

April 29, 2010

Carole Davis, Co-Executive Secretary  
2010 Dietary Guidelines Advisory Committee  
Center for Nutrition Policy and Promotion  
United States Department of Agriculture  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

Dear Chairman Van Horn and Advisory Committee Members:

On behalf of the partners in the grains industry: **American Bakers Association, American Institute of Baking, Grain Foods Foundation, Grains for Health Foundation, Independent Bakers Association, National Association of Wheat Growers, National Pasta Association, North American Millers' Association, USA Rice Federation and Wheat Foods Council**, we thank you for the opportunity to submit comments regarding the 2010 Dietary Guidelines for Americans. We realize that some members of the committee are highly knowledgeable about all types of grains. However, we would like to clarify and comment on some issues regarding grains that were discussed at the fifth meeting of the DGAC in the form of four recommendations:

**1) Recommendation: The Committee should not support the Nutrient Adequacy Sub-committee's recommendation of replacing two servings of grains (one whole and one enriched) with two servings of starchy vegetables.** The concept behind MyPyramid is to make an easy and simple guide by grouping foods that belong together -- grains and starchy vegetables do not.

We recognize nutritionists' frustrations that consumers are eating too many energy-dense forms of potatoes, but this does not appear to be a solution for increasing more colorful vegetables and/or whole grains in the diet.

While their modeling showed losses of Dietary Folate Equivalents, B12, selenium, thiamine, niacin and iron and increases in vitamin A, D and K, it did not account for the overall contribution of whole grains. We know that whole grains, including their phytonutrients, are more than just a "sum of their parts."

We also suspect that fried starchy vegetables would be substituted for grains, increasing total calories and fat significantly. At a time when Americans should be lowering their daily calorie intake, this does not make good nutritional sense.

While this model may present an alternative pattern for those who want to use diabetic exchanges, it would be very challenging to implement for the general population. In addition, diabetics who use exchanges already know how to regulate their carbohydrate intake.

**2) Recommendation: The Committee should use the term “enriched” grains when referencing grains that are not defined as whole grains.** The term “enriched” is more accurate than the term “refined” or milled grains because approximately 95% of all refined/milled grains are enriched with niacin, thiamine, riboflavin and iron in equal amounts found in whole grains and folic acid is fortified in twice the amount found in whole grain products.

The FDA Standards of Identity (1) recognizes the use of the term “enriched” for milled grains to which these nutrients have been added. “Enriched” is a principal display panel product descriptor and ingredient labeling term consumers are familiar with and look for when purchasing healthy grains; “refined” is not a principle display panel term. Continuation of the use of “refined” is confusing and inaccurate for both the consumer and the nutrition community. Most importantly, the term "refined" is interpreted negatively by both the consumer and the media when, in fact, both whole grains and enriched grains have a place in a healthy, balanced diet.

**3) Recommendation: The Dietary Guidelines Advisory Committee’s sodium recommendation should consider and support a voluntary, gradual and incremental approach to the reduction of sodium in foods that is mindful of functional properties and consumer preferences.**

The important contributions of grain-based foods in the American diet is widely recognized which is why they are the largest food group. Salt and sodium play a key functional role in these foods and the grain sector has given considerable thought to ways to increase sodium reductions. Although research and technology on alternative ingredients and technology has expanded, current options are limited and substantial research is required to define physiological mechanisms related to salt, sodium and taste.

Salt is a critical ingredient in the production of bread. It enhances flavor, crust color and crumb structure; prevents excess yeast action and inhibits acid producing bacteria. It is also a vital ingredient in maintaining the flavor of bread. While we recognize that bread is one of the major contributors of sodium because of the quantity consumed, as an individual serving, it is not a high sodium product. Bakers have already pro-actively reduced the amount of sodium in bread in recent years, with USDA data confirming that the average sodium level in a slice of bread has dropped from 254 mg to 180 mg since 1963. Both cereals and rice mixes have also decreased their sodium content in recent years and many are working to decrease further including participating in the National Salt Reduction Initiative.

