

March 3, 2014



Dear Dietary Guidelines Committee:

The National Restaurant Association (the "Association") appreciates the opportunity to provide comments to the committee regarding progress the industry has made regarding health and wellness. Founded in 1919, the Association is the leading business association for the restaurant industry, which comprises 960,000 restaurant and foodservice outlets. The Association represents more than 435,000 member restaurant establishments and is the leading business association for the restaurant industry, including tableservice, quickservice, chains, franchisees, independents, institutional foodservice providers and allied members. Food and healthy living are priorities for our every-growing industry, which employs approximately 13.1 million people.

One of the National Restaurant Association's core areas of interest is in food and healthy living. To continue to meet industry's changing needs, the National Restaurant Association has created a healthy living platform that will provide a strong foundation that not only helps contribute to a healthier America but helps foster a healthy and thriving restaurant industry. The vision is to create an environment that encourages voluntary, flexible options for restaurateurs to address today's healthy living challenges — and to create a holistic approach which encompasses a multitude of solutions.

Restaurants have employed and continue to voluntarily employ a wide range of strategies to play a positive role in reversing the trend of obesity, including adding more healthful items to menus and disclosing nutrition information so that consumers may choose foods that meet their preferences and diet. Through these efforts, the restaurant industry has seen consumer demand for healthful and nutritional items increase, both among children and adults.

The restaurant industry is highly diverse, including restaurants that provide a wide range of dining options to meet the needs of consumers whether they dine out frequently or only on special occasions. Whether formally pledging participation, or otherwise devoting valuable resources and time, our industry's commitment is centered on action.

We appreciate the committee requesting information from the food and restaurant industry regarding progress that has been made over the past few years. With this we would like to highlight several programs and initiatives, current trends and related research, as well as specific examples of our members' commitment to providing healthier options.

### Trends and Research

On an annual basis we conduct our "What's Hot survey", which asks more than 1,800 professional chefs to predict top menu trends for the coming year.<sup>1</sup> What's Hot in 2014 showed that nutrition related trends are some of the hottest menu trends for this coming year. Number 4 out of over 220 trends identified were healthful kids' meals and also in the top 10 coming in at number 7 was children's nutrition as a culinary theme. Other nutrition related trends in the top 10 included gluten-free cuisine, as well as locally sourced meat, seafood and produce, which consumers believe to be healthier or better for the environment. Also, in a recent survey conducted by the Association, more than 7 in 10 adults said they were trying to eat more healthful now at restaurants than they did in the past.<sup>2</sup> According to the Association's research, more than 7 out of 10 consumers say they are more likely to visit a restaurant that offers healthful options, and more than 8 out of 10 agree that restaurants offer more healthful choices now compared to two years ago. We believe this will also help drive healthier choices for children particularly when parents dine out together. A strong majority of restaurant operators across all segments of the industry say their customers are paying more attention to nutrition, spurring them to increase and diversify such options on the menus. Overall, more than 6 in 10 say they have items identified as healthful/nutritious on their menus and about 75% offer similar options on their children's menus. In addition, 6 in 10 chefs in the Association's What's Hot in 2014 survey say they always make efforts to adjust recipes to be

more healthful, and 33% say they attempt to make dishes more healthful, but that not all recipes are easily adjusted.

Also of note, a recently published scientific study quantitatively evaluated whether fast food restaurant chains have improved the nutritional quality of their U.S. menu offerings over a period of time. The researchers found that the Healthy Eating Index-2005 score for 2009/2010 was 48, which had improved from 45 in 1997/1998.<sup>3</sup> The greatest improvements in nutritional quality were seen in the increase of meat/beans, decrease in saturated fat, and decrease in the proportion of calories from solid fat and added sugars. We realize the impact of even small changes can be substantial when considering population health.

