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Ambassador Susan Rice  
Director  
White House Domestic Policy Council  
Washington, DC 20500

**Re: ekaterra comments for the White House Conference on Hunger, Nutrition and Health**

Dear Ambassador Rice:

In preparation for the Conference on Hunger, Nutrition and Health, ekaterra, the largest global tea company, appreciates this opportunity to share with the White House our experience with addressing the health and wellness needs of the American population, while improving beverage offerings in the marketplace. We are pleased that the Administration is moving ahead with the development of a national food strategy to end hunger and increase healthy eating and physical activity within the decade. This strategy, goals and ensuing commitments are critical to address the overall health of the populations and as a beverage manufacturer we recognize we must play a role in achieving them.

We want to grow a world of wellbeing through the regenerative power of plants – for our farming communities, colleagues, investors and, of course, tea lovers everywhere. At ekaterra, we are empowering people to consume more nutritious products by researching health benefits of tea and herbals, applying this research to our portfolio, and sharing our scientific knowledge with a diverse audience, including consumers. We are committed to addressing nutrition issues in the U.S., including improving the nutritional profile of our portfolio, addressing public health challenges, and providing consumer education to encourage healthy beverage choices. Through our sponsorship and partnerships, we maximize the impact of our efforts to improve nutrition ekaterra seeks to accelerate the pace of change in the beverage industry through our leadership and collective support for public policies that ultimately address public health needs, expand nutrition education, and inspire others to also act. We recognize our responsibility to drive positive change by striving to develop products that support healthy, balanced lives and ensure a resilient supply chain. As part of our work, ekaterra actively supports the work of FDA, USDA, HHS, and lawmakers that remove barriers to innovation of healthier



products, encourage consumption of smart beverage choices, and support education efforts that help people consume healthier diets. We also aim to improve the quality and accessibility of information available to consumers about the products they purchase for themselves and their families.

The comments below detail ekaterra's largest global and U.S. brand, Lipton® and the focus we have had here in the U.S. on addressing heart health. In addition, we provide our recommendations for the National Strategy. We would like to address one of the pillars of the conference where we have the most experience and have actively advocated for policy change: empowering consumers to make and have access to healthy choices. We aim to be partners in this process and would welcome the opportunity to meet with the White House staff to further discuss the scope of potential commitments and offer insights from our experiences.

### **Lipton® and Heart Health**

Lipton is one of the most trusted tea brands in the U.S. with a diverse portfolio that offers something for everyone, whether you are looking for a cup of green, black, or herbal tea! Tea dates back thousands of years and is the most widely consumed beverage in the world next to water. We have long understood how important hydration is to good health. As an alternative to sugar sweetened beverages health authorities recommend drinking unsweetened tea. In fact, drinking unsweetened tea has been recommended for the first time in the Dietary Guidelines for Americans, which was published in December 2020. Because unsweetened tea is 99.5% water, it not only can contribute to your total fluid needs, but it also is a great tasting budget friendly beverage with zero calories and zero grams of added sugars.

In addition, a substantial body of scientific research suggests that consuming two to three cups of brewed, unsweetened black or green tea daily, as part of a well-balanced diet, can help support a healthy heart. Based on the latest scientific evidence, naturally occurring plant compounds found in tea called flavonoids can help support healthy blood flow essential for heart health. Daily consumption of at least 200-500 mg of flavonoids can help support a healthy heart as part of a diet consistent with the USDA's Dietary Guidelines.



To ensure the public is aware of the health benefits of consuming unsweetened tea and the benefits of flavonoids, Lipton® has been driving and executing a multi-pronged communication approach to raise awareness and drive positive impact on public health. In 2020, we introduced an on-pack claim that tea ‘can help support a healthy heart’ across our unsweetened brewed Lipton® green and black teas. We also began declaring the flavonoid content per cup for our core green and black unsweetened tea products. One cup of unsweetened green or black tea contains 150 and 170 milligrams, respectively of these naturally occurring flavonoids making tea one of the best sources in the diet. Our range of Lipton® unsweetened green & black brewed teas, including decaffeinated and flavored provide a range of flavonoid levels and thus, incorporating Lipton® unsweetened brewed green or black tea is a great option to contribute to the overall flavonoid content in your diet.

