

Understanding the Proposed FDA Healthy Definition: Implications for Dietetic Practice

February 1, 2023

About Oldways

- **Our Vision**
A healthier, happier life through cultural food traditions.
- **Our Mission**
We inspire people to embrace the healthy, sustainable joys of the old ways of eating.
- **Best Known for**
Creating the Mediterranean Diet Pyramid and other Heritage Diet Pyramids, Creating the Whole Grain Stamp, Culinary Travel




Housekeeping

- Attendees will receive an email within ONE WEEK with **CPEU certificate, slides, and recording**
- Visit **oldwayspt.org/CPEU** to register for upcoming webinars or view recordings of previous webinars
- Please submit any questions via the Q&A function in Zoom
- Thank you to KIND Snacks for sponsoring this session!
- Join us on Tuesday, February 21 for a webinar with a research update on African Heritage Diets.

Webinar

**Research Update
on African
Heritage Diets**

Black History Month
Celebration 2023



February 21
2:00 PM E.T.

OLDWAYS

Today's Speakers



Kelly LeBlanc, MLA, RD, LDN
Director of Nutrition
Oldways



Kristin Herron Rubin, PhD
Global Head of Nutrition
KIND Snacks



Background: FDA Healthy Definition

KIND's Nutrition North Star



Our KIND nutrition foundation is based on the principle that a healthy diet starts with **nuts, whole grains, fruits, vegetables and legumes.**

Our promise is to make these **recommended foods the first and main ingredients** in our recipes.

Giving consumers a **convenient, nutritious and tasty way** to add these food groups to their **balanced diet.**

KIND's Journey with FDA "Healthy"



Claim Conditions for Use - established in 1994

Table 2	Individual Food / RACC	Meal & Main Dish Product /Serving
Total Fat	≤ 3 g per RACC	≤ 3 g/100g & < 30% total calories
Sat Fat	≤ 1g	≤ 1g/100g & < 10% total calories
Sodium	≤ 480 mg	≤ 600 mg
Cholesterol	≤ 60 mg	≤ 90 mg
Beneficial Nutrients	≥ 10% DV of one nutrient: Vitamins A & C, Calcium, Iron, Protein, Fiber	

Can exceed total fat, provided USAT fats are declared AND >50% of the total fat amount

Potassium and Vitamin D are accepted as beneficial nutrients

RACC: Reference Amount Customarily Consumed per eating occasion

Source: US HHS, FDA CFSAN 2013. A Food Labeling Guide. Guidance for Industry. <https://www.fda.gov/media/81606/download>



The Need to Update “Healthy”

- Labels **help people select foods** that can fit into a healthier diet
- Shifts in US Dietary Guidelines prompted the proposed revision:
 - Isolated nutrients → Food group requirements
 - Restricting total fat → Focus on type of fat
 - Daily Value for **added sugars**
- Criteria for use should be **consistent with current nutrition science and federal dietary guidance** with the objective to:
 - *Improve dietary patterns*
 - *Reduce chronic disease*
 - *Advance health equity*
 - *Empower consumers with more information*



Proposed Updates to FDA Healthy Definition

Overview of Proposed Healthy Definition

To use the 'healthy' nutrient content claim a product must meet the following:

Provide a food group

- ✓ Grains
- ✓ Dairy
- ✓ Vegetable
- ✓ Fruit
- ✓ Proteins
- ✓ Oils

- Focus on meeting nutrient needs with nutrient dense recommended foods

Contain a certain amount of food group

- ✓ Based on Dietary Guideline Recommendations

- 2020-2025 Healthy Diet Pattern daily amounts for 2000 kcal level divided into 4 eating occasions

Overview of Proposed Healthy Definition

To use the 'healthy' nutrient content claim a product must meet the following:

Eligible Product Types

- ✓ Individual product
- ✓ Mixed product
- ✓ Main dish
- ✓ Meal

- Each product type has specific food group requirements based on Reference Amount Customarily Consumed (basis for serving size)

Nutrients to limit baseline thresholds

- ✓ 5% DV (1g) Saturated fat
- ✓ 5% DV (2.5g) Added sugar
- ✓ 10% DV (230mg) Sodium

