

March 26, 2010

Director, Office of Executive Secretariat

USDA, 1400 Independence Ave. SW

Room 116-A Whitten Building

Washington, DC 20250

RE: Federal Register 75 (50). Taskforce on Childhood Obesity: Request for Information

Dear Sir or Madam:

Thank you for the opportunity to submit comments to the Taskforce on Childhood Obesity. We strongly agree that childhood obesity is a complicated problem with no easy or single answer and we commend you for tackling this critical issue.

We would like to comment on some, but not all, of the Taskforce's responsibilities and questions as outlined in the *Federal Register* notice dated March 16, 2010.

Taskforce responsibility

1) To ensure complementary efforts and avoid duplication:

We believe the best way to ensure complementary efforts and avoid duplication is to help USDA publicize and educate the public about the Dietary Guidelines for Americans (DGA) and MyPyramid as the basis for good nutrition. The federal government spends thousands of dollars developing these tools but lacks the budget necessary to publicize and properly market these excellent tools and to fully educate consumers on how to use them. USDA's *MyPyramid Partner Program* has been a very successful endeavor between government and industry to develop and execute materials to promote the DGA and MyPyramid to the widest possible audience. A similar effort tied to *Let's Move*, would help extend government resources while ensuring that all entities are delivering the same message to the consumer. We should effectively use the tools we already have and streamline efforts before inventing new layers and products that could confuse intended key messages.

Matters to be Considered:

7) What concrete, specific actionable recommendations or guidelines would help parents reduce the risk that their child will become overweight or obese and how can their effectiveness be measured?

Again, we want to emphasize the need for promoting the DGA and not confusing parents or care-givers with other information. These guidelines have been well-researched and based on emerging sound science over the years and if people followed them, we would have slimmer,

healthier, more active citizens, both young and old. The guidelines embrace all foods in moderation and emphasize increased exercise. The Healthy Eating Index (HEI) is available online to measure adherence to the guidelines. The majority of homes, and all schools, have access to the internet. Curriculums could be developed for science/health classes so each older student could analyze their diets and physical activity. Guideline adherence for younger kids (2 and older) would have to be the responsibility of their parents and care-givers.

One way adherence and/or success should **not** be measured in children is by using BMI. USDA/ARS Children's Nutrition Research Center investigated the accuracy of using BMI to assess children in a multiethnic population. The researchers found that 17% of the children with normal percentages of body fat were incorrectly classified as "at risk of overweight" or "as overweight."⁽¹⁾ Scheier expressed concern that schools may falsely mislabel a needless number of children as overweight based on BMI screening.⁽²⁾ A recent study by Flegal et. al⁽³⁾ concluded "Particular caution should be exercised in interpreting comparisons of high BMI ranges between race-ethnic groups in terms of adiposity and in interpreting the prevalence of intermediate BMI ranges in terms of high adiposity."

At the same time, the Taskforce must address the importance of self-esteem and body acceptance among adults and children. A recent world wide study showed that body dissatisfaction and desire for thinness is commonplace in high-SES settings across world regions, highlighting the need for international attention to this problem⁽⁴⁾. "Loving one's body, motivates people to take care of their bodies. People with high body esteem and self-esteem want to keep their bodies healthy. They view themselves as valuable people who have something to contribute to society, and they want be around as long as possible to make that contribution."⁽⁵⁾

People come in all sizes and shapes. The "ideal body or ideal weight" are forced on people (primarily girls and women) with little or no scientific basis and cause undue stress and body dissatisfaction which may lead to eating disorders. While we must help prevent childhood obesity, it is important that we do not do it at the expense of children's self-esteem. The Taskforce should be sure to include experts in this area as well as nutritionists and exercise physiologists as they move forward to develop their recommendations.

12) Specifically with regard to objective 1 (empowering parents): How can Federal, State, and local governments, the private sector, and community organizations best communicate information to help parents make healthy choices about food and physical activity?

Again, we would suggest that *Let's Move* follow the successful *MyPyramid Partner Program* by creating an organization of private and public nutrition-related companies to help promote the recommendations of the Taskforce, the DGA and MyPyramid. This would ensure that all parents and care-givers are hearing and giving the same streamlined messages to help prevent childhood obesity. Our organizations (see page 5) are very active in reaching the public through in-store promotions, websites, public events, newsletters, advertising and other forms of communication.

13) Specifically with regard to objective 2 (healthier food in schools); What are the most promising steps that can be pursued by the Federal, State, and local governments, the

private sector and parents to ensure that children are eating healthy food in schools and child care settings?

The entire grain chain has always been involved in the school meal program. As one example of this commitment, the School Nutrition Association (SNA) recently acknowledged USA Rice Federation for 30 years of continuous support in the interest of healthier school meals.)

The Dietary Guidelines for Americans provide excellent guidance for schools to follow in developing daily menus but additional funding and support is critical to ensure children have access to healthy foods. For instance, many children will not have access to whole grains except through feeding programs so it is important that the funding be available for whole grain products.

