



February 10, 2025

Submitted electronically at www.regulations.gov

Janet M. de Jesus, MS, RD
Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary
Department of Health and Human Services
1101 Wootton Parkway, Suite 420
Rockville, Maryland 20852

RE: Request for Public Comments on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee (Docket No. HHS-OASH-2024-0017-0001)

Dear Ms. de Jesus:

SNAC International greatly appreciates the opportunity to provide comments on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee (DGAC). SNAC International is the international trade association for the snack food industry representing over 400 snack manufacturers and supplier companies worldwide. Through this letter we offer perspectives and specific comments on several areas that we hope will inform HHS and USDA as they work to develop the 2025-2030 Dietary Guidelines for Americans.

Scientific Report Findings

We appreciate the Committee's continued interest in snacking. In the Scientific Report, the DGAC found limited evidence about the frequency of eating and snacking's impact on health. Additionally, the report found that the frequency of daily snacking during childhood and overall snacking among adults may not be associated with outcomes related to body composition and/or risk of obesity. While the DGAC recommends nutrient-dense snacks as part of a healthy diet and suggests that the final Dietary Guidelines should provide specific strategies to improve the nutritional quality of foods and beverages consumed as snacks, we believe it is essential for USDA and HHS to consider the following snacking insights as they develop the 2025-2030 DGA.

The information below details the benefits of snacking, recent innovations in snack development, the nutritional value that snacking can provide, and the innovative use of food processing to create high-quality, nutrient-dense snack options.

Snacking Benefits

As mentioned in our prior comments to the DGAC in October 2023, there has been an evolution in snacking trends over the years. The traditional concept of three square meals a day has evolved. In its place, a dynamic and flexible approach to eating is taking shape and snacks and meals seamlessly



blend to fit modern lifestyles. Today, snacking is no longer just a casual pastime; it now accounts for half of all eating occasions in the U.S.,¹ with more than half of Americans occasionally or regularly replacing traditional meals with smaller meals and snacks. This shift reflects a larger transformation in how we view health — a move from simply avoiding illness to embracing a more holistic approach that nurtures physical, mental, and emotional well-being. In this new era, snacks are not just a treat; they have become an essential part of how we fuel and nourish ourselves.

According to the International Food Information Council's (IFIC) 2023 Food & Health Survey, 72% of Americans report eating at least one snack per day.² The most common reason for snacking is due to hunger or thirst (41%).³ Moreover, data from Circana indicates over half of consumers (54%) say snacks are an important part of their healthy eating plan throughout the day and 66% of consumers snack to fuel satiety throughout the day.⁴

For many, snacks are an integral part of daily healthy eating plans, offering more than just convenience. Consumers are increasingly seeking snacks that provide essential nutrients like protein, vitamins, and minerals, as well as fruits, vegetables, and whole grains. Today's snackers also want functional benefits from snacks that boost and provide energy, enhance performance, support recovery, and support immune response and mental, emotional, and gut health.

In response to this evolving demand, the snacking industry has adapted, launching a wave of innovation that caters to this new era of mindful eating. Whether it's functional ingredients, creative flavors, or on-the-go formats, the snack market is rapidly evolving to meet the needs of today's health-conscious and well-being-seeking consumers.

Nutrition Innovation

As consumers embark on their wellness journeys, the industry is stepping up—offering a wide range of "better-for-you" (BFY) options that balance taste and nutrition. Transparency is key, with clearer labeling and a diverse range of products catering to various dietary needs. Ingredients like chickpeas, fava beans, lentils, peas, and soy create nutrient-dense snacks, supporting demand for keto, paleo, gluten-free, and allergen-free choices.⁵ Notably, 34% of consumers buy snacks to support the diet they follow and 59% of consumers want snacks that contain additional health benefits.⁶

Convenience remains a driving force, with portion-controlled options like mini-snacks, individually wrapped servings, and resealable packaging meeting demand. Additionally, on-the-go snacks such as popcorn continue to see growth.⁷

¹ Hartman Group Future of Snacking October 2024

² IFIC 2023 Food & Health Survey: <https://foodinsight.org/wp-content/uploads/2023/05/IFIC-2023-Food-Health-Report.pdf>.