- Values are then adjusted based on food group and product type

Overview of Proposed Healthy Definition

Baseline nutrients to limit threshold adjustments for food groups

Food Groups	Food Group Equivalent Minimum	Added Sugar Limit	Sodium Limit	Saturated Fat Limit
Grains	3/4 oz whole-grain equivalent	5% DV (2.5 g)	10% DV (230 mg)	5% DV (1 g)
Dairy	3/4 cup equivalent	5% DV (2.5 g)	10% DV (230 mg)	10% DV (2 g)
Vegetable	1/2 cup equivalent	0% DV (0 g)	10% DV (230 mg)	5% DV (1 g)
Fruit product	1/2 cup equivalent	0% DV (0 g)	10% DV (230 mg)	5% DV (1 g)
Proteins	Food Group Equivalent Minimum	Added Sugar Limit	Sodium Limit	Saturated Fat Limit
Game meat	1 1/2 oz equivalent	0% DV	10% DV	10% DV
Seafood	1 oz equivalent	0% DV	10% DV	10% DV
Egg	1 egg	0% DV	10% DV	10% DV
Beans, peas, and soy products	1 oz equivalent	0% DV	10% DV	5% DV
Nuts and seeds	1 oz equivalent	0% DV	10% DV	5% DV*

* Excluding saturated fat derived from nuts and seeds

BASELINE THRESHOLDS

- ✓ 5% DV (1g) Saturated fat
- ✓ 5% DV (2.5g) Added sugar
- ✓ 10% DV (230mg) Sodium

Oils	Food Group Equivalent Minimum	Added Sugar Limit	Sodium Limit	Saturated Fat Limit
100% Oil	N/A	0% DV	0% DV	20% of total fat
Oil-based Spreads	N/A	0% DV	5% DV	20% of total fat
Oil-based Dressing*	N/A	2% DV	5% DV	20% of total fat

* Must contain at least 30% oil and saturated fat level of the oil must be ≤ 20 percent of total fat

Overview of Proposed Healthy Definition

Further adjustments to baseline nutrients to limit are applied by product type

Food Groups	Added Sugar Limit	Sodium Limit	Saturated Fat Limit
Grains	5% DV (2.5 g)	10% DV (230 mg)	5% DV (1 g)
Dairy	5% DV (2.5 g)	10% DV (230 mg)	10% DV (2 g)
Vegetable	0% DV (0 g)	10% DV (230 mg)	5% DV (1 g)
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Proteins	Added Sugar Limit	Sodium Limit	Saturated Fat Limit
Game meat	0% DV	10% DV	10% DV
Seafood	0% DV	10% DV	10% DV
Egg	0% DV	10% DV	10% DV
Beans, peas, and soy products	0% DV	10% DV	5% DV
Nuts and seeds	0% DV	10% DV	5% DV*

Sample Foods	Individual food	Mixed product	Meal
			
Amount of food groups required	6-oz yogurt (1 food group equivalent)*	1/8 cup dried fruit and 1/4 oz nuts (At least 1/2 food group equivalent each from 2 different food groups)	1 oz salmon, 1/2 cup green beans, 3/4 oz brown rice (At least 1 food group equivalent each from 3 different food groups)
Nutrients to Limit (no more than)**	2 g saturated fat 230 mg sodium 2.5 g added sugar	1 g saturated fat*** 230 mg sodium 0 g added sugar	4 g saturated fat 690 mg sodium 2.5 g added sugar
<p>* A food group equivalent is the amount of a food group required</p> <p>** Amounts based on percentage of the Daily Value for that nutrient</p> <p>*** Saturated fat from nuts/seeds does not contribute to limit</p>			



Complexity of Defining Healthy

Areas of Complexity

FDA is seeking comment on proposal areas including:

1

Meeting nutrient needs with food groups

Should nutrients to encourage be included in addition to the food group criteria?

2

Nutrients to limit baseline thresholds

Is it appropriate to have different baseline values for nutrients to limit?

3

Adjustments of nutrients to limit for food groups

Are adjustments to added sugars and saturated fat appropriate?

