

# Back to Balance



October 26, 2015

Dietary Guidelines Communications  
Center for Nutrition Policy and Promotion  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

**Re: Agency Information Collection Activities: Proposed Collection; Comment Request – Generic Clearance for the Development of Nutrition Education Messages and Products for the General Public**

To Whom It May Concern:

The *Back to Balance Coalition*<sup>1</sup> (*Coalition*) brings together food and beverage organizations, health advocacy groups, and nutrition professionals who support balance, variety, and moderation in dietary guidance. The Back to Balance approach to dietary guidance brings forward common sense and respects personal taste preference, cultural relevance, practicality, and the fact that a variety of dietary patterns can be used to achieve a healthy diet. The *Coalition* appreciates the opportunity to comment on the above-referenced information collection.

The *Dietary Guidelines for Americans* are a vital public service to Americans and provide an evidence-based foundation for federal nutrition policy and nutrition education activities. Yet, despite 35 years of dietary guidance, Americans still remain slow to change long-held eating habits.<sup>2</sup> The stubborn gap between recommendations and adoption is likely the result of a constellation of cultural forces, societal norms, family influences, personal long-standing food preferences, changes in meal patterns, food availability, and a lack of understanding as to how to translate dietary guidance into realistic and permanent lifestyle behaviors, among other factors.<sup>2,3</sup> To close the gap, consumer research on how to best improve eating habits, and thus overall health, is critical. The findings from this proposed information collection will enable the Center for Nutrition Policy and Promotion (Center or the agency) to develop messages and resources designed to positively influence consumer behavior.

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<sup>1</sup> Back to Balance Coalition members include the American Association of Meat Processors, American Bakers Association, American Frozen Food Institute, Beer Institute, Can Manufacturers Institute, Canned Food Alliance, Corn Refiners Association, Food Marketing Institute, Grain Foods Foundation, Grocery Manufacturers Association, Healthy Weight Commitment Foundation, National Chicken Council, National Confectioners Association, National Pork Producers Council, National Potato Council, National Restaurant Association, National Turkey Federation, North American Meat Institute, Shelf-Stable Food Processors Association, Snack Food Association, The Sugar Association and the Wheat Foods Council.

<sup>2</sup> Bier D, Derelien D, German J, Katz D, Pate R, Thompson K. Improving compliance with dietary recommendations. *Nutr Today*. 2008;43:180–187.

<sup>3</sup> Rowe S, Alexander N, Almeida N, Black R, Burns R, Bush L, Crawford P, Keim N, Kris-Etherton P, Weaver C. Food science challenge: Translating the Dietary Guidelines for Americans to bring about real behavior change. *J Food Sci*. 2011;76:R29–R37.

According to the International Food Information Council's Food and Health Survey 2015, nearly two-thirds of Americans polled recognize the MyPlate graphic, with 42 percent reporting some knowledge about it.<sup>4</sup> As one of the information collection's purposes is to enhance ChooseMyPlate.gov, the opportunity exists to evaluate how MyPlate affects consumers of different socio-economic classes and ethnicities to better build on existing consumer awareness of this resource and to provide messages that will increase consumer knowledge and application. Further, the information will improve clarity, understandability, and acceptability of resources, messages, and products.

The MyPlate initiative has provided useful messages and practical tips for leading a healthy lifestyle. Its "Ten Tips Nutrition Education Series" has more than two dozen, easy-to-follow tips that provide consumers with ideas and a starting point to make small, achievable changes toward a healthy diet. From eating on a budget to celebrations, these resources translate dietary guidance for the wide variety of Americans' lifestyles and habits.<sup>5</sup> These "tips" consider balance, variety, and moderation and focus on small changes to achieve better health, and are "how to" practical advice to better support Americans in achieving and maintaining a healthy weight, improving health, and preventing disease.

As the U.S. Department of Agriculture found when conducting research to aid development of the 2010 *Dietary Guidelines for Americans* Consumer Messages and New Food Icon, consumers prefer messages that are realistic and take into account small-step approaches. Specifically, "participants preferred messages with a focus on small, realistic and palatable actions they could pinpoint and take to change their current eating behaviors."<sup>6</sup>

Americans lead a wide variety of lifestyles that incorporate an array of foods. Although the consumer research may not be nationally representative, the research and findings should reflect the diversity of the population. The resulting nutrition education should therefore encompass the many different ways to eat healthfully; messages that are realistic, understandable and applicable within the consumer's lifestyle is key to improving health outcomes. The *Coalition* hopes this information collection will result in more educational resources like the "Ten Tips" series.

In summary, the *Coalition* believes all foods in all forms can fit within a healthful, overall dietary pattern if consumed in moderation with appropriate portion size and combined with physical activity. Making nutrition messages, resources and tools practical, affordable, and attainable will help Americans be better equipped to follow recommendations, make better choices, and achieve balance for overall health. To ensure that messages are appropriate, understandable, applicable and relevant, consumer research must be conducted. Thank you for your consideration.

Sincerely,

*Back to Balance Coalition*

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<sup>4</sup> International Food Information Council Foundation. Food & Health Survey 2015. Accessed October 21, 2015. Available at: <http://www.foodinsight.org/sites/default/files/2015-Food-and-Health-Survey-Full-Report.pdf>.

<sup>5</sup> United States Department of Agriculture. Ten tips nutrition education series. Accessed May 4, 2015. Available at <http://www.choosemyplate.gov/healthy-eating-tips/ten-tips.html>.

<sup>6</sup> United States Department of Agriculture. Development of 2010 *Dietary Guidelines for Americans* consumer messages and new food icon: executive summary of formative research. Accessed June 11, 2014. Available at <http://www.choosemyplate.gov/food-groups/downloads/MyPlate/ExecutiveSummaryOfFormativeResearch.pdf>.