Even though our own trends analysis shows that consumers say they want more nutritionally balanced meals - they don't always purchase what they say they want. In the early stages of lessons from menu labeling and other attempts to provide health related symbols linked to healthier plates, there is some evidence showing that labeling food as healthy in restaurants has often backfired. In some instances, restaurants have experienced a drop off in sales of particular items once they are identified as being "healthier." However, we have seen movement in this area with restaurants successfully offering restricted caloric meals, such as less than 700 calories and consumers continuing to order to these options. However, we believe education needs to continue on nutrition and a balanced diet in order for consumers to better understand their caloric needs.

### Kids LiveWell

One example of the industry's commitment to health and wellness is the Association's Kids LiveWell. Our Kids LiveWell program has truly been a groundbreaking initiative for the National Restaurant Association and the restaurant industry. In just over two years, Kids LiveWell grew from 19 brands and 15,000 locations to over 150 national, regional and local, independent restaurant brands representing over 42,000 locations. The voluntary program, which provides parents with a growing selection of healthful children's menu choices located in every state. We even have amusement parks and museums participating. Many of these restaurant brands you

will recognize including Dennys, IHOP, Silver Diner, Burger King, Friendly's, Chili's, Dairy Queen, Outback, Applebee's, Boston Market, Chick-fil-A, Qdoba, and Arby's, just to name a few. For a full list of participating restaurants please visit [www.healthydiningfinder.com](http://www.healthydiningfinder.com).

To join Kids LiveWell, restaurants agree to offer and promote a selection of qualifying menu items including a full meal (entrée, side and beverage) along with an additional side that meet defined nutrition criteria based on leading health organizations' scientific recommendations, including the 2010 USDA Dietary Guidelines. The initiative focuses on increasing consumption of fruits and vegetables, lean protein, whole grains and low-fat dairy, and limiting total calories, total fats including unhealthy fats, total sugar and sodium. Below are the nutrition criteria for the full meals and additional side items. All Kids LiveWell approved meals must meet the criteria in order for the restaurants to participate in the program.

**Kids LiveWell Nutrition Criteria for Full Kids' Meals (entrée, side option and beverage):**

- 600 calories or less
- ≤ 35% of calories from total fat
- ≤ 10% of calories from saturated fat
- < 0.5 grams trans fat (artificial trans fat only)
- ≤ 35% of calories from total sugars (added and naturally occurring)
- ≤ 770 mg of sodium
- 2 or more food groups (see below)

**Kids LiveWell Nutrition Criteria for Side Items:**

- 200 calories or less
- ≤ 35% of calories from total fat
- ≤ 10% of calories from saturated fat
- < 0.5 grams trans fat (artificial trans fat only)
- ≤ 35% of calories from total sugars (added and naturally occurring)

- ≤ 250 mg of sodium
- 1 food group (see below)

**Full meals must include two sources & sides must include one source of the following:**

- **Fruit:** > ½ cup (includes 100% juice)
- **Vegetable:** > ½ cup
- **Whole grains:** contains whole grains
- **Lean protein** (skinless white meat poultry, fish/seafood, beef, pork, tofu, beans, egg): > 2 ounces meat, 1 egg or egg equivalent, 1 oz. nuts/seeds/dry bean/peas (lean as defined by USDA)
- **Lower-fat dairy** (1% or skim milk and dairy): > ½ cup (while not considered low-fat, 2% milk is allowed if included in the meal and the meal still fits the full meal criteria)

With this program we have provided over 350 meals which meet the nutrition criteria and have provided 211 servings of fruit, 198 servings of vegetables, 70 servings of low-fat dairy, 147 servings of lean protein and 51 servings of whole grains to children's menus across the country. We have collaborated with Healthy Dining as our 3<sup>rd</sup> party validator. Their team of registered dietitians works with restaurants to identify and validate menu choices that meet the program's criteria. Participating restaurants and their qualifying items that include their full nutrition profile can be found on [HealthyDiningFinder.com](http://HealthyDiningFinder.com), and also via a free [Kids LiveWell App](#). In addition, the Association held the inaugural Kids Recipe Challenge in the spring of 2013 with the recent announcement to hold a 2<sup>nd</sup> Challenge in 2014. Created with founding partner McCormick For Chefs, the Kids Recipe Challenge recognizes delicious, healthful items that meet Kids LiveWell nutrition criteria from children's menus at restaurants and foodservice establishments nationwide. Four winners were recognized at the annual National Restaurant Association Restaurant, Hotel-Motel Show in Chicago this past May. This is a wonderful initiative that has sparked innovative recipes and further development of the Kids LiveWell program.