In 2021 our Lipton® team applied this knowledge to educate on the health benefits of unsweetened black and green teas – translating a potentially complex message around flavonoids into an easy-to-digest public awareness campaign. Lipton® highlighted all this in TV commercials, social media, in-store activity, and through a healthcare professional outreach program. They also sponsored the American Heart Association’s *Life is Why* campaign in early 2021 which continues today. Over 60% of Lipton’s portfolio, including unsweetened caffeinated, decaffeinated, iced, and flavored green & black tea provides the level of flavonoids per serving on pack, as well as displays the American Heart Association logo.





## **Bringing awareness to Women's Health**

It was great to build awareness around the impact of heart disease on women's health, which is an important, but sometimes little-known message. The year after, in February 2022, Lipton® celebrated American Heart Month by doubling down on their efforts to bring attention to heart health. Lipton's #TeaTalk campaign was aimed especially at women who, amid the pandemic, may have inadvertently neglected their own health by putting the care of their loved ones first. By encouraging women to prioritize their heart health by talking to family, friends, and doctors about their health needs, Lipton® really brought awareness and support. Online, the activity was seen over *half a billion* times – leading to a boost in performance, and best of all, publicity for what is potentially a life-changing message.

Lipton® is committed to continuing this health-promoting work. And we are looking forward to advancing and amplifying the research on the health benefits of unsweetened green and black tea.

## **Rationale for Recommendations & Final Recommendations**

Health claims, including approved, qualified and structure function as defined and regulated by the FDA serve as a vehicle to educate consumers on the healthfulness of foods and beverages. Many existing regulations on health claims were released in 1993 and have not been updated since. As such, there is an incongruence between FDA health claims and authoritative public health recommendations, including the current Dietary Guidelines for Americans and in general the latest scientific evidence. Consumers need current and accurate information to make healthy choices. There are naturally occurring compounds found in plant-based foods and beverages, including fruits, vegetables, cocoa, and beverages like tea and coffee, commonly referenced as bioactives, that support health beyond the traditional recognized vitamins and minerals. Bioactives are currently defined by NIH as “constituents in foods or dietary supplements, other than those needed to meet basic human needs, that are responsible for changes in health status.” Although traditional nutrients, such as vitamins, minerals, protein, essential fatty acids and essential amino acids, have dietary reference intake (DRI) values, there is no such evaluation process for bioactives. For certain classes of bioactives, such as flavonoids, substantial scientific evidence exists to validate a relationship between their intake and risk factors related to noncommunicable disease processes, leading to a reduced risk of disease. In addition, the study of bioactives and their relationship to disease risk is a growing area of research supported by government, academic institutions, and food and supplement manufacturers. Importantly, consumers are purchasing foods containing bioactives,



yet there is no regulatory process or the like in place to communicate to the public to help decipher the strength of the evidence behind the benefits or the quantitative amounts needed to achieve these beneficial health effects. For example, available evidence supports a beneficial effect of a class of bioactives called flavonoids on cardiometabolic outcomes (Raman et al, 2019). Many observational studies, numerous clinical trials, as well as systematic reviews and meta-analyses have found an association between tea consumption, which is the biggest contributor of flavonoids in the diet, and reduced risk of cardiovascular disease (CVD) (Arab et al., 2013; Balentine et al., 1997; Furrusi et al., 2019; Vinson et al., 2004). Furthermore, beverages rich in flavonoids, like tea have a positive impact on established surrogate markers of cardiovascular health, e.g. blood pressure (Geleijnse et al, 2002). Randomized, controlled trials (RCTs) find that black and green tea helps maintain healthy endothelial function (Ras et al, 2011) and can help maintain healthy blood pressure (Greyling et al, 2014). One of the most comprehensive published [scientific studies](#) on tea indicated daily tea intake as part of a healthy habitual dietary pattern may be associated with lower risks of cardiovascular disease and all-cause mortality among adults (Chung, 2020). Overall, the benefits of tea have been studied for over two decades with a preponderance of evidence indicating its benefit and positive impact on cardiovascular health.