The American Bakers Association (ABA), Grain Foods Foundation (GFF), North American Millers' Association (NAMA), Wheat Foods Council (WFC) and other members of the wheat chain, successfully advocated with Congress to include \$4 million in the 2008 Farm Bill authorizing USDA's Food and Nutrition Service, through a one-year Grain Purchase Program (GPP), to "encourage greater awareness and interest in the number and variety of whole grain products available to schoolchildren, as recommended by the 2005 Dietary Guidelines for Americans."

The wheat chain's proactive efforts helped establish this program and are an important step in enhancing nutrition for our nation's school children and will help educate them about the benefits of eating grain-based foods. USDA used the GPP funds to purchase and make available to schools whole wheat pancakes for breakfast and whole wheat tortillas for lunch during the second half of the 2009 school year (February – September). USDA offered the program in every state, with 41 states and Puerto Rico positively responding. As required by the Farm Bill, the effectiveness of the GPP will now be evaluated through a plate waste study and survey being conducted by Texas A & M University.

ABA, GFF and NAMA are continuing to meet regularly with USDA to monitor the success of the program and, along with other members of the grain chain, are actively working with Congress to identify funding to continue, as well as potentially, expand the program. Through this ongoing, proactive effort additional whole grain products have been introduced to children across our nation. Most recently, Secretary Vilsack approved whole grain pancakes and whole grain tortillas as reimbursable commodity foods for the school breakfast and lunch program. We would like to see this program expanded with additional whole grain products and made available to all 50 states and territories. It is a good example of a successful, new initiative to enhance the healthful diets of school aged children.

Increasing accessibility to whole grain foods via USDA Food Distribution (FD) Programs is an important step to meeting several key objectives outlined by the Taskforce, namely ensuring access to healthy, affordable food and providing healthier food in schools. FD Programs play a vital role in helping to feed low-income populations that are particularly at risk for childhood obesity. Promoting whole grain choices in the Supplemental Nutrition Assistance Program (SNAP), the school meals program, and the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) is an essential step in introducing whole grain foods to

the diet at an early age and increasing acceptance of these foods. Expanding options for whole grain choices in the USDA commodity foods program – as highlighted in 2008 with the addition of whole grain pastas, breads and tortillas – will help to encourage increased consumption of whole grains and promote a nutritionally complete diet that provides the essential vitamins, minerals and phytonutrients necessary for proper growth and development.

USA Rice Federation's Healthy Rice Bowls for Schools program (www.menurice.com) has helped school menu planners increase whole grain brown rice servings and vegetable consumption while at the same time providing popular and good tasting ethnic meals that appeal to today's diversified school populations, many of whom are familiar with rice through family culinary traditions. This program serves as a useful example of how grain groups can work with schools to help achieve improved school menus.

Because people are so far removed from the farm and the origins of the food they eat, the Wheat Foods Council will be bringing a live, growing field of wheat to our nation's capital in September 2010. This experiential exhibit will showcase all the phases of wheat from "farm to fork" – agriculture, milling, baking, nutrition and retail, thus educating the public about the goodness of wheat.

Last spring the Grain Foods Foundation partnered with *Feeding America* to help nourish families across the country. A virtual "Bread Art Museum" (www.gowiththegrain.org) was created online to engage and educate consumers about the Dietary Guidelines, MyPyramid and basic nutrition while raising money for *Feeding America*. For every piece of digital bread art created, the Grain Foods Foundation donated \$1 to Feeding America for a final tally of \$75,000 going to hungry families. This consumer friendly, interactive, educational program is continuing this spring with *Share our Strength* the benefactor of up to \$100,000.

Bob Harper, of the *Biggest Loser*, was recruited by the Grain Foods Foundation last fall to educate the consumer about the role of grain foods in a healthful diet and the importance of physical activity. Over 10,000 consumers entered an online sweepstakes to win a work-out session with Bob. He also conducted numerous interviews with the media and "warmed up" the men and women racers at Fitness Magazine's *Body, Mind and Spirit Games* in New York City, September 12.

While we support increased consumption of whole grains, it is also true that enriched grains provide numerous benefits to children: A study published in the October 2009 issue of the *Journal of the American Dietetic Association* ⁽⁶⁾ shows that rice eaters have healthier diets than non-rice eaters. The study further shows that eating rice helps improve overall diet and potentially reduces the risk for many chronic diseases, including obesity, cardiovascular disease and Type II diabetes.

Another study, using NHANES data for 5-16 year old children ⁽⁷⁾ found that grain intake was inversely correlated with C-Reactive Protein (CRP). Therefore, more grain intake was associated with lower levels of inflammation. Most interesting is that enriched grain intake was actually beneficial...i.e., the lowest level of CRP was associated with the highest enriched grain intake. (There is no such finding for whole grains, but that is most likely due to the fact that whole grain intake was so low that the study did not have sufficient statistical power to detect associations with whole grains and CRP). High grain intake was also associated with lower body weight (BMI) and waist circumference.

15) Specifically with regard to objective 4 (physical activity): What steps can be taken to improve quality physical education and expand opportunities for physical activity during the school day, in local communities and neighborhoods, and in outdoor activities and other recreational settings?

