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Designated Federal Officer (DFO) 2015 DGAC Richard D. Olson, M.D., M.P.H. Office of Disease Prevention and Health Promotion/OASH U.S. Department of Health and Human Services 1101 Wooton Parkway, Suite LL100 Tower Building Rockville, MD 20852

Colette I. Rihanne, M.S. R.D., Director, Nutrition Guidance and Analysis Division Center for Nutrition Policy and Promotion U.S. Department of Agriculture 3101 Park Center Drive, Room 1034 Alexandria, VA 22302

Re: 2015 Dietary Guidelines for Americans

To Whom It May Concern:

We appreciate the opportunity to submit comments regarding the 2015 Dietary Guidelines for Americans currently under development by the Dietary Guidelines Advisory Committee (DGAC) as appointed by the Secretaries of Health and Human Services (HHS) and Agriculture (USDA) and mandated under Section 301 of Public Law 101-445 (7 U.S.C. 5341, the National Nutrition Monitoring and Related Research Act of 1990, Title III).

The DGAC is tasked with developing recommendations based on the preponderance of current scientific and medical knowledge. The DGAC examines the current Dietary Guidelines for Americans (DGA 2010), takes into consideration new scientific evidence and current resource documents, and develops a report to the Secretaries of HHS and USDA that will serve as the basis for developing the Dietary Guidelines for Americans 2015.

The American Spice Trade Association (ASTA) brings to your attention the role spices can play in improving healthful eating choices. ASTA urges the DGAC to consider the role of spices in improving nutrition and respectfully requests that the overarching concepts already identified in the DGA 2010 be further expanded. Appendix 2 of the DGA 2010 recognized the roles of spices as a potential strategy to influence consumer behavior to reduce sodium intake. ASTA urges the DGA 2015 to consider the following information when developing recommendations

encouraging a healthful diet that focuses on food and beverages to help achieve and maintain a healthy weight, promote health, and prevent disease.

## American Spice Trade Association

The American Spice Trade Association (ASTA) was established in 1907 to provide representation for the American spice trade. Its members include companies involved in all aspects of the spice trade – importing, growing, processing, and marketing at the wholesale and retail levels. On behalf of its members, ASTA works with federal and state regulators and legislators and assists its members in addressing a variety of technical issues to help members provide an adequate supply of safe and wholesome spices for their industrial, food service and consumer customers.

## ASTA supports development of the Dietary Guidelines for Americans

ASTA supports the work of the Dietary Guidelines Advisory Committee that is charged with developing policy recommendations that will be used to form the basis of Federal nutrition policy, education, outreach, and food assistance programs. The U.S. government plays a critical role in steering consumers to healthful eating habits through nutrition assistance policy and education of critical knowledge on healthy eating behaviors.

<u>Dietary Guidelines for Americans 2010 identify spices as a potential tool for improving eating</u> choices and sodium reduction

One of the overarching concepts identified in the DGA 2010 was to focus on nutrient-dense foods and beverages. Specifically:

- Increase intake of foods that are consumed below recommended amounts. For most people, this means choosing more vegetables, fruits, whole grains, fat-free or low-fat milk and milk products, seafood and oils.
- Reduce intake of foods and food components consumed in excess amounts. For most people, this means consuming fewer foods and beverages high in solid fats (sources of saturated and trans fatty acids), added sugars, and sodium (i.e., consume these foods and beverages less often and in small amounts).

Furthermore, spices were mentioned in Appendix 2 of the DGA 2010 as a potential strategy to influence consumer behavior to reduce sodium intake:

• Use little or no salt when cooking or eating. Trade in your salt shaker for the pepper shaker. Spices, herbs, and lemon juice can be used as alternatives to salt to season foods with a variety of flavors.

Spices should be recognized in DGA 2015 as strategy to enhance flavor of nutrient dense foods

As already acknowledged in the DGA 2010, ASTA urges the DGAC to recognize the important role that spices can have on promoting behaviors to increase the consumption of nutrient dense foods and expand this concept to provide greater awareness to all Americans on the benefits spices can play in enhancing the palatability of nutrient dense foods. Utilization of spices can increase consumption of foods such as fruits, vegetables and healthy grains by making them more appealing and taste better. Empirically, food preparation methods including spices tend to

enhance the taste of vegetables, as for example in the Mediterranean style vegetable cooking compared to simply steamed vegetables. (Mayo Clinic 2011)

Limited research has shown that the use of spices also increases the flavor experience of foods that are considered relatively bland, such as vegetables, potatoes, and grains (Cox et al. 1998; Tapsell et al. 2006; Ghirardini et al. 2007). Ideally flavorings do not compromise the nutritional value of the foods by adding calories, fat, or salt. It was recently reported that addition of flavor assists in consumption of vegetables in children (Savage et al. 2013). *The Journal of the Academy of Nutrition and Dietetics* article in May 2013 entitled "the Addition of a Plain or Herb-Flavored Reduced-Fat Dip is Associated with Improved Preschoolers' Intake of Vegetables" states, "These findings suggest that offering vegetables with reduced-fat dips containing familiar herb and spice flavors can increase tasting and thereby promote liking, acceptance, and consumption of vegetables, including vegetables previously rejected or disliked." While the flavored vegetable dips used in this study assisted in improving consumption of vegetables by children, their contribution to the dietary profile may not be consistent with the healthy dietary guidelines promoted by health organizations. Instead, spices and herbs alone may impart a similar benefit without the added disadvantage associated with more complex flavoring products.

Spices should be recognized as an important resource to assist with reduction of sodium intake ASTA urges the DGAC to recognize the important role spices can have on assisting with sodium reduction. There is evidence that the use of spices may assist in the reduction of sodium intake by making food such as fruits and vegetables more appealing.

In a relatively recent review of the benefits of spices as part of a healthy diet, it was recommended that the role of spices as part of a healthy diet should be made more explicit along with recommendations of how to achieve that since "herbs and spices can be used in recipes to partially or wholly replace less desirable ingredients such as salt, sugar and added saturated fat in, for example, marinades and dressings, stir-fry dishes, casseroles, soups, curries and Mediterranean-style cooking. Vegetable dishes and vegetarian options may be more appetizing when prepared with herbs and spices." (Tapsell et al. 2006)

## Summary

ASTA and its members appreciate the opportunity to comment on the Dietary Guidelines for Americans 2015 recommendations under consideration by the DGAC and respectfully requests your consideration of these important points. We would be happy to answer any questions you may have and thank you for the opportunity to comment on this important endeavor.

Sincerely,

Cheryl Deem Executive Director

## **References:**

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