4

Consumer access to information

Can this information be represented with a symbol on front-of-pack?

Complexity of Defining “Healthy”



- One single food/meal does not make or break an overall healthy diet
- Nutrition is determined by the combination of our meals over time (Pyramid model)
- Nutrition needs are personal
- Many of the healthiest foods don't carry a nutrition label at all
- Failure to regulate food marketing → “Wild West” shopping experience

From Vegan to Paleo, Do Experts Agree On What “Healthy” Means?



Photo courtesy of Oldways

Yes! Experts Agree On Key Elements of “Healthy”

1. More plants, nuts, legumes, and seafood
2. Sustainability is essential
3. A transparent process, beyond politics
4. Good x 3
5. Common ground over confusion
6. Solid evidence, of all kinds
7. Avoid sensationalism
8. Compared to what?
9. From rules to practical tools
10. Food literacy
11. Food systems

<https://oldwayspt.org/oldways-common-ground-consensus>

RDNs Needed to Translate “Healthy” into Meaningful Action

- How will patients and clients interpret “healthy” in real life?
- What legislative guardrails are needed to make food marketing more straightforward for consumers?
- How can we support people on their journey to better nutrition?
- Dietitians are the key!



Laura Mitulla for Unsplash

Next Steps

Comment Period Extended to 2/16/2023

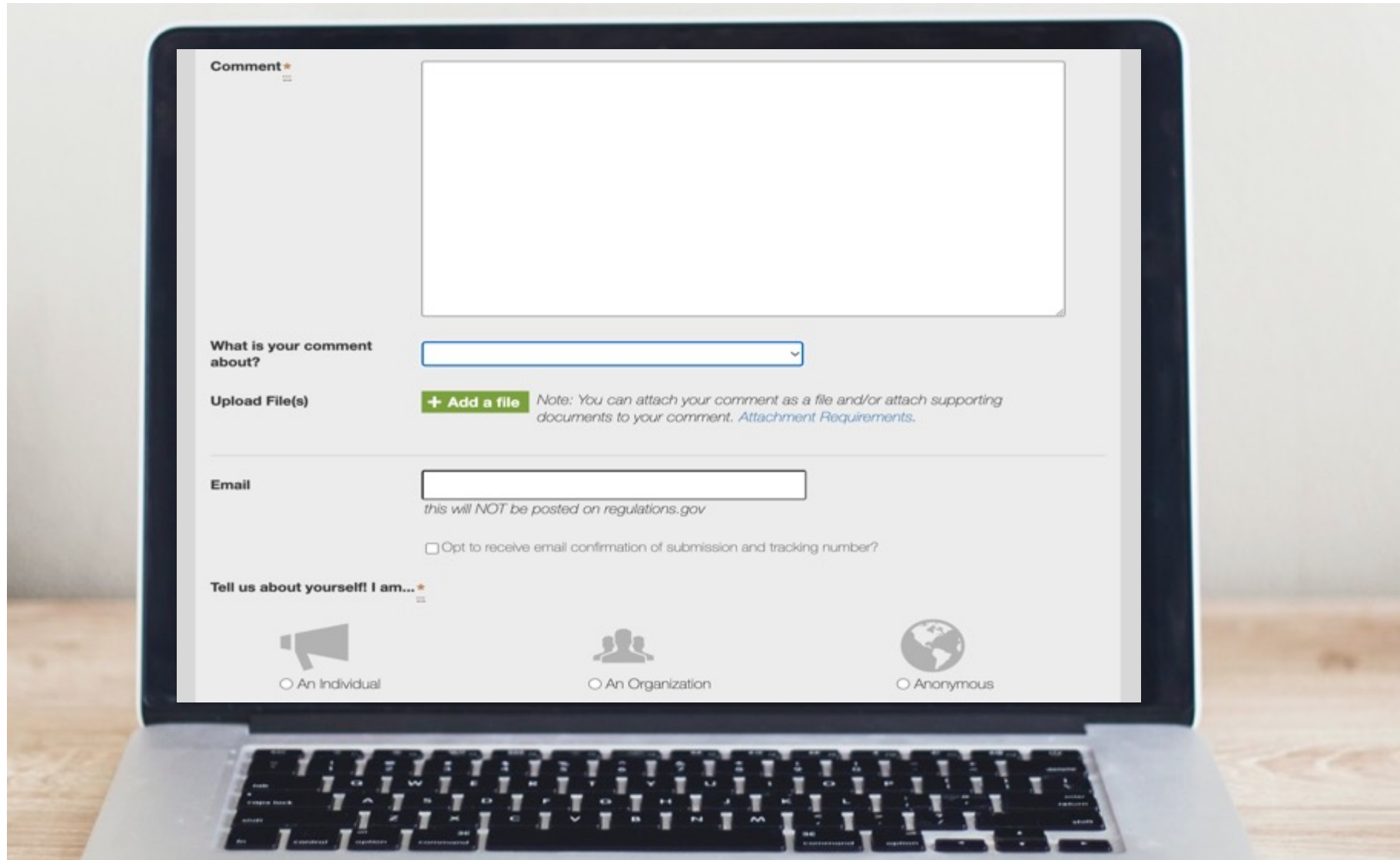
Visit <https://www.federalregister.gov/documents/2022/09/29/2022-20975/food-labeling-nutrient-content-claims-definition-of-term-healthy>



