NUTRITION COALITION
For evidence-based nutrition policy

March 31, 2023

The Honorable Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Dear Secretary Vilsack,

On behalf of The Nutrition Coalition, I am writing to urge the U.S. Department of Agriculture (USDA) to take swifter and more far-reaching action regarding the USDA's phased approach for reducing added sugars in the recently proposed updates to the School Nutrition Standards.

We urge the USDA to reduce added sugars across the weekly School Meal menus to less than 6% of calories per meal by Fall 2023. This move is supported by the Scientific Report of the 2020 Dietary Guidelines Advisory Committee (DGAC), in which the Committee recommended that Americans reduce their added sugar intake to less than 6% of total energy.

Additionally, this method aligns with the American Heart Association's (AHA) recommendation that children should consume no more than 25 grams of added sugar daily, which is equivalent to less than 6% of their total caloric intake, depending on age.[1]

As no doubt you are aware, the DGAC has consistently relied on research from the AHA for guidance, as demonstrated by the various references and citations in the Scientific Report of the 2020 DGAC.

Given the steep rise in the rates of chronic disease among America's youth, there is no credible reason for the USDA to delay achieving the reduction in sugar consumption until 2027, as currently scheduled.

[1] Vos MB, Kaar JL, Welsh JA, Van Horn LV, Feig DI, Anderson CAM, Patel MJ, Munos JC, Krebs NF, Xanthakos SA, Johnson RK; on behalf of the American Heart Association Nutrition Committee of the Council on Lifestyle and Cardiometabolic Health; Council on Clinical Cardiology; Council on Cardiovascular Disease in the Young; Council on Cardiovascular and Stroke Nursing; Council on Epidemiology and Prevention; Council on Functional Genomics and Translational Biology; and Council on Hypertension. Added sugars and cardiovascular disease risk in children: a scientific statement from the American Heart Association. Circulation. 2017;135:e1017–e1034. doi: 10.1161/CIR.0000000000000439.

Today, more and more children are diagnosed with obesity, pre-diabetes, and fatty liver disease. These chronic conditions were once considered adult health problems, but they now affect children at an alarming rate.

According to the Centers for Disease Control and Prevention (CDC), obesity rates in children and adolescents have more than tripled since the 1970s, and pre-diabetes and fatty liver disease are becoming increasingly common in children. Moreover, one out of three children and adolescents aged 2 to 19 years is overweight or obese, with about 1 in 5 school-aged children affected by obesity.[2] Twenty percent of adolescents live with pre-diabetes.[3] And according to the American Liver Foundation, "Nonalcoholic Fatty Liver Disease (NAFLD), is the most common form of liver disease in children and has more than doubled over the past 20 years." [4]

The implications of these trends are deeply worrisome, as these conditions can profoundly impact a child's quality of life and lead to serious health problems as they get older.

A significant body of scientific literature supports the idea that added sugars are part of the problem.[5] That is why the US Dietary Guidelines for Americans started in 2015 to recommend capping added sugars at 10% of total calories, and the 2020 DGAC recommended lowering that cap to 6%. The 2020 DGAC's Scientific Report explains that the Committee endorsed the lower, 6% limit on added sugars to help ensure complete nutrition while reducing the risk of overeating. The DGAC writes:

> "...[T]he Committee suggests that for adults and children ages 2 years and older, a recommendation of less than 6 percent of energy from added sugars is more consistent with a dietary pattern that is nutritionally adequate while avoiding excess energy intake than is a pattern with less than 10 percent energy from added sugars."[6]

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[2] Fryar CD, Carroll MD, Afful J. Prevalence of overweight, obesity, and severe obesity among children and adolescents aged 2–19 years: United States, 1963–1965 through 2017–2018. NCHS Health E-Stats. 2020.

[3] Andes LJ, Cheng YJ, Rolka DB, Gregg EW, Imperatore G. Prevalence of Prediabetes Among Adolescents and Young Adults in the United States, 2005-2016. JAMA Pediatr. 2020;174(2):e194498. doi:10.1001/jamapediatrics.2019.4498

[4] https://liverfoundation.org/liver-diseases/fatty-liver-disease/nonalcoholic-fatty-liver-disease-nafld/

[5] https://www.cdc.gov/nutrition/data-statistics/added-sugars.html

[6] https://www.dietaryguidelines.gov/sites/default/files/2020-07/ScientificReport_of_the_2020DietaryGuidelinesAdvisoryCommittee_first-print.pdf

Unfortunately, there is currently no limit for added sugar in school meals.

The USDA's current proposal is to reduce added sugars in school meals to less than 10% of calories per meal by 2027. This proposal does not go far enough, and its rollout is too slow. With diet-related diseases already destroying the health of our children, the time to act is now.

Again, we respectfully urge the USDA to reduce added sugars to less than 6% of calories per meal by Fall 2023, as supported by the Scientific Report of the 2020 DGAC, in which the Committee recommended that Americans reduce their daily added sugar intake to less than 6% of total energy.

Sincerely,

John Bates

John Bates
Executive Director
The Nutrition Coalition