

MEMORANDUM

To: City agencies/partners/city program participants

From: Philadelphia Department of Public Health, Division of Chronic Disease and Injury Prevention

RE: Revisions to the Nutrition Standards as mandated by Executive Order No. 4-14

Date: October 2021

Executive Order No. 4-14, passed in June 2014, directed the Health Commissioner's Office to develop nutrition standards to ensure that the City offers a broad range of healthy food and beverages to employees and constituents. Any contract awarded or executed by a City agency pursuant to solicitation commenced on or after July 1, 2014, that either calls for the provision of food or that provides for direct or indirect funding of the purchase, preparation, or service of food or beverages is required to comply with the standards. The Philadelphia Department of Public Health (PDPH) has been working with affected City agencies since 2014 to help them implement the standards into their contracts and food purchasing, preparation and service activities. Prior to the official release of the standards, City agencies reviewed drafts and provided feedback.

Per the Executive Order, the Health Commissioner's Office can, as appropriate, amend the standards in accordance with the latest scientific data and dietary guidance. The standards were first revised in 2016. In light of the newly released 2020-2025 USDA Dietary Guidelines for Americans and other updated guidelines, the Nutrition Standards have been revised again to align with these science-based recommendations. This memorandum details the revisions both generally and by section.

The Department of Public Health is soliciting public comments on the revised standards and will incorporate feedback into the revisions as able. To view the draft standards, visit www.phila.gov/nutritionstandards and submit feedback via the online form [here](#).

There are 2 documents we are asking for feedback on- one is the primary document (Philadelphia Comprehensive Nutrition Standards) that applies to all City departments that purchase, serve, sell or otherwise provide food. It includes standards for foods as purchased, served (as in menus), daily nutrient recommendations and snack standards, standards for vending machines on city-owned or leased property as well as population-specific recommendations and exceptions. It also includes best practices around healthy meetings/party/catering, concessions and values-based purchasing.

The other document (Nutrition Standards for Early Care and Education Facilities) is specific to child care facilities funded directly by the City, and includes other guidance around infant feeding, breastfeeding/chestfeeding, physical activity and screen time. The standards for purchased foods, meals served, nutrient standards and snacks are generally the same in both documents, but there are pieces included in each that may not be in the other given the nature of the audience. You will see comment boxes in the documents noting what the main changes are from the previous versions.

For more information about the Executive Order, Nutrition Standards or the Health Department's work with City departments to implement the standards, visit www.phila.gov/nutritionstandards.

General revisions:

- Aligned with the 2020-2025 USDA Dietary Guidelines, NYC Department of Health and Mental Hygiene Food Standards and other existing standards
- Added content about the implementation process, priority areas, and online nutrition standards training modules
- Added language pertaining to COVID-19 considerations
- Included more inclusive language that refers to all breastfeeding, chestfeeding and human milk feeding individuals
- Added more food categories and specific foods to the purchased food standards
- Added food categories to meals served standards
- Added language specific to cultural food accommodations and religious preferences
- Updated daily sodium requirements for children according to the 2020-2025 Dietary Guidelines for Americans
- Updated the population-specific and exceptions standards
- Updated healthy meeting/party/catering guidelines
- Tightened up the language to be more direct and specific
- Updated sustainability guidelines to align with the Philadelphia Food Policy Advisory Council's value-based purchasing criteria
- For child care-specific standards, included comparison of Philadelphia Nutrition Standards to the Child and Adult Care Food Program (CACFP) standards, added information about water safety and promotion, updated the physical activity and screen time standards, and provided additional resources in an Appendix.

Specific revisions by section:

Section I: Purchased Foods

- Updated deep frying category- specified a limit on purchasing breaded, pre-fried products like chicken nuggets, chicken patties and fish sticks
- Beverages- added a limit on beverages with artificial sweeteners for adults (already had a restriction for youth)
- Dairy- yogurt- added to choose products with less added sugar
- Grains/starches- added sugar limit for breakfast breads/pastries
- Cereals, hot or cold- specified that youth-serving facilities should follow CACFP/WIC limit for amount of sugar per serving
- Added a category for vegetable and/or blended meat protein products- with a sodium limit
- Changed the luncheon/deli meat category to more broadly encompass processed meat; added a sodium limit for bacon/other processed meats

Section II: Meals and Snacks Served

- Meal standards

- Fruits and vegetables- added as a required standard that a variety of fruits and vegetables should be served
- Water- specified that tap water be available
- Added an artificially sweetened beverage category (for adults)- serve no more than once per week
- Changed the luncheon/deli meat category to more broadly encompass processed meats- serve no more than 2 times per week; added a recommended standard to gradually phase out service of processed meats
- Added a breaded, pre-fried product category- limit service to no more than twice per week; added a recommended standard to gradually phase out service of breaded, pre-fried products
- Added plant-based language to the vegetarian category
- Added language to accommodate cultural and religious food preferences and offer food and beverage options that reflect diverse cultural traditions and religious practices; added a recommendation to not serve pork products to honor religious dietary practices
- Nutrient standards
 - Updated sodium limits for children based on the 2020-2025 Dietary Guidelines for Americans
 - Added daily amount of added sugars (in grams) to complement the % of total calories

Section III: Population-specific Standards and Exceptions

- Added standard that City departments should involve participants in the decision-making process around food and collect feedback from them at least annually on food service, food quality, and variety. This feedback can be used to inform future menu planning, food purchasing and recipe development. City departments should be open to participant's feedback on the food that is served and provide opportunities for choice and cultural and religious food preferences.
- Updated the requirements for agencies that serve school-age children to align with National School Breakfast and School Lunch program
- Added section on standards specific to agencies that may serve pregnant and lactating persons
- Added section on standards specific to early childhood education programs/facilities that serve infants and children under 5 years of age
- Updated the exception for donated foods- agencies should not serve foods with artificial trans fats or partially hydrogenated oils in the ingredient list

Section IV: Vending Standards for Beverages, Snacks and Meals

- Updated nutritional labeling section to align with the FDA's front of package calorie labeling criteria

Section V: Healthy Meeting/Party/Catering Guidelines

- Added more context for this section and included Catering
- Aligned guidelines with the Philadelphia Department of Public Health's Healthy Meeting Policy

Section VI: Sustainability Guidelines

- Changed this section to align with the Philadelphia Food Policy Advisory Council's recommendations around values-based purchasing, which includes sustainable sourcing, fair labor practices, and local purchasing

Section VII: Public Concessions and Special Events Best Practices

- Removed Catering from this section and added to Section V