Substantial and compelling scientific evidence exists to confirm a relationship between the intake of a specific bioactive constituent and positive impact on health conditions or reduced risk of a chronic disease. However, a key point brought forth in developing recommendation on bioactives is these compounds lack a DRI, which has not been developed by National Academy of Science and Medicine. Since the beginning of the development of DRI discussions, it was proposed that bioactives would be evaluated however this report never came out. Rather than waiting for DRIs to be developed we recommend there needs to be dietary recommendations on quantified dietary bioactive intake from foods and beverages based on the translation of quality scientific evidence published by either the FDA, USDA or other credible national health and government organizations. Just recently a peer-reviewed [scientific manuscript](#) was published which outlined and defined a framework for developing recommended intakes of bioactive dietary substances. Quantified ranges of intakes for dietary bioactives are a useful way to accurately relate dietary bioactive consumption with a specific health benefit(s) at levels found to be safe.



The absence of bioactive substances from the diet results in suboptimal health, e.g., poor cellular and/or physiological function. Without evidence-based recommendations, consumers may not understand the impact of these bioactive rich foods and beverages and/or seek information from available sources that lack scientific rigor when trying to make decisions about their nutrition—especially when it comes to bioactives. In addition, if we had recommendations on the intake of bioactives, such as flavonoids this would educate and inform consumers on the benefits of consuming food components, such as fruits, vegetables, and unsweetened tea and coffee which we know make up a good dietary pattern. Ultimately these dietary recommendations could assist in reducing the risk of chronic disease as we know that dietary patterns that include fruits, vegetables, whole grains, and unsweetened tea and coffee greatly reduce the risk of chronic disease. This could also unlock innovation as well as communication and educational opportunities to encourage consumption of these important dietary components which the majority of the population fall short in consumption. Based on what was shared in our earlier comments on Lipton®, tea flavonoids and heart health, and working within the current regulatory challenges as well as lack of awareness of bioactives (flavonoids) we see the potential policy change could have in impacting consumer awareness and ultimately shifting consumer behavior to positively impact better dietary choices and ultimately public health. **Thus, we recommend the FDA or other governmental agency develop a new framework and approach to current regulations on health claims, which includes claims relevant to food groups, essential nutrients and bioactives. In addition, we recommend USDA and HHS develop public health recommendations, including the Dietary Guidelines for Americans on well researched and identified bioactives, including flavonoids in the diet. Finally, we request that FDA propose and finalize the update of the definition of “healthy.” We believe that FDA’s approach to “healthy” should be based on the most recent recommendations within Dietary Guidelines for Americans, however we would recommend the definition of “healthy”, and the accompanying icon or symbol include food and beverages which provide essential nutrients and/or bioactives, including fruits, vegetables, and unsweetened tea.**

### Summary

In summary, ekaterra and our brands look forward to engaging with the government as well as non-governmental and industry partners to develop solutions to common goals in nutrition and health. We have practical expertise that can be helpful to the administration as it moves forward with this process. Working together, we can accelerate decision-making and action to improve the food supply.



While the industry is innovating and reformulating products to improve their nutritional profiles, it is critical to consider other components within the diet, such as flavonoids to support overall health and address chronic disease. We must also ensure the public is informed with information to support their overall diet. Rather than simply encouraging consumers to limit or avoid foods, companies and government should work together to empower and educate consumers about specific, actionable steps they can take to achieve a balanced, healthy diet to promote good health while enabling innovations and communication that can facilitate. ekaterra looks forward to continuing our work with the Biden Administration and Congress to address health and nutrition in America. We would welcome a meeting to further discuss and provide insight. Thank you for the opportunity to provide comments and recommendations on the National Strategy to tackle these important issues.

Respectively submitted,

A handwritten signature in black ink, appearing to read 'Joy Dubost', written in a cursive style.

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