



AMERICAN SPICE TRADE ASSOCIATION, INC.

1101 17th Street, N.W. • Suite 700  
Washington, DC 20036 USA  
Tel: 202-331-2460 • Fax: 202-463-8998  
E-mail: [info@astaspice.org](mailto:info@astaspice.org)  
Web: [www.astaspice.org](http://www.astaspice.org)

October 31, 2014

Richard D. Olson, M.D., M.P.H.  
Prevention Science Lead and Designated Federal Officer, 2015 DGAC  
Office of Disease Prevention and Health Promotion/OASH  
U.S. Department of Health and Human Services  
1101 Wooton Parkway, Suite LL100 Tower Building  
Rockville, MD 20852

Angie Tagtow, M.S., R.D.  
Executive Director, Nutrition Guidance and Analysis Division  
Center for Nutrition Policy and Promotion  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

Re: 2015 Dietary Guidelines for Americans

Dear Dr. Olson and Ms. Tagtow:

The American Spice Trade Association (ASTA) appreciates the opportunity to submit comments regarding the 2015 Dietary Guidelines for Americans currently under development by the Dietary Guidelines Advisory Committee (DGAC). ASTA appreciates the work that is being done to ensure guidelines for a healthy diet for Americans and believes that spices can play an important role in encouraging healthy eating patterns.

## **Introduction**

### American Spice Trade Association

The American Spice Trade Association (ASTA) was established in 1907 to provide representation for the American spice trade. Its members include companies involved in all aspects of the spice trade – importing, growing, processing, and marketing at the wholesale and retail levels. On behalf of its members, ASTA works with federal and state regulators and legislators and assists its members in addressing a variety of technical issues to help members provide an adequate supply of safe and wholesome spices for their industrial, food service and consumer customers.

## ASTA supports development of the Dietary Guidelines for Americans

ASTA supports the work of the DGAC to develop policy recommendations that will be used to form the basis of Federal nutrition policy, education, outreach, and food assistance programs. The U.S. government plays a critical role in steering consumers to healthful eating habits through nutrition assistance policy and education of critical knowledge on healthy eating behaviors.

The DGAC is tasked with developing recommendations based on the preponderance of current scientific and medical knowledge. That includes examining the existing Dietary Guidelines for Americans (DGA 2010), taking into consideration new scientific evidence and current resource documents to develop a report to the Secretaries of HHS and USDA that will serve as the basis for developing the Dietary Guidelines for Americans 2015.

## **The Role of Spices**

In our previously submitted comments, ASTA underscored the role spices can have in improving healthful eating choices and requests that the overarching concepts already identified in the DGA 2010 be further expanded.

### Dietary Guidelines for Americans previously identified spices as a potential tool for improving eating choices and sodium reduction

One of the overarching concepts identified in the DGA 2010 was to focus on nutrient-dense foods and beverages. Specifically:

- Increase intake of foods that are consumed below recommended amounts. For most people, this means choosing more vegetables, fruits, whole grains, fat-free or low-fat milk and milk products, seafood and oils.
- Reduce intake of foods and food components consumed in excess amounts. For most people, this means consuming fewer foods and beverages high in solid fats (sources of saturated and trans fatty acids), added sugars, and sodium (i.e., consume these foods and beverages less often and in small amounts).

### Spices should be recognized in DGA 2015 as strategy to enhance flavor of nutrient dense foods

As already acknowledged in the DGA 2010 there is a greater need for nutrient dense foods in the American diet. This was recognized by at least two of the Working Groups of the current DGAC. ASTA urges the recognition of the important role spices can have in promoting behaviors to increase the consumption of nutrient dense foods. We recommend that this concept be expanded to provide greater awareness to all Americans on the benefits spices can play in enhancing the palatability of nutrient dense foods.