Building on Kids LiveWell positive momentum, we have also expanded the program by recruiting foodservice suppliers that provide ingredients and menu items to restaurants, including Kraft Foods, Kellogg's and PepsiCo, which offer qualifying products that help create healthful Kids LiveWell meals. In 2013, the Association announced that national foodservice distributor Sysco would begin offering more than 25 Kids LiveWell approved meals to restaurants across the country particularly targeting independent restaurants to join the program. Sysco is the Association's endorsed distribution partner and offers the only proprietary turnkey program for operators supporting the Kids LiveWell initiative. Again this will help to grow the program as we engage suppliers and distributors to become a partner of the program.

Social media has become an important platform to promote what restaurants are doing to enhance healthful offerings for kids. The Association and Kids LiveWell restaurants connect with plugged-in parents through Facebook, Twitter and other social networks. As Kids LiveWell marked its second anniversary, participating restaurants shared their stories with 5,000 attendees at BlogHer, a conference for women in social media. In turn, attendees spread the word through blog posts, Twitter and Facebook. In the two weeks after BlogHer, downloads of the Kids LiveWell smartphone app increased to 3,280. Since launching Kids LiveWell, the Association has hosted several Twitter parties to drive buzz about the program. The most recent event, which featured a Q&A with the Association's registered dietitian reached more than 1.1 million people. Many shared positive stories about choosing healthful kids' items when dining out. Overall, the event generated nearly 10 million impressions.

### Working with National Leaders

The National Restaurant Association and the restaurant industry are engaged in helping educate consumers about nutrition — and eager to do more. We are working very hard to develop ways to work together with everyone who has a stake in building a healthier population — from consumers to government agencies.

One of the Association's longest-standing and most critical partnerships is with Healthy Dining, a California-based organization that offers nutrition-analysis services to the foodservice industry as well as consumer resources. Developed with partial funding from the Centers for Disease Control and Prevention (CDC), HealthyDiningFinder.com is a free resource for the dining public that provides Americans with guidance in choosing menu items that emphasize lean protein, fruits and vegetables, whole grains and unsaturated fats, as well as meeting calorie, saturated fat and sodium limits. More than 350 restaurant companies representing 60,000 locations coast to coast, fast food to fine dining, participate in the Healthy Dining Program. More than 4,000 qualifying menu choices with corresponding nutrition information are featured on HealthyDiningFinder.com, with close to 1,000 menu choices also meeting the "Sodium Savvy" designation (750 mg of sodium or less for entrées). The Healthy Dining Program is especially helpful to small restaurant companies that do not have the financial resources to have full nutrition information available and/or a registered dietitian on staff. Healthy Dining provides the nutrition expertise and helps the small restaurant to offer a selection of Healthy Dining choices and nutrition information. Healthy Dining, together with consultants from Yale and Cornell, has received funding from the National Institutes of Health to conduct research designed to test consumer acceptance of simple modifications to standard restaurant recipes. The modifications entail reductions in the amounts of high-calorie/high-sodium ingredients, such as cheese, butter, mayonnaise, dressings, sauces, oil and/or salt. The key component of this research is to find optimal level of the reductions that will be acceptable to restaurant guests. The research is approximately 50% completed and thus far has found very promising results in that a 10 to 25% reduction of butter, cheese, oil and salt has tested to remain appealing and acceptable to consumers. The National Restaurant Association will work with Healthy Dining to disseminate these results to the restaurant industry once the research is completed. When widely adopted in the restaurant industry, the reductions of these targeted ingredients will result in a positive impact on public health.