It is important that youth are encouraged to engage in physical activities that are appropriate for their age, enjoyable, and offer variety. If these criteria are not met it will lower the success rate of any program. A nutritious diet that derives 45-65 percent of daily calories from carbohydrates (such as grains) as recommended by the Dietary Guidelines, fuels the body to meet desired daily exercise levels and movement.

One of the major drawbacks for inner city children to play outside and exercise out of school is the safety factor. Schools must find an affordable way to stay open in the evenings and on weekends, even if it means volunteer supervision by qualified parents. Or schools must work with their local YMCA to provide free membership to children who qualify for free meals.

A major element that has been ignored by the nutrition community previously is the physical activity portion of the equation. While exercise is not as effective in reducing weight, it is very effective in preventing weight gain and in preventing re-gaining by those who have lost weight.

Schools and neighborhoods need to find new, creative ways to attract children to physical activity after school, on weekends and during vacations through games, competitions and other active **fun** events. We also suggest that physical education classes be mandatory for all schools and all grades.

Another easy suggestion is for schools to have recess before lunch. A study by Gettlinger et. al ⁽⁸⁾ showed a reduction in plate waste from 35% to 24% just by having recess first. This and other studies have also shown that children may perform better in school if they have recess before lunch.

One of the best and most successful interventions has been the Healthy Schools Partnership (HSP) in Kansas City. This project was developed through a partnership between the American Dietetic Association Foundation (ADA), the American Council for Fitness and Nutrition (ACFN) and PE4life. The purpose of the Healthy Schools Partnership is to develop viable long-term solutions to the youth obesity epidemic through the integration of Registered Dietitian (RD) coaches in PE class and other non-traditional school settings. The nutrition education component was created to give students the knowledge they need to make sound dietary choices and reduce their likelihood of becoming obese or overweight.

The first year of the 7- week intervention involved almost a thousand students in grades five through nine and showed significant improvement in both nutrition knowledge and eating behaviors. Every grade and every school showed an increase in nutrition knowledge scores—by as much as 30%. The second year was equally successful and the administrators of the program made several recommendations for future adjustments to make it even more successful.

The HSP should serve as a model for the Taskforce to use when developing ways to increase nutrition knowledge through physical education classes and non-traditional settings. For more information on the program, we have attached two documents.

We sincerely appreciate your consideration of these comments. We look forward to working with the Taskforce to provide information that will assist in developing balanced recommendations based on sound science. If you have any questions, please don't hesitate to contact us.

Sincerely,

American Bakers Association, Robb MacKie, President/CEO
Grain Foods Foundation, Judi Adams, MS, RD, President/CEO
National Association of Wheat Growers, Dana Peterson, CEO
National Pasta Association, Carol Freysinger, Executive Director
North American Millers Association, Betsy Faga, President
USA Rice Federation, Elizabeth C. Ward, President/CEO
Wheat Foods Council, Lynn Holly, Interim Director

American Bakers Association (ABA) The American Bakers Association (ABA) is the Washington D.C.-based voice of the wholesale baking industry. Since 1897, ABA has represented the interests of bakers before the U.S. Congress, federal agencies, state legislatures & international regulatory authorities. ABA advocates on behalf of over 200 companies – both baking companies and their suppliers. The baking industry generates more than \$70 billion in economic activity annually and employs close to half a million highly skilled people. RMackie@americanbakers.org

Grain Foods Foundation (GFF), a joint venture of members of the milling, baking and allied industries formed in 2004, is dedicated to advancing the public's understanding of the beneficial role grain-based foods play in the human diet. Directed by a board of trustees, funding for the Foundation is provided through voluntary donations from private grain-based food companies and is supplemented by industry associations. Judi.Adams@grainsfoundation.org

National Association of Wheat Growers (NAWG) is a federation of 21 state wheat grower associations that works to represent the needs and interests of wheat producers before Congress and federal agencies. Based in Washington, D.C., NAWG is grower-governed and grower-funded, and works in areas as diverse as federal farm policy, trade, environmental regulation, research and climate change. dpeterson@wheatworld.org

National Pasta Association (NPA) Founded in 1904, NPA is an organization of pasta manufacturers, millers and suppliers to the US pasta industry which serves as a cohesive industry advocate, a promoter of pasta and a center of knowledge for its members. CFreysinger@kellencompany.com

North American Millers' Association (NAMA) is the trade association representing 48 companies that operate 170 wheat, rye, oat and corn mills in 38 states and Canada. Their collective production capacity exceeds 160 million pounds of product each day, more than 95 percent of the total industry production. BFaga@Namamillers.org

USA Rice Federation is the global advocate for all segments of the U.S. rice industry with a mission to promote and protect the interests of producers, millers, merchants and allied businesses. Over 20 billion pounds of long, medium, and short grain, and organic and specialty rices are grown and harvested each

year by farmers in Arkansas, California, Louisiana, Texas, Mississippi and Missouri.
BWard@USARice.com

Wheat Foods Council (WFC) is a nonprofit organization formed in 1972 to help increase public awareness of grains, both whole and enriched, complex carbohydrates, and fiber as essential components of a healthful diet. The Council is supported voluntarily by wheat producers, millers, bakers, and related industries. LHolly@wheatfoods.org

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