Also, retraining the palate through gradual reductions over a period of time is likely to be most effective since taste, including consumer perception about taste, is still the number one driver for food purchase.

We believe that the gradual and incremental approach, along with educational efforts from government, industry, health professionals and other stakeholders to encourage a wide-spread change in the dietary intake patterns will effectively help consumers achieve the reduced sodium goals.

**4) Recommendation: Continue use of the current guideline: “Consume half your grains from whole.”** Science shows that three servings of whole grains a day can reduce the risk of many chronic

diseases and may help in weight management. Thus, daily intake of at least three servings of whole grain is recommended.

The Committee discussed the ramifications if ONLY whole grains were recommended and no enriched grains. The major loss would, of course, be folic acid. Some DGAC members suggested consumers could get enough folate by eating leafy greens or folic acid by consuming fortified orange juice. While we encourage people to eat more leafy greens, in reality, we are a distance from that ever happening and the nutrition community is actually encouraging people to consume less juice because of the sugar content.

As you know, in 1998 the FDA mandated that folic acid be added to enriched grains in twice the amount contained in whole grains. Since that time, CDC estimates that **1,000 babies per year (26 percent fewer babies with NTDs)** (2) have been saved from disabling and potentially fatal neural tube birth defects. The March of Dimes encourages women of child-bearing age to eat grain products enriched with folic acid because the majority of them do not take supplements, despite nearly 17 years of advice from the U.S. Public Health Service and international health organizations to do so (3).

In the January 9, 2009 issue of *Morbidity and Mortality Weekly* (4), CDC also supports consumption of enriched grains: “Health-care professionals should encourage women who can become pregnant to consume folic acid daily through a vitamin supplement or enriched foods.” According to NHANES 1999-2000, enriched and fortified grains are the largest source of folic acid in the American diet. In fact, bread, rolls and crackers supply 15.6 percent of daily folate, vegetables provide 12.6 percent, rice and pasta dishes provide 12.4 percent and breakfast cereals 12.1 percent (5).

In addition, synthetic folic acid found in fortified foods is more bioavailable than its natural counterpart found in whole grains, fruits and vegetables. Naturally occurring folates in foods are highly unstable and easily degraded in storage and during cooking. Folates are poorly absorbed at 50% the rate of a folic acid supplement taken on an empty stomach, which is considered to be nearly 100% absorbable (6). FDA has authorized a health claim that highlights this distinction.

Furthermore, the U.S. has a growing Hispanic population and it is even more important that this group of women consume adequate amounts of folic acid-rich foods as they are 1.5 to 3 times more likely to have a baby with a neural tube birth defect (7).

In addition to reducing the incidence of neural tube birth defects, iron-deficiency-anemia and *perhaps* lowering the incidence of death from heart disease and strokes, enriched and fortified grains have virtually eliminated beriberi and pellagra in the U.S.

While many nutritionists would prefer that whole grain bread, pasta, rice, crackers, pretzels, etc. be fortified with folic acid as are enriched grains, current FDA Standards of Identity prevent this and only whole grain cereals can be fortified with folic acid. The reasoning behind this is that FDA is worried about over-fortification in certain populations.

In summary, there are many valid reasons to continue use of the current guideline. But the most compelling reason lies in harmonization of federal nutrition policy and recommendations and not undermining a highly successful public health policy that has demonstrated its success through empirical

data – and the very human face of healthier babies. Since 1998, when grain products manufacturers complied with FDA, our companies have invested extensive resources in education efforts regarding the importance of folic acid for mothers-to-be by partnering with the March of Dimes and the Folic Acid Awareness Council.

Having FDA and CDC recommending one thing, and USDA and HHS recommending another would create endless and unnecessary confusion for consumers. If there were two competing policies, it would undermine grain products companies' enthusiastic compliance and educational efforts with the public health initiative.