³ IFIC 2023 Food & Health Survey.

⁴ Circana Snacking Supernova Webinar: <https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:491d901a-c9fa-365d-b8e9-a6f323b05301>.

⁵ Official State of the Industry Snack World Special Edition 2023: <https://www.nxtbook.com/sosland/sw/snac-world-official-state-of-the-industry-2023/index.php#p/Intro>.

⁶ Circana Snacking Supernova Webinar.

⁷ Circana Snacking Supernova Webinar.



The industry has made strides in reducing sodium and added sugar while preserving taste. Over the past decade, 64% of snack categories have reduced sodium content,⁸ a move that reflects the industry's commitment to helping people make healthier choices while still enjoying flavorful treats. Alternative sweeteners, reduced-sodium ingredients, and natural flavors are being thoughtfully used to create snacks that are both satisfying and nourishing.

Yet, taste is still superior - 85% of consumers want snacks that have the taste they enjoy.⁹ Fortunately, the industry is reformulating traditional snacks to retain familiar taste profiles while enhancing nutrition. Snacks also serve as a nutrient delivery system, providing under-consumed food groups like fruits, vegetables, whole grains, and dairy.¹⁰ For busy consumers, snacks simplify nutrition, offering fortified options with whole grains and omega-3s to help bridge dietary gaps—making health-conscious eating both easy and enjoyable.¹¹

Food Processing

The snack industry is aligned with the DGAC's final conclusions that found limited evidence indicating dietary patterns with greater amounts of ultra-processed foods (UPF) are associated with a risk of obesity/overweight in adults. We are supportive of future committees continuing to examine the association between UPFs and growth, body composition, and risk of obesity as more evidence becomes available. As noted in prior comments, processing is essential for snack products for shelf stability, fortification, tailored product development, and the addition of ingredients. As future committees and policymakers make recommendations for and evaluate scientific literature, we urge the DGAC to fully consider the many important benefits of processing such as affordability, accessibility, food safety, and reducing food waste. Moreover, by utilizing processing, the snack industry continues to deliver products that improve nutrition and align with health-conscious lifestyles.

“Eat Healthy Your Way”- Beans, Peas & Lentils

The snack industry is also aligned with the DGAC's recommendations to increase plant-based proteins like beans, peas, and lentils. We would like to ensure beans, peas, and lentils continue to be considered under either the Vegetable Group or the Protein Group. Not only is the nutrition found in beans, peas, and lentils similar to foods in both the Vegetable Food Group *and* the Protein Foods Group, but the ability to count as either food group would also align with how beans, peas, and lentils are considered in new FDA Healthy final rule.

⁸ FDA Sodium Reduction in the U.S. Food Supply 2010-2022: A Preliminary Assessment of Progress accessed at: https://www.fda.gov/food/nutrition-food-labeling-and-critical-foods/sodium-reduction-us-food-supply-2010-2022-preliminary-assessment-progress#preliminary_results.

⁹ Circana Snacking Supernova Webinar.

¹⁰ Slavin & Hess. 2018. The benefits of defining “snacks”; US Department of Agriculture Agriculture Research Service, What we eat in America, 2017-2018, Snacks, Accessed at: https://www.ars.usda.gov/ARSEUserFiles/80400530/pdf/1718/Table_25_SNK_GEN_17.pdf.

¹¹ Circana Snacking Supernova Webinar.



We congratulate the Committee on completing their important work and we look forward to working with USDA and HHS as they create the final DGA policy document. If there are any questions, please feel free to reach out to Colleen Farley, SNAC International's Director of Advocacy & General Counsel, at cfarley@snacintl.org.

Respectfully,

Christine M. Cochran

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SNAC International