

MEMO

Date: 17 November 2020

To: Jonathan Smith, Author of "Notice of Intention"

From: Savannah Hernandez, University of Wisconsin-Whitewater

Re: "Notice of Intention" Analysis and Revision

The purpose of this memo is to analyze and revise the document "Notice of Intention" to make it accessible and easily understandable to readers.

ANALYSIS

This document has important stylistic issues regarding coherence and emphasis. This is because topic strings are inconsistent and new information is not properly emphasized.

TOPICS ARE INCONSISTENT

Coherence is how well a paragraph makes sense when all of the sentences are put together. Essentially, each paragraph should have one overarching topic or idea. In order to have coherence, the topic string in a paragraph must be consistent. What this means is that the topic must be the same or at least draw on the same information as the last sentence. This helps readers understand what the main idea of the paragraph or paper is, in order to make it easier to understand.

For example, in the "Background" paragraph, the first topic is restaurants. The paragraph continues to have topics like safe and healthy dining, the Department, public health concern, and New York City restaurant patrons. Some of these topics relate to each other, but most of them are random and inconsistent. The topics should be modified to focus on restaurants.

This is the same with the "Basis for restricting service of products containing artificial trans fat" paragraph. The topics are as follows: heart disease, scientific evidence, dietary trans fat, scientific studies, saturated fat, scientific studies, and dietary trans fat. This paragraph does better with having topics that relate to one another, but there are still some that draw from nothing. These topics should focus from scientific studies and heart disease.

The paragraph after this can be revised in the same way. The topic string is dietary trans fat, trans fat, the Institute of Medicine, the 2005 Dietary Guidelines, the American Heart Association, FDA's mandatory listing of trans fat content. This paragraph can be revised to have a topic sentence that includes a hyper comment mentioning institutions. This is because the different institutions pop up and are seen as new topics with no earlier mention. If it is mentioned that there are institutions, listing these institutions will be more coherent.

The last paragraph is arguably the least coherent of the notice. The topic string is: major source of dietary trans fat, Denmark, Canadian Trans Fat Task Force, Zero grams trans fat packaged foods, many manufacturers, New England Journal of Medicine article, this experience, healthier alternatives, newer trans fat-free oils, educational and enforcement efforts, US companies. The same can be done as the previous paragraph.

The table below displays how the topics throughout the paragraph are random and unrelated to each other. If the topics were all similar or drawing off of the same information, the table would clump left. Since the topics are all different, the table skews to the right. The asterisks further emphasize that the topic has not been mentioned in a previous sentence.

Before revision:

Major source of trans fat							
	Denmark*						
		Canadian Trans Fat Task Force*					
			Packaged foods*				
				manufacturers*			
					New England Journal of Medicine Article*		
						experience*	
Trans fat free oils							Education al and enforcement efforts*
				Companies			

To fix this issue, a topic sentence can be added to the beginning to make sure all topics draw from the same idea (hyper comment). For the last paragraph, I made the topic sentence focus on the different countries and manufacturers that hope to replace artificial trans fat, as shown in the revision. This makes sure all topics are drawing back to one idea. I also moved some of the sentences to be clumped together, such as when Denmark is mentioned or when the US is mentioned, to improve cohesion.

After revision:

Major source of trans fat	Many countries Denmark
Trans fat content	
	Denmark
	Canadian Trans Fat Task Force
	The US
“zero grams” trans fat	
Trans fat	
Trans fat-free oils	
	US companies
A shift from trans fat	

As shown in the table above, coherence significantly improves with the addition of a topic sentence and by shifting some of the sentence placements. Rather than skewing right into eight separate columns, all topics clump left into only two columns. All asterisks have been removed as the separate countries were mentioned in the topic sentence, and mentions of trans fat have all been moved to be the topic of their sentences.

I completed this progress for all paragraphs in the notice. While not all paragraphs have multiple topics to address coherence, the larger paragraphs were all revised to have consistent topic strings.

NEW INFORMATION IS NOT EMPHASIZED

In order to get a point across and make the topic of the notice obvious to readers, new information must be emphasized. In order to emphasize, the new information must be presented at the end of the sentence (the emphasis position).

At the beginning of the notice, a sentence that is not correctly emphasized is “An estimated one third of daily caloric intake comes from foods purchased in restaurants.” Here, “foods purchased in restaurants” is placed in the emphasis position, even though readers already know that that is what the notice is about. The new information is “one third of daily caloric intake.” In order to emphasize new information to make the document more understandable, this sentence can be revised to say “Foods purchased in restaurants makes up an estimated one third of daily caloric intake.”

Another sentence that can be improved is “Scientific evidence demonstrates a clear association between increased trans fat intake and the risk of coronary heart disease.” The new information here is the scientific evidence. To emphasize the new information while also following coherence, the sentence can be revised to say “The risk of coronary heart disease has a clear association with increased trans fat intake, as demonstrated

by scientific evidence.” Here, the sentence draws on past information with heart disease at the start. Scientific evidence is emphasized by being the last words in the sentence. In the last paragraph, some revisions can be made to also improve emphasis. For example, in the last sentence of the notice, I flipped “educational and enforcement” to the end of the sentence because this is the new information. “A shift from trans fat” is information that has already occurred previously in the paragraph.

Another example is the sentence “Eighty percent of dietary trans fat is found in industrially-produced which is used for frying and baking and is present in many processed foods.” The new information is once again the factual information: the “eighty percent.” To emphasize this, the sentence is revised to say “Industrially-produced PHVO, which is used for frying and baking and is present in many processed foods, makes up eighty percent of dietary trans fat.”

