



A consortium of industry, scientists, chefs and Oldways to increase consumption of whole grains to provide better health for all consumers

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Carol Davis
Co-Executive Secretary of the Dietary Guidelines Advisory Committee
Center for Nutrition Policy and Promotion, USDA
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Re: 2010 Dietary Guidelines Advisory Committee solicitation of written comments

To the Dietary Guidelines Advisory Committee:

The Whole Grains Council, an organization associated with 501(c)3 educational non-profit Oldways, is dedicated to increasing consumption of whole grains for better health and to helping consumers easily find whole grains and understand their benefits. We appreciate the opportunity to provide additional written comments to the Dietary Guidelines Advisory Committee, as a follow-up to our earlier comments submitted on April 16, 2009.

Since the 2005 Dietary Guidelines Advisory Committee finished its work, substantial and extensive additional research has been published linking whole grains with good health. The Whole Grains Council compiled a review of this recent research, and sent it to Dr. Brian Wansink and Dr. Robert Post on January 15, 2009 to support the work of the 2010 Dietary Guidelines Advisory Committee.¹

The research highlighted in that summary report and in other studies prompted the FDA, in early 2006, to say, "We agree with you that the health benefits of whole grains are based on more than their fiber content."² Now, more than four years later, it's clearer than ever that many different nutrients and components, working synergistically, are likely responsible for the documented strong health benefits of whole grains.

In this way, whole grains are similar to fruits and vegetables. While all three are important sources of fiber in the diet, it would seem shortsighted to counsel eating fruits and vegetables solely for their fiber, or to claim there's no need to eat actual fruits and vegetables if we can simply ingest some single component found in produce.

In this context, we're extremely perplexed that a report published in 2008 by the Life Science Research Office (LSRO), entitled *Whole Grain Intake and Cardiovascular Disease and Whole Grain Intake and Diabetes: A Review*³ looks at the same extensive body of whole grain research and comes to the surprising conclusion that perhaps only *fiber* is important after all. It comes to this conclusion by (among other questionable methodologies) discounting all studies that do not explicitly detail the grains in question are whole. For example, a study on oats and buckwheat was set aside because the authors did not explicitly label them as "whole grain oats" and "whole grain buckwheat" – even though these two grains are seldom, if ever, eaten in refined form.

We are relieved that the Dietary Guidelines Advisory Committee has resolved to use NEL – the Nutrition Evidence Library – to make its recommendations for the new Dietary Guidelines, rather than be swayed by reports initiated by and funded by single manufacturers.

Since 2005, when the latest Dietary Guidelines introduced a strong recommendation for whole grains, scientists in other countries, looking at the same body of worldwide research, have concluded that an *even stronger* recommendation, for *even higher* whole grain consumption, is fully justified.

In 2008, the Danish National Food Institute (DTU) issued new guidelines for whole grain consumption, saying, “It is concluded that the scientific documentation is sufficient to recommend a wholegrain intake in Denmark of 4 portions per day, equal to [a] minimum [of] 75g wholegrain/10 MJ...”⁴

In late 2009, Sweden’s Livsmedelsverket came out with a similar recommendation, calling for Swedes to consume 75g of whole grain per 2400 calories, a level they generalize to be about 70g for most women and about 90g for most men.⁵

The Dietary Guidelines Advisory Committee, at its most recent public meeting (November 4th and 5th, 2009) stressed the importance of focusing on the overall food pattern instead of individual nutrients. We applaud the Committee for taking this approach instead of turning back the clock to a time when we were unaware of the important synergies in the whole foods and whole dietary patterns human bodies have evolved to