

February 7, 2025

Department of Health and Human Services  
Office of the Secretary  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

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Office of the Secretary  
1400 Independence Ave., S.W.  
Washington, DC 20250

Submitted electronically via [www.regulations.gov](http://www.regulations.gov)

***RE: Scientific Report of the 2025 Dietary Guidelines Advisory Committee, Docket HHS-OASH-2024-0017***

The National Automatic Merchandising Association (NAMA) appreciates the opportunity to comment on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee.

Founded in 1936, NAMA is the association representing the U.S. convenience services industry, with its core membership comprised of owners and operators of vending machines, micro markets, office coffee, tea, water, and pantry services. With nearly 1,000 member companies—ranging from small businesses to globally recognized brands—our industry employs 160,000 Americans and contributes \$34.9 billion annually to the U.S. economy.<sup>1</sup>

Unattended retail and vending machines are integral to the retail landscape, providing convenient, 24/7 access to a wide variety of food and beverage options. From students seeking a quick and nutritious breakfast to delivery drivers needing refreshments on the go, the industry meets the evolving needs of consumers nationwide.

NAMA appreciates the Committee's acknowledgment that limited evidence suggests snacking is not associated with adverse outcomes such as obesity. Snacks play an important role in complementing diverse dietary needs. In fact, more than half (56%) of Americans replace traditional meals by snacking or eating smaller meals.<sup>2</sup> The convenience services industry provides a wide array of options tailored to consumer preferences, from indulgent treats to better-for-you choices.

American consumers often utilize unattended retail options like vending machines and micro markets to conveniently access a range of food and beverage items— including snacks, fresh fruit, sandwiches, salads, hot and prepared meals, coffee, tea, water, juice, carbonated drinks, and sports beverages. The

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<sup>1</sup> <https://namanow.org/voice/economic-research/>

<sup>2</sup> International Food Information Council. 2024 Food & Health Survey. June 20, 2024.

offerings from NAMA's members depend on consumer tastes, demand, and client requirements, e.g. hospitals, schools, government buildings.

NAMA's members are committed to offering "better-for-you" options in the unattended retail channel. Through NAMA's Public Health Commitment, NAMA's member companies are voluntarily raising the number of better-for-you options by nearly 40 percent above the 2019 baseline, with the goal being one-third of all options offered to consumers meeting the better-for-you criteria.<sup>3</sup> This flexible, consumer-driven approach ensures that offerings are tailored to specific needs and avoids a one-size-fits-all model that limits choice.

The Committee acknowledges that it was "unable to review the quality of snacks consumed," due to limiting factors in the studies reviewed.<sup>4</sup> Yet despite this lack of evidence, the Committee's recommendation to the Departments is that the "*Dietary Guidelines for Americans, 2025-2030* provide specific strategies to improve the nutritional quality of foods and beverages consumed as a snack."<sup>5</sup> This recommendation is premature and assumes that current snack foods contribute to negative outcomes without supporting evidence.

Due to the lack of studies for the Committee to review and base any such conclusions, NAMA believes this recommendation is not appropriate at this time. Further, any future recommendations to the Departments about snack food and beverage options should be grounded in comprehensive, evidence-based studies that meet the rigor of the Dietary Guidelines Advisory Committee's standards.

The *Dietary Guidelines for Americans, 2025-2030* will play an important role in shaping public health. Recognizing the importance of these guidelines, NAMA is committed to working with the Departments as a partner to enhance consumer access to diverse food and beverage options that are proven to lead to better health outcomes.

Sincerely,



Matt Bisenius  
Vice President, External Affairs

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<sup>3</sup> <https://namanow.org/convenience-services/public-health-commitment/>

<sup>4</sup> 2025 Dietary Guidelines Advisory Committee. 2024. *Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture*. U.S. Department of Health and Human Services. <https://doi.org/10.52570/DGAC2025>

<sup>5</sup> Id.