



**CALIFORNIA
DRIED
FRUIT
COALITION**

*Better health and
nutrition for all.*

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June 10, 2011

Donald S. Clark, Secretary
Office of the Secretary
600 Pennsylvania Ave, NW
Washington, DC 20589

Re: **COMMENTS TO THE INTERAGENCY WORKING ON FOOD
MARKETED TO CHILDREN;
PROPOSED NUTRITION PRINCIPLES:
FTC PROJECT No. P094513**

MEMBERS

Public Members

California Date
Commission

California Dried
Plum Board

California Fig
Advisory Board

California Raisin
Marketing Board

Private Members

Hadley Date Gardens

Mariani Packing Co., Inc.

Sun-Maid Growers
of California

Sunsweet Growers Inc.

Valley Fig Growers

Rich Peterson
Executive Director
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Health and Nutrition Specialist
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Dear Mr. Clark,

On behalf of the members of the California Dried Fruit Coalition and their respective farmers, we're pleased to submit our comments for consideration in the above referenced proceeding. The California Dried Fruit Coalition represents California's growers and processors of raisins, dried plums, dried figs and dates. It was formed to communicate the nutritional value and versatility of uses for these traditional dried fruits, *which have no added sugar*, to policy makers and health professionals who influence food purchase decisions.

Traditional dried fruits comprise those where a large portion of their original water content has been removed, either through sun drying (raisins and figs) or through the use of specialized dryers or dehydrators (dried plums). It includes dried apricots, peaches and other dried tree fruits. Traditional dried fruits do not include dried fruits infused with sugar solutions or fruit juice concentrates (dried blueberries, cranberries or cherries), candied dried fruits (dried pineapples) or dehydrated fruits with very low moisture content.

We confine our comments to the four questions listed below:

1. Question 3: Should the Working Group recommendations include setting targets for nutrients to encourage? No.

The key recommendations from 2010 Dietary Guidelines for Americans (DGA)¹ are to increase consumption of certain food groups (e.g. fruits, vegetables,

¹ Dietary Guidelines for Americans 2010 (USDA/DHHS). Available at www.dietaryguidelines.gov

whole grains and seafood). This is because they are major contributors of a number of nutrients (e.g. potassium, fiber, vitamin C, omega-3 fatty acids, etc) **AND/OR** because studies consistently associate consumption of these foods with positive health outcomes:

“Consuming these foods [vegetables, fruits, whole grains ...] is associated with a health benefit and/or with meeting nutrient needs”.

Over the years the DGA has increasingly emphasized eating the right types of foods rather than meeting specific nutrient levels. Defining a set of “nutrient targets to encourage” would undermine DGA’s effort because:

- a) Many whole foods like fresh and dried fruits food would compare unfavorably with foods where the level of a few nutrients can be increased during manufacturing.
- b) Promote pitting one food against another within a food group rather than encouraging consumption of the food group as a whole.
- c) It is the consumption of the **foods** that is associated with reduced risk of chronic disease, with their array of health protective bioactive compounds, not the consumption of a handful of essential nutrients.

2. Question 11: What are the advantages and disadvantages of Option 1 (based on weight) or Option 2 (based on amounts per RACC)?

Our concern with this question is that it does not acknowledge the serving size difference between dried fruits and fresh fruit. According to Option 2, individual foods marketed to children should provide at least 0.5 cups of fruit or fruit juice. This would represent 2 servings of dried fruit according to the USDA’s MyPlate since a serving of dried fruit is a quarter cup.² We strongly recommend that when a measure of fruit is spelled out, the corresponding measure of dried fruit is included. For example: “0.5 cups of fruit or fruit juice or *0.25 (1/4) cup of dried fruit*”.

According to Option 1 an individual food should contain at least 50% by weight of fruit. Nutrients in dried fruits are concentrated as water is removed. For this reason it is often not feasible to use the above proportion in the final product. For example 100% prune juice is only 18.5 – 21 % prune solids by weight. However one serving of prune juice provides approximately the equivalent amount of fiber and potassium as one serving of dried plums and one serving of fresh plums.

² ChooseMyPlate.gov (USDA and Center for Nutrition Policy and Promotion). Available at :<http://www.choosemyplate.gov/foodgroups/fruits.html#>

The importance of dried fruits in meeting dietary recommendations for fruit intake is well established.³ For this reason the DGA have long considered dried fruits as “whole foods” nutritionally equivalent to fresh fruit. Including them as ingredients in other foods is an easy way to get more servings of fruit in the diet. The nutrition principles should reflect this.

3. Questions 16: The Working Group proposal recommends a target for added sugars for foods marketed to children. What are the advantages and disadvantages for the proposal for limiting added sugar as opposed to total sugar content?

Limiting total sugar content of a food would be inconsistent with Nutrition Principle A: “encourage children to choose foods that make a meaningful contribution to a healthful diet.” Practically all energy in fruits comes from naturally occurring sugar. Different fruits would be excluded depending on what criteria are used to determine the sugar limit (grams per 100 grams, grams per serving, grams per RACC, etc). Would we single out bananas, figs, mangos or dates solely because of their sugar content? This would again undermine the efforts of the simple yet clear messages of the DGA: *Eat more of these foods eat less of those.*

We appreciate the Working Group’s attention to our submission.

Sincerely yours,

Rich Peterson
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³ Aksoy, U., Carughi, A, Anderson, J et al. Traditional dried fruits: Valuable tools to meet dietary recommendations for fruit intake. Presented at the 2011 International Nut and Dried Fruit Congress, Budapest. *Available at:* http://www.nutfruit.org/UserFiles/Image/pdf/link1_110504.pdf