

May 1, 2019

Oregon State Legislature  
Senate Health Committee  
900 Court St NE  
Salem, OR 97301

Re: HB 3342 related to plant-based meals

Chair Monnes Anderson, Vice Chair Linthicum and Members of the Senate Health Committee:

I am a Registered Dietitian Nutritionist (RDN). I worked for more than 12 years as a long-term care (LTC) consultant RDN; developed menus for a LTC consulting company and was the Nutrition and Foodservices Director, at Capital Manor Retirement Community in Salem, OR for ~ 5 years. I currently direct and deliver the instruction and training in the Dietetics and Nutrition in Foodservice Systems undergraduate and graduate programs at Oregon State University, the only Oregon university offering these degree programs. My research focus is food choice and eating behavior. I am writing to express my opposition to HB 3342.

My apologies as my schedule prevents me from offering live testimony to the Senate Committee today.

**HB 3342 imposes challenges to the optimal nutritional care of Oregonians in healthcare facilities**

- The most impactful challenge is in regards to defining plant-based meals as being “vegan”, a restriction that prevents all animal foods and animal by-products used in other foods.
  - Animal foods and products are used extensively as main ingredients (meat, eggs, dairy), but in many other foods that use those ingredients for their role in preparing them (breads and baked goods, sauces, etc. (see attachment, Vegan Menu Planning))
  - Popular media promotes vegan diets for weight loss and while that may be desirable for the average American adult, estimates for LTC residents is that 50% have inadequate food and fluid intakes and struggle with unintended weight loss
  - The research is mixed on the health benefits of a vegan diet, with some clear benefit. However, researchers agree that it is impossible to determine if those benefits are from ELIMINATING animal products or simply the benefit gained by consuming more plant foods.
  - Animal foods (in contrast to legumes and vegetables) offer complete proteins (eggs being the best), which are needed daily for fighting infections, wound healing and simply maintaining our body function and tissues. Grains have to be consumed with legumes or vegetables to make the meal have complete protein. In LTC, appetite is the major problem.
  - Vegan meals must be carefully planned to include nutrients that are simply very limited with plant-only protein sources (See attachment, Vegan Menu Planning).

## HB 3342 imposes challenges to operational efficiencies of Oregonians in LTC facilities

- Residents or families are interviewed to collect dietary preferences and currently offering preferences and alternatives to a menu offering is required with the ORS for LTC residential facilities. This makes this bill unnecessary.
- Offering a vegan “menu” (in contrast to offering an individual food substitute) implies that the site can provide a set of complete vegan choices at all times. This means not just more plant foods, vegan food products, but the ingredients necessary to substitute for those recipes that require dairy or eggs (See substitutes on attachment, Vegan Menu Planning)
  - Cooking foods to make them vegan involves finding ways to replace all dairy and eggs in products and in animal by-products used in foods (e.g, sugar, honey, oils, etc.). This would involve added cost for the increased food preparation skills needed by Dietary Managers and Cooks, and for the time paid to the Consultant RDN to write a Vegan Menu.
  - Having vegan ingredients always available means that they must be on-hand for production in LTC; contributing to the cost of the initial purchase, as well as the associated storage costs.
  - Waste disposal is a significant cost to all food operations (and to climate change!). There is greater waste in fruits and vegetables trim losses (all, but primarily when fresh) and in disposing of vegan ingredients/foods that are not used but become out of safe-use dates.
  - There are limited options of vegan entrée choices. Legumes, vegetable and soy choices are predominant, decreasing the variety of foods available. Variety in menu offerings increases food acceptability and would be a concern in LTC.
  - Challenges to food/fluid intake requires the use of supplemental, typically high quality (e.g., animal) protein. Approximately, 20-30% of LTC residents require such supplements. These would need to be assured that they are vegan and the quality of the supplement would be difficult to achieve.

Thank you for the opportunity to share my concerns regarding the HB 3342

Sincerely,

Mary Cluskey, PhD, RD  
Associate Professor Nutrition,  
Dietetic Program Internship Director  
Program Director, Nutrition in Foodservice Systems  
Oregon State University