Utilization of spices can increase consumption of foods such as fruits, vegetables and healthy grains by making them more appealing and taste better. As noted in our previous correspondence, empirically, food preparation methods including spices tend to enhance the taste

of vegetables, as for example in the Mediterranean style vegetable cooking compared to simply steamed vegetables. (Mayo Clinic 2011)

Limited research has also shown that the use of spices increases the flavor experience of foods that are considered relatively bland, such as vegetables, potatoes, and grains (Cox et al. 1998; Tapsell et al. 2006; Ghirardini et al. 2007). Ideally flavorings do not compromise the nutritional value of the foods by adding calories, fat, or salt. It was recently reported that addition of flavor assists in consumption of vegetables in children (Savage et al. 2013). *The Journal of the Academy of Nutrition and Dietetics* article in May 2013 entitled “the Addition of a Plain or Herb-Flavored Reduced-Fat Dip is Associated with Improved Preschoolers’ Intake of Vegetables” states, “These findings suggest that offering vegetables with reduced-fat dips containing familiar herb and spice flavors can increase tasting and thereby promote liking, acceptance, and consumption of vegetables, including vegetables previously rejected or disliked.” While the flavored vegetable dips used in this study assisted in improving consumption of vegetables by children, their contribution to the dietary profile may not be consistent with the healthy dietary guidelines promoted by health organizations. Instead, spices and herbs alone may impart a similar benefit without the added disadvantage associated with more complex flavoring products.

### Spices are an important resource to assist with reduction of sodium intake

Spices were mentioned in Appendix 2 of the DGA 2010 as a potential strategy to influence consumer behavior to reduce sodium intake:

- Use little or no salt when cooking or eating. Trade in your salt shaker for the pepper shaker. Spices, herbs, and lemon juice can be used as alternatives to salt to season foods with a variety of flavors.

Subcommittee 1: Food and Nutrient Intakes and Health: Current Status and Trends has issued a draft conclusion statement noting that sodium and saturated fat are over-consumed relative to the UL or other maximum standard.

ASTA urges the DGAC 2015 to recognize the important role spices can have on assisting with sodium reduction to support the draft conclusion of Subcommittee 1 that sodium is over consumed. There is evidence that the use of spices may assist in the reduction of sodium intake by making food such as fruits and vegetables more appealing.

In a relatively recent review of the benefits of spices as part of a healthy diet, it was recommended that the role of spices as part of a healthy diet should be made more explicit along with recommendations of how to achieve that since “herbs and spices can be used in recipes to partially or wholly replace less desirable ingredients such as salt, sugar and added saturated fat in, for example, marinades and dressings, stir-fry dishes, casseroles, soups, curries and Mediterranean-style cooking. Vegetable dishes and vegetarian options may be more appetizing when prepared with herbs and spices.” (Tapsell et al. 2006)

Summary

ASTA and its members appreciate the opportunity to comment on the Dietary Guidelines for Americans 2015 recommendations that are close to being finalized. We respectfully request your consideration of these important points and would be happy to answer any questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Deem', with a stylized, cursive script.

Cheryl Deem  
Executive Director

## References:

Cox DN, Anderson AS, Lean ME, Mela DJ. 1998. UK consumer attitudes, beliefs and barriers to increasing fruit and vegetable consumption. *Public Health Nutr.* 1(1):61-8.

Ghirardini MP, Carli M, del Vecchio N, Rovati A, Cova O, Valigi F, Agnetti G, Macconi M, Adamo D, Traina M, Laudini F, Marcheselli I, Caruso N, Gedda T, Donati F, Marzadro A, Russi P, Spaggiari C, Bianco M, Binda R, Barattieri E, Tognacci A, Girardo M, Vaschetti L, Caprino P, Sesti E, Andreozzi G, Coletto E, Belzer G, Pieroni A. 2007. The importance of a taste. A comparative study on wild food plant consumption in twenty-one local communities in Italy. *J Ethnobiol Ethnomed.* 3:22.

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Savage, J.S., Peterson, J., Marini, M., Bordi, P.L. and Birch, L.L. 2013. The Addition of a Plain or Herb-Flavored Reduced-Fat Dip is Associated with Improved Preschoolers' Intake of Vegetables. *The Journal of the Academy of Nutrition and Dietetics.* 113(8):1090-5. Available online at <http://www.ncbi.nlm.nih.gov/pubmed/?term=herb+vegetables+Savage+2013>

Tapsell LC, Hemphill I, Cobiac L, Patch CS, Sullivan DR, Fenech M, Roodenrys S, Keogh JB, Clifton PM, Williams PG, Fazio VA, Inge KE. 2006. Health benefits of herbs and spices: the past, the present, the future. *Med J Aust.* 185(4 Suppl):S4-24.