



1101 30th Street NW, Suite 200
Washington, DC 20007
(202) 534-1440 | www.CandyUSA.com

November 28, 2017

The National Confectioners Association is the trade association that advances, protects and promotes chocolate, candy, gum and mints, and the companies that make these special treats. We educate the public to help ensure that it understands and appreciates the unique role that chocolate and candy can play in a happy, balanced lifestyle.

America's leading chocolate and candy companies recently announced a major initiative with the Partnership for a Healthier America to provide consumers with more information, options, and support as they seek to manage their sugar intake and gain a better understanding of the ingredients in their favorite treats. By 2022, half of our individually wrapped products will be 200 calories or less per pack and 90 percent of our best-selling treats will have calorie information on the front of the pack. As a result of this voluntary commitment to PHA, consumers will soon see more options in smaller pack sizes – and innovative new products – as we continue our journey to help them and their families make informed choices.

We appreciate the opportunity to participate in this listening session today. We agree with many of the conclusions in the National Academy of Sciences reports and applaud the U.S. Department of Agriculture for considering the implementation of NAS's recommendations.

- First, it is essential that the dietary guidelines be rooted in the strongest scientific standards since these guidelines form the foundation for all federal nutrition policy. Specifically, the process would benefit from developing a standardized evidence review process based on validated methods.
- Additionally, as noted in the NAS reports as one of five identified values to improve the integrity of the guidelines, we would appreciate greater transparency throughout the process.
- Furthermore, it would be beneficial for the committee to be comprised of experts from a broad array of disciplines to ensure that the committee is balanced and represents diverse perspectives. For instance, we would support including oral health professionals on the 2020 guideline committee in order to review the evidence on the role of sugar-free gum in addressing dental issues.

Throughout this process, we support the efforts by USDA and the U.S. Department of Health and Human Services to offer consumers realistic nutritional guidance on their favorite treats like chocolate, candy, gum and mints. Nearly all Americans enjoy chocolate and candy throughout the year, but on average consumption of these treats is moderate. Most people in the U.S. enjoy chocolate and candy about two to three times per week, averaging just 40 calories per day and about one teaspoon of added sugar per day from confectionery items. Chocolate and candy are beloved treats that often play a role in holiday celebrations and family traditions. Given this cultural association and recognizing that the body of evidence supports education more than restriction, it is practical to acknowledge the role that treats can play in a happy, balanced lifestyle in the Dietary Guidelines.



1101 30th Street NW, Suite 200
Washington, DC 20007
(202) 534-1440 | www.CandyUSA.com

Sincerely,

A handwritten signature in cursive script that reads 'Laura Shumow'.

Laura Shumow

Vice President of Scientific and Regulatory Affairs

National Confectioners Association