Thank you for the opportunity to comment on recommendations for the 2010 Dietary Guidelines for Americans. If you have any questions, please do not hesitate to contact any of the undersigned organizations.

Sincerely,

**American Bakers Association**, Robb MacKie, President/CEO  
**American Institute of Baking**, James Munyon, President  
**Grain Foods Foundation**, Judi Adams, MS, RD, President/CEO  
**Grains for Health Foundation**, Len Marquart, President  
**Independent Bakers Association (IBA)**, Nick Pyle, President  
**National Association of Wheat Growers**, Dana Peterson, CEO  
**National Pasta Association**, Carol Freysinger, Executive Director  
**North American Millers Association**, Mary Waters, 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](mailto:RMackie@americanbakers.org)

**American Institute of Baking International (AIB)** is a corporation founded by the North American wholesale and retail baking industries in 1919 as a technology transfer center for bakers and food processors. The original mission of the organization was to "put science to work for the baker," which is still central to all of the programs, products, and services provided by AIB to baking and general food production industries worldwide. [JMunyon@AIBonline.org](mailto:JMunyon@AIBonline.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](mailto:Judi.Adams@grainsfoundation.org)

**Grains for Health Foundation** (GFH) was founded in 2009 to increase the availability of affordable grain-based foods with health benefits to improve public health. Grains for Health forges partnerships with food and health leaders to develop evidence-based strategies that facilitate the development, delivery, and consumption of grain-based foods that promote public health, lower the incidence of diet-related, chronic disease, and curb health care costs. [LMarquart@umn.edu](mailto:LMarquart@umn.edu)

**Independent Bakers Association** (IBA) The Independent Bakers Association is a Washington, D.C. based national trade association of over 400 mostly family owned wholesale bakeries and allied industry trades. The Association was founded in 1968 to protect the interests of independent wholesale bakers. [NPyle@attglobal.net](mailto:NPyle@attglobal.net)

**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](mailto:dpeterson@wheatworld.org)

**National Pasta Association** (NPA) was founded in 1904 and 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](mailto: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. [MWaters@Namamillers.org](mailto:MWaters@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](mailto: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](mailto:LHolly@wheatfoods.org)

#### References:

- 1) FDA Standards of Identity PART 137 -- CEREAL FLOURS AND RELATED PRODUCTS Subpart B-- Requirements for Specific Standardized Cereal Flours and Related Products
- 2) CDC. Morbidity & Mortality Weekly Report. May 7, 2004. 53 (17): 363-365.
- 3) Botto LD, Lisi A, Robert-Gnansia E, Erickson JD, Vollset SE, Mastroiacovo P, Botting B, Cocchi G, de Vigan C, de Walle H, Feijoo M, Igens LM, McDonnell B, Scarano G, Siffel C, Metneki J, Stoll C, Smithells R and

Goujard J. International retrospective cohort study of neural tube defects in relation to folic acid recommendations: are the recommendations working? *BMJ* 2005; 330:571

4) CDC. *Morbidity & Mortality Weekly Report*. Jan. 9 2009. 57 (53): 1409.

5) Dietrich M., Brown CJ, Block G. The effect of folate fortification of cereal-grain products on blood folate status and dietary folate sources among adult non-supplement users in the United States. 2005. *Journal of the American College of Nutrition*, Vol. 24, No. 4, 266–274.

6) Institute of Medicine. (1998) Dietary reference intakes for thiamin, riboflavin, niacin, vitamin B6, folate, vitamin B12, pantothenic acid, biotin and choline. Last accessed 12/18/08 from <http://books.nap.edu/openbook.php?isbn=0309065542&page=196#pagetop>

7) [www.CDC.gov/omh/populations/HL/HHP/folic.htm](http://www.CDC.gov/omh/populations/HL/HHP/folic.htm)