron, magnesium, vitamin C, and folate in the diet."

As noted by this protocol, "a recommendation to consume vegetables has always been a core component of the Dietary Patterns," but the recommendations for vegetable subgroups have evolved. Historically, food group and subgroup calculations have been determined to ensure that Americans meet nutrient recommendations and align with usual intake and consumption levels. The current reference pattern contains 17.5 cup equivalents of vegetables a week. Unfortunately, the U.S. population consistently does not meet intake recommendations for any of the vegetable subgroups, including Starchy Vegetables. As a result, Americans continue to fall short on the intake of critical nutrients like potassium and dietary fiber.

---

[1] https://www.dietaryguidelines.gov/sites/default/files/2024-02/2025_DGAC_FPM_Q2_Protocol_Vegetables_508c.pdf

[2] Produce for Better Health Foundation: FRUIT & VEGETABLE GAP ANALYSIS: Bridging The Disparity Between Federal Spending & America's Consumption Crisis. 2022

[3] 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.

[4] 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.

Potato consumption can specifically address these nutrient gaps. 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.[5] The positive contribution of key nutrients is true of potatoes when they are prepared in all forms. If consumed at recommended serving levels (based on recommendations from the Healthy U.S.-Style Dietary Pattern), potatoes would contribute 11% of daily needs for potassium, 10% vitamin B6, 9% copper, 8% thiamin, 7% niacin, and 6% fiber and magnesium.[6] This is notable as this data represents the nutrient content of potatoes **without** the peel, commensurate with the 2020 DGAC Food Pattern Modeling Report.[7] Based on a recent Potatoes USA survey[8], most Americans consume the skin/peel of the potato (85% - baked; 76% - roasted; 71% - mashed; and 58% - boiled). Both fiber and potassium consumption amounts are increased when the skin is eaten**

***We note that this is a critical consideration for the DGAC and ask that they ensure that appropriate FoodData Central codes are utilized to capture the actual contribution of potassium and fiber that potatoes with the skin provide to the diet and utilize this information within the FPM research.*

Not only are potatoes the most popular option within the starchy vegetable subgroup, but they are also the most commonly consumed and accessible option of among the top "Food Sources of Potassium" within the Dietary Guidelines. While other food sources from the chart on DietaryGuidelines.com may be higher in potassium (see table below), these options are not commonly or frequently consumed by Americans.

[5] Food Data Central. United States Department of Agriculture. Accessed December 28, 2023. https://fdc.nal.usda.gov/

[6] Based on a food pattern modeling simulation commissioned by Potatoes USA and conducted by Nutrition Impact LLC.

[7] https://www.dietaryguidelines.gov/2020-advisory-committee-report/food-pattern-modeling

[8] 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%.

**Potassium: Nutrient-dense[a] Food and Beverage Sources, Amounts of Potassium and Energy per Standard Portion**

| FOOD[bc] | STANDARD PORTION[d] | CALORIES | POTASSIUM (mg) |
|---|---|---|---|
| **Vegetables** | | | |
| Beet greens, cooked | 1 cup | 39 | 1309 |
| Fufu, cooked | 1 cup | 398 | 1080 |
| Lima beans, cooked | 1 cup | 209 | 969 |
| Swiss chard, cooked | 1 cup | 35 | 961 |
| Potato, baked, with skin | 1 medium | 161 | 926 |

We believe that any decreases in recommendations to the starchy vegetable subgroup would have detrimental impacts on the amount of potassium and fiber consumed by Americans overall. Despite starchy vegetables' positive nutrient contribution, the subgroup already faces challenges from limitations in classification within nutrition research, federal feeding programs, and consumer perception. For example, as noted in past comments during the 2020 DGAC process, the terms “starch” and " starchy” are often associated with negative connotations by consumers. Within the FPM work, the DGAC should ensure that they do not unintentionally discourage the consumption of certain vegetables (starchy) over other vegetables (non-starchy). Instead, efforts should focus on increasing the consumption of vegetables overall.

NPC notes that potatoes are also a “springboard” vegetable, meaning they are easily paired with other less-consumed vegetables and can help facilitate the consumption of other vegetable subgroups and increase diet quality overall. As previously presented to the DGAC in comments in January 2024, **research shows that serving potatoes can encourage individuals to eat other vegetables when paired together on the plate.** Conversely, any decrease in recommendations for servings of potatoes could potentially decrease vegetable consumption further. **We, therefore, ask the DGAC to maintain recommendations for the starchy vegetable subgroup within their assessment.**

***Transparency on future modeling scenarios within the vegetable protocol***

NPC notes that while several modeling scenarios are outlines clearly within the tables in the protocol, the examples in the tables are “just one example of several scenarios that will be modeled.” NPC asks the DGAC for additional transparency on what these other scenarios will include. **We respectfully request additional information on all of the scenarios to be modeled by the DGAC within this protocol.**

***The DGAC could consider modeling vegetable increases***

Finally, NPC notes that while the DGAC is modeling situations where vegetable subcategories are reduced, they do not appear to be modeling situations where total vegetable consumption is **increased.** The protocol notes that "Past Committees examining the relationship between dietary patterns and health outcomes across the lifespan found consistent evidence that dietary patterns associated with beneficial outcomes **include higher intakes of vegetables,** fruits, legumes, whole grains, low- or non-fat dairy, lean meat and poultry, seafood, nuts, and unsaturated vegetable oils and lower intakes of red and processed meats, sugar-sweetened foods and drinks, and refined grains."[9] **The DGAC could consider modeling situations where vegetable recommendations overall are increased.**

**II. In reference to the Food Pattern Modeling question: What quantities of foods and beverages lower in nutrient density can be accommodated in the USDA Dietary Patterns while meeting nutritional goals within calorie levels?**

***Within questions related to "foods and beverages lower in nutrient density," the DGAC should consider how foods are actually and commonly consumed within each food and subgroup and include the overall positive nutrients they bring to the table***

In November 2023, NPC provided the DGAC feedback on "*Should foods and beverages with lower nutrient density (i.e., those with added sugars, saturated fat, and sodium) contribute to item clusters, representative foods, and therefore the nutrient profiles for each food group and subgroup used in modeling the USDA Dietary Patterns?"*

As NPC reviews the new research protocol "*What quantities of foods and beverages lower in nutrient density can be accommodated in the USDA Dietary Patterns while meeting nutritional goals within calorie levels,"* we continue to have concerns with the DGAC's approach to considerations for "foods of lower nutrient density." Notably, the DGAC focuses heavily on the negative components of foods instead of the positive components a food could contribute (e.g., potassium and dietary fiber).

Within FPM, nutrient-dense representative foods generally have the least amounts of added sugars, saturated fats, and/or sodium. However, nutrient density is more than just the contribution of negative nutrients to the diet. For example, potatoes are consumed in a variety of forms, including baked, boiled, mashed, fried, and chips. Though some forms may contribute more saturated fat than others to the diet, each form contributes key nutrients to the diet. In all forms, potatoes can be nutrient-dense, fit within dietary patterns, and are a food enjoyed by the American public.

The FPM work should account for how foods are actually and commonly consumed within each food and subgroup and **include the overall positive nutrients** that they bring to the table. We urge the DGAC to consider this within the question, "What quantities of foods and beverages lower in nutrient density can be accommodated in the USDA Dietary Patterns while meeting nutritional goals within calorie levels?"

**Conclusion**

[9] https://www.dietaryguidelines.gov/sites/default/files/2024-02/2025_DGAC_FPM_Q2_Protocol_Vegetables_508c.pdf

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,

W. Kam Quarles
Chief Executive Officer
National Potato Council