REVISION

Background

Restaurants (the term is being used interchangeably with “food service establishments” or “FSE’s”) are an important source of daily food intake for New York city residents. Foods purchased in restaurants makes up an estimated one third of daily caloric intake. Assuring safe and healthy dining options is a public health priority. As defined in 81.03(j) and (p) of the Health Code, all New York City FSEs and non-retail food processing establishments are issued permits and inspected by the Department. Through the proposed amendment, the Department is addressing the public health concern of the presence of trans fat in foods served in restaurants. We see this as a dangerous and entirely preventable health risk to restaurant goers. Yet New York City restaurant patrons currently have no practical way to avoid this harmful substance.

Accordingly, we propose that the Board of Health amend Article 81 of the New York City Health Code to restrict the service of products containing artificial trans fat at all FSEs.

The Department is charged with preventing and controlling diseases, including chronic disease, through approaches that may address individual behavior or the community environment. We can reduce New Yorkers’ exposure to an avoidable hazard in the food environment by restricting FSEs from serving food that contains artificial trans fat, except for food served in the manufacturer’s original sealed package.

Basis for restricting service of products containing artificial trans fat

Heart disease is New York City’s leading cause of death. In 2004, heart disease was the cause of death for 23,000 New York City residents and nearly one-third of these individuals died before the age of 75. The risk of coronary heart disease has a clear association with increased trans fat intake, as demonstrated by scientific evidence. Scientific studies have found that most dietary trans fat is found in partially

hydrogenated vegetable oil ("PHVO") - oil that has been chemically modified. These scientific studies examine the change in cholesterol levels when trans fat is replaced with currently available heart healthy alternatives and estimate a reduction in coronary heart disease events such as heart attacks of 6%. Even in the most conservative estimates, based on replacing trans fat primarily by saturated fat - an unlikely outcome given the widespread trend of healthier fats by food producers - a significant, but more modest reduction in coronary heart disease events is still expected. Other scientific studies, based upon observing large groups of people over time estimate that by replacing trans fat with healthy alternatives, coronary heart disease events could be avoided by up to 23%. Cardiovascular risk for New York City diners is contributed to by the continued presence of PHVO in restaurant foods, because food purchased in restaurants represents an estimated one third of dietary trans fat.

Because dietary trans fat increases the risk of heart disease by elevating LDL ("bad" cholesterol), many institutions recommend lowering trans fat intake. Dietary trans fat lowers HDL ("good" cholesterol) and because of its negative effect on "good cholesterol", trans fat appears to be even worse than saturated fat. The Institute of Medicine ("IOM") reviewed the scientific evidence and concluded that there is "a positive linear trend between trans fatty acid intake and total and LDL concentration, and therefore increased risk of coronary heart disease". The 2005 Dietary Guidelines for Americans, issued by the United States Department of Agriculture ("USDA"), recommends that dietary intake of trans fat be "as low as possible". The American Heart Association guidelines issued in June 2006 recommend that trans fat intake be kept below 1% of total energy intake. In January of 2006, the FDA's mandatory listing of trans fat content on nutrition facts label of foods came into effect.

Industrially-produced PHVO, which is used for frying and baking and is present in many processed foods, makes up eighty percent of dietary trans fat. The remaining 20% is naturally occurring and is found in small amounts of dairy and meat products from ruminant animals.

The artificial trans fat found in PHVO is produced when hydrogen is added to vegetable oil in a process called hydrogenation. Foods fried in partially hydrogenated vegetable oils are therefore a common FSE source of artificial trans fat. This includes and is not limited to: margarine and vegetable shortening, prepared foods such as pre-fried French fries, fried chicken, taco shells and donuts, baked goods such as hamburger buns, pizza dough, crackers, cookies, and pies; and pre-mixed ingredients such as pancake and hot chocolate mix.

The major source of dietary trans fat, found in PHVO, can be replaced with currently available heart healthy alternatives, so many countries have made attempts to lower trans fat intake through packaging and restaurants. Denmark has recently successfully removed artificial trans fat by limiting total calories from fat in industrially produced trans fat content in food to only 2%. Trans fat content restriction in Denmark was reported by industry and government representatives in a recent New England Journal of Medicine

article to “not appreciably affect the quality, cost, or availability of food”. Denmark demonstrates that artificial trans fat can be replaced without consumers noticing an effect. In addition, in June 2006 the Canadian Trans Fat Task Force issued a report recommending that Canada limit trans fat in food service establishments to 2% of total fat content in margarines and vegetable oils and 5% of total fat content in all other food ingredients. The US has been extensively marketing “zero grams” trans fat packaged foods, both new products and those already in production since the labeling requirement for packaged foods became effective. “Zero grams” trans fat (defined by the FDA as <0.5 grams per serving) products are now widely available on supermarket shelves as many manufacturers have reformulated existing products. The trans fat found in PHVOs has acceptable healthier alternatives such as traditional mono and poly unsaturated vegetable oils (e.g. canola, corn, olive, etc.) that have not been hydrogenated, as well as newly developed oils such as those made from specifically cultivated varieties of soybeans, safflowers, and sunflowers. Further, many of the newer trans fat-free oils have favored characteristics of PHVOs such as long “fry lives”. US companies are already expanding production of products that will increase market supply of alternatives to hydrogenated oils. A shift from trans fat to healthier fats will be promoted by educational and enforcement efforts.