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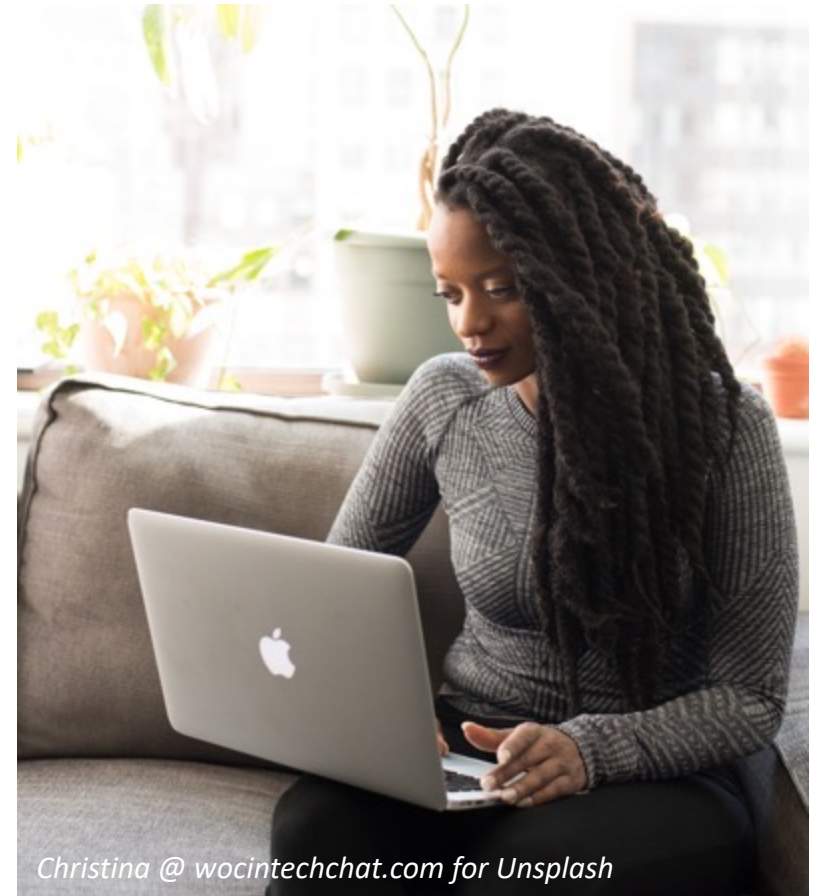
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In Summary

- FDA labeling regulations have real-world impacts in the retail nutrition environment.
- There is not one single way to approach these questions.
- Pattern of foods over time makes a bigger difference on health than one single “healthy” food.
- **Regardless of where or how we practice, dietitians need to make our voices heard and have a seat at the table in these discussions.**



Christina @ wocintechchat.com for Unsplash

Thank you!

Questions?