The Association is a participating member of the Dietary Guidelines Alliance (DGA) which is a partnership among leading health organizations, the government and food industry organizations, dedicated to providing consumers with concrete, practical advice on how to

apply the Dietary Guidelines to their lives. The mission of the Alliance is to provide positive, simple and consistent messages to help consumers achieve healthy, active lifestyles. The Alliance's strength has been in both its commitment to a consumer-focused research program and its network of partners for carrying the mission. In 2010, the Alliance reconvened and determined that consumer research was needed to help Americans achieve a healthy and active lifestyle. Research will build upon prior findings to gauge Americans' current knowledge around energy balance in order to develop concept communications that inspire action.

The Alliance identified the following priorities for consumer message development and evaluation, focusing primarily on parents with children 18 years and younger:

- Achieving energy balance (contribution of calories in and out, including physical activity);
- Meeting nutrient recommendations/making nutrient-rich choices within the context of personal calorie needs;
- Enjoying indulgent foods within the context of personal calorie needs; and
- Recognizing the impact of portion size.

The Alliance finalized a multi-phase research plan including ethnographies, focus groups, and a quantitative Web survey. The research was completed and published as two peer reviewed scientific publications, which we would like submitted to the Nutrition Evidence Library consideration for the Dietary Guidelines Committee review. The objectives of Phases I and II of the research were to identify current behavioral practices and beliefs in an effort to develop and test behavior-directed messages to help families achieve healthful, active lifestyles, consistent with the DGA. A secondary purpose was to determine parents' intent to implement related guidance behaviors. Perceived barriers to and motivators for success were also identified.<sup>4</sup> Key findings from Phase I and II includes the following:

- Parents reported they did not, nor were they willing to, count calories for themselves and family members. Messages emphasizing "more nutrient value for your calories"

were not readily understood because participants did not comprehend calories in general.

- These studies found that messages that encourage planning ahead and making a healthful active lifestyle a family matter may convince parents to take time to jointly set goals and take action.
- Parents preferred messages that indicate each family or individual is unique and let parents know they are in charge.
- Messages that drew analogies to further explain key concepts, such as budgeting for calories, were considered useful. Focus group results illustrated customary messages that consumers often find appealing - concise, practical, prescriptive, and indicative of a benefit - also appealed to participants in this study.

Finally for phase II of the research, a web-based survey of parents with children aged 2 to 17 years was conducted to develop, refine, and validate dietary guidance messages and determine parents' intent to implement recommendations.<sup>5</sup> Key findings from Phase III includes the following:

- Although participants could name one-example of a nutrient-rich food, usually fruits or vegetables, most reported needing more practical education on additional nutrient-rich foods and beverages and how to increasingly include them in their diets.
- The ranking for overall motivational effect of each nutrient-rich message was significant. "Base your plate on nutrient-rich foods" was ranked as most motivating.
- When asked to choose one preferred source of information for each core concept, parents' top rated sources for messaging were grocery stores, health professionals' offices, and restaurants. Restaurants were rated highly for information about portion size and higher-calorie items.
- The web based survey results indicate behavior-directed messaging may motivate parents to action. Recognizing that parents value family involvement and individualized solutions, messages that are clear, simple and action-specific, such as "Be a Role Model for Your Children" and "Know Your Number," can be integrated into multiple sectors of society to motivate behavior change.

This research has been used by the Association and our members to effectively educate consumers on how to manage their diets according to the most recent 2010 Dietary Guidelines. In addition, DGA has released an updated digital edition of the *It's All About You Communicators Tool Kit*, a teaching tool to help nutrition communicators convey positive, simple and consistent nutrition and health messages to consumers based on the findings of the published research.<sup>6</sup>

Another long-standing partnership is with the Produce Marketing Association (PMA). In 2009, the Association worked with PMA on a project to increase fresh produce restaurant and foodservice meals. The Association research examined opportunities for and barriers to greater produce use. Thanks to the project, more restaurants are working with their produce suppliers to ensure consistent supply, flavor and quality.

The Association has also been working with the Partnership for a Healthier America. The group engages private-sector businesses to help curb childhood obesity. Through its participation with Partnership for a Healthier America, Darden Restaurants changed children's menus at its Red Lobster, Olive Garden, Bahama Breeze, LongHorn Steakhouse, Season's 52, Capital Grille and Yard House restaurants.

It is important to mention that in addition to internal initiatives, the Association's President and CEO Dawn Sweeney is a charter member of ChildObesity180. The group brings together stakeholders from public, private, non-profit and academic sectors to examine the causes of the childhood obesity epidemic. The group is creating a portfolio of high-impact initiatives to improve children's health including within the foodservice sector.

The Association is also a national strategic partner with the U.S. Department of Agriculture Center for Nutrition Policy and Promotion on spreading the word about MyPlate. In accordance with their communication strategy, we have written and published consumer materials, including blogs and videos to educate the public on healthy eating particularly when dining out.

Through partnerships such as these, the Association will also be able to help restaurateurs with opportunities to serve and educate their guests, and in the process, drive more business and customer loyalty. The restaurant industry is focused on responding to consumer demands and we are passionate about serving our guests and ensuring their happiness. We are working hard and engaging our members to do our part in addressing nutrition.

### Examples of Member Commitment

Many of our members have made specific commitments to providing healthier options on the menu. Various approaches have been taken including making public commitments focused on specific goals, working with Partnership for Healthier America as referenced earlier or taking a “stealth health” approach where it is not publically disclosed that restaurants are making changes/modifications to the menu options. Once again, an environment that encourages voluntary, flexible options for restaurateurs to address today’s healthy living challenges is ideal. Our members have taken various approaches. One example would include McDonald’s recently announced it would no longer list soda on the kids’ meal section of its menu boards. Subway, Chipotle, Arby’s, Red Lobster, Olive Garden, Bahama Breeze, Longhorn Steakhouse and Panera also do not offer soda as a beverage option on their children’s menus. Several members including McDonald’s, Panera, and Starbucks have voluntarily provided calories on the menu prior to the impending release of federal menu labeling regulations.

Several of our members have requested that we highlight their commitment and progress. The following information was supplied to us by these members for inclusion in these comments.

### Burger King® restaurants

- In 2011, Burger King® restaurants introduced lower sodium Chicken Tenders, reducing sodium by 36%.
- Burger King® restaurants dropped caramel dipping sauce from kids’ meals.
- In early 2012, Burger King® restaurants introduced Oatmeal breakfast – which includes 1 serving of fruits, whole grains and dairy

- In 2012, Burger King® restaurants introduced the MorningStar Veggie Burger, made with real vegetables and wholesome grains.
- Burger King Corp. (BKC) is a proud member of the Children’s Food and Beverage Advertising Initiative (CFBAI). We pledge to advertise only those products that meet CFBAI’s strict nutritional criteria in any advertising primarily directed to children under 12.
- Burger King® restaurants are inaugural leaders of the Kids LiveWell program.

### McDonald’s USA

Through partnerships with organizations like the Clinton Foundation and the Alliance for a Healthier Generation, McDonald’s continues journey to help consumers and employees in making informed nutrition choices. McDonald’s has an opportunity to make an impact on nutrition by providing access to recommended food groups through expanded and improved nutritionally-balanced menu choices.

### Between August 1, 2012 and July 31, 2013, McDonald’s USA has served:

- 410 million cups of vegetables to our customers, through choices like the Premium McWrap®, Premium Salads and side salads.
- 200 million cups of fruit from menu offerings like our Fruit n’ Maple Oatmeal, Fruit ‘n Yogurt Parfait, and apple slices.
- 530 million individual packages of apple slices to our youngest customers, with every Happy Meal now including apples in addition to a kids’ size french fry.
- 420 million servings of whole grain, from choices such as Fruit & Maple Oatmeal, and our bakery style bun made with 8 grams of whole grain and a new English muffin made with 8 grams of whole grain.

### Continuing Commitment to Children’s Well-Being:

- In March 2012, we introduced changes to the Happy Meal®, which automatically included apple slices, a kid-size fry plus a fat-free milk option. The updated Happy Meal reduced the average calories in our most popular Happy Meals by 20%.
- Since January 2013, 100% of McDonald's national kids' communications has promoted a nutrition and/or active lifestyle message.
- 100% of our nationally advertised Happy Meals meet the nutrition criteria in the Council for Better Business Bureaus' Food Pledge.

#### Evolving the menu to provide more nutrition minded choices:

McDonald's has taken noticeable steps since announcing their 2011 nutrition commitments to expand and improve our menu to offer customers more wholesome choices:

- The Egg White Delight McMuffin® offers a new taste on the iconic Egg McMuffin and includes a muffin made with 8 grams of whole grain, 100% egg whites and extra lean Canadian bacon. With this introduction, freshly cooked egg whites are available on any breakfast sandwich.
- The Premium McWrap is packed with ingredients like lettuce, tomatoes and cucumbers and is available with or without chicken. The Premium McWrap provided 80 million cups of vegetables since its launch.
- Beginning in early 2014, customers can choose a side salad as an alternative to french fries on the Extra Value Menu.

#### Scaling McDonald's Commitment to Nutrition Globally:

In September 2013, McDonald's Corporation partnered with the Clinton Foundation and the Alliance for a Healthier Generation to announce a global commitment that includes McDonald's top 20 markets. Through this commitment, they will use their size and scale to help educate, empower and encourage customers to make informed, nutrition-minded choices by the year 2020.

This global commitment builds on the nutrition initiatives underway in the McDonald's USA, which include:

- Customers will be able to substitute a side salad, fruit or vegetable\* for French fries in a Value Meal

- \*Salad, fruit or vegetable option will vary per participating market.

The commitment also includes the following related to the promotion and advertising of Happy Meals:

- Provide customers a choice of a **side salad, fruit or vegetable** as a substitute for french fries in value meals. (Salad, fruit or vegetable option will vary per participating market.)
- Promote and market only **water, milk, and juice** as the beverage in Happy Meals on menu boards and in-store and external advertising.
- Utilize Happy Meal and other packaging innovations and designs to **generate excitement** for fruit, vegetable, low/reduced-fat dairy, or water options for kids.
- Dedicate **Happy Meal box or bag panels** to communicate a fun nutrition or children's well-being message.
- Ensure 100 percent of all advertising directed to children to include a **fun nutrition or children's well-being message**.

Recent peer-reviewed published research conducted at the Food and Brand Lab, Cornell University has shown that new Happy Meals purchased had an average of 18.8% (104) fewer calories.<sup>7</sup> Customers did not appear to compensate by choosing higher calorie entrees within the meal. In addition 94% of the calorie decrease was due to the smaller size French fry and more milk was purchased. The study showed that small changes in the automatic or default foods offered or promoted in children's meals can reduce calorie intake and improve the overall nutrition from selected foods as long as there is still an indulgence. Importantly, balancing a meal with smaller portions of favored foods might avoid reactance and overeating.

#### Yum! Brands, Inc.

Yum! Brands, Inc., based in Louisville, Kentucky, has nearly 40,000 restaurants in more than 125 countries and territories with over 18,000 in the US. The Company's restaurant brands – KFC,

Pizza Hut and Taco Bell – are the global leaders of the chicken, pizza and Mexican-style food categories.

Building on their commitment to improving nutrition, Yum! appointed Jonathan Blum as Chief Global Nutrition Officer in early 2012. He reports directly to the Chairman and Chief Executive Officer and is driving strategy for nutritional improvements across all of Yum! Brands. Blum is leading a global team of nutritionists in developing global guidelines and ultimately elevating the nutritional quality of our food.

They have adopted an overarching goal to ensure each of their brands will offer delicious meal options that meet 1/3 of the Recommended Daily Allowance (RDA) established for the country in which they do business (or 1/3 of the World Health Organization RDA if a country has not established RDA's) striving for 15% of meal options by 2015 and 20% by 2020.

They believe they can have the greatest impact in advancing their health and nutrition platform throughout their system and the industry with action-oriented change.

Yum!'s Chief Global Nutrition Officer is working with their brand and divisions to drive nutrition strategy and establish goals for nutritional improvement across all brands. Under his leadership, Yum! has implemented an updated nutrition strategy focused on three pillars:

- more **choice** for consumers
- more **transparency** about product nutrition
- more **nutritional improvement** in our ingredients

Each business market has developed specific nutrition plans and accountabilities which are subject to quarterly review by senior management. Continuous progress in sodium reduction is an area of particular emphasis.

## Choice:

KFC introduced Kentucky Grilled Chicken (KGC) in 2009, which was the most successful product introduction in the brand's history. KGC is a great solution for consumers who love the flavor of KFC, but are looking for products that are lower in calories.

With more than 30 million different topping combinations, Pizza Hut pizza is one of the most customizable products on the planet. For example, ordering a Thin 'N Crispy<sup>®</sup> pizza with half cheese, extra sauce and toppings that are lower in fat (lean meats such as chicken or ham and fruit/vegetables), can mean consumers are enjoying a great tasting pizza with 25 percent less fat than the regular Thin 'N Crispy<sup>®</sup> pizzas. Customization is made simple through the “Create Your Own” ordering feature at PizzaHut.com and throughout all ordering options.

In addition to personalization and customization, Pizza Hut offers an array of toppings including fresh vegetables like green peppers and mushrooms, naturally-preserved Italian Sausage, 100 percent white meat chicken, and 100 percent real beef, pork, and ham. Further, Pizza Hut's Pan, Thin 'N Crispy<sup>®</sup>, Hand-Tossed Style, and Stuffed Crust pizzas contain:

- zero grams artificial trans fat;
- no high fructose corn syrup;
- no MSG;
- and no artificial colors/dyes.

For consumers looking for lower calorie, lower fat options, the Fresco Menu features Taco Bell<sup>®</sup> favorites with freshly prepared pico de gallo—a delicious mix of diced tomatoes, white onions and cilantro—that replaces the cheese and sauce. Packed with flavor and only five calories per serving, pico de gallo reduces fat and calories without sacrificing flavor. For example, a Fresco Grilled Steak Soft Taco contains 150 calories and 4.5 total fat grams versus 200 calories and 10 total fat grams in the traditional product.

### Transparency:

Yum!'s consumers rely on them to provide transparent, truthful information about their menu options to help them make informed choices. Yum! recognizes their responsibility to educate customers and to help them make informed choices. They also recognize that many consumers strive to enjoy an active, balanced lifestyle, and appreciate the importance of combining a sensible diet with daily activity and a little fun

Most of Yum! markets around the world provide nutrition information via brand websites and other customer-facing communications to inform our customers about their choices. Brand websites list ingredients for each permanent menu item. Each brand's website also includes nutritional values of food items, and potential food allergens and sensitivities. Nutrition brochures are available to consumers in restaurants with menu options that fit into a balanced diet.

### Nutritional Improvement:

As Yum! Brands work to make nutritional improvements to their products, they are committed to reducing sodium, eliminating artificial trans fats to zero grams of trans fat, restricting allergens and sensitivities and lowering calories and fats--all while maintaining the delicious taste customers know and love.

KFC U.S. is working hard to reduce sodium in its products. The Brand began its journey to reduce sodium in 2007 working with suppliers to find options to reduce sodium without compromising product quality or unique taste. Great progress has been made to date, yet the brand recognizes there is still more work to do and is committed to addressing this nutritional improvement.

Amid raising concerns of Americans' sodium intake, Pizza Hut has successfully removed over half a million pounds of salt from its menu in 2012 and has plans to remove another 1.5 million pounds of salt from core ingredients in 2014.

Taco Bell U.S. has an ongoing commitment to reduce sodium levels, and teams are continuously evaluating ingredient technologies and functionalities with suppliers to help reduce sodium levels in Taco Bell food.

As part of our global nutrition strategy, the goal over the next four years is to phase out palm oil wherever feasible. They have been working toward that goal and today, nearly 70% of their global restaurants do not use palm oil as their cooking oil.

Pizza Hut U.S.'s Pan, Thin 'N Crispy<sup>®</sup>, Hand-Tossed Style and Stuffed Crust pizzas contain:

- zero grams trans fat
- no high fructose corn syrup
- only heart-healthy vegetable oils

#### Kids Meals:

As part of a broader Health and Wellness effort across the United States, Yum! has made a decision not to advertise its products on television programs specifically aimed at children under 12 years old. They also encourage markets outside the U.S. not to do so.

KFC continues to make improvements to Kids Meals and to explore opportunities for improving the product offerings and nutritional makeup of these meals. KFC now has a variety of Kids Meal options, including meals under 300 calories. For example, the Li'l Bucket Kids Meal, packaged in a kid-friendly version of KFC's iconic bucket, comes with a Kentucky Grilled Chicken<sup>®</sup> drumstick, green beans, GoGo squeeZ<sup>™</sup> applesauce and a Capri Sun Roarin' Water, for only 210 calories.

New to its portfolio are Pizza Hut's great tasting School Lunch Pizzas. Meeting the United States Department of Agriculture's National School Lunch Program and All Foods Sold in Schools nutrition standards, these kid-approved pizzas are made of 51 percent whole wheat crust, lite mozzarella cheese, and reduced fat and sodium pepperoni. Plans to develop and test lighter options for Pizza Hut's core menu have also been established.

## Darden Restaurants

Darden owns and operates more than 2,100 Red Lobster, Olive Garden, LongHorn Steakhouse, Bahama Breeze, Seasons 52, The Capital Grille, Eddie V's and Yard House restaurants in North America, employing more than 200,000 people and serving more than 425 million meals annually.

In September of 2011, Darden formalized their commitment to health and wellness through a public commitment, in partnership with the Partnership for a Healthier America (PHA). Darden focused their commitment on three areas where they felt they could have the most impact.

1. **Children's Menu:** Darden committed to enhance the nutrition credentials of the children's menus offered at Olive Garden, Red Lobster, Longhorn Steakhouse and Bahama Breeze. In addition to establishing a 'guiding principle' for children's meals (meals should be equal to or less than 600 calories, 30% of total calories from fat, 10% total calories from saturated fat and 600 mg of sodium), Darden has made the following changes to their children's menus:

- Offering at least one menu option that meets the 'guiding principle' and featuring those items in some way so that families can easily find the healthiest choice;
- Offering a fruit or vegetable as the default side item;
- Making an 8 oz. serving of 1% milk available with free refills. To encourage milk as the beverage of choice, it is promoted on the menu in some way. Carbonated soda is no longer displayed on Darden's children's menus;
- Ensuring any food illustrations on children's menus depict nutritious options;
- Refraining from advertising to children 12 years old and younger through any digital or television media.

**Calorie Reductions:** Darden has committed to reduce its calorie footprint by 10% by 2016 and 20% by 2021 across the brands it owned at the time of the commitment (Olive

Garden, Red Lobster, Longhorn Steakhouse, The Capital Grille, Bahama Breeze and Seasons 52). Darden provides data to Partnership for a Healthier America (PHA) on an annual basis so that PHA can verify Darden's progress. Darden's first public reporting will be in 2016.

2. **Sodium Reductions:** Darden has also committed to reduce the sodium content of its menus by 10% by 2016 and 20% by 2021 across the same brands listed above. Similar to the calorie commitment, data is provided to PHA annually. Darden will report out on their progress in 2016.

Once again, we appreciate the opportunity to provide these comments to the Dietary Guidelines Advisory Committee. Overall, the restaurant industry has been actively responding to consumers' interest in healthful offerings and nutrition information. Restaurants have been offering items that incorporate more produce, lean protein, whole grains, while limiting calories, sodium and unhealthy fats. We are committed to taking a long-range, proactive approach to how the industry meets evolving science based evidence as well as consumer attitudes towards nutrition.

Sincerely,



Joy Dubost PhD RD CSSD  
Director of Nutrition, National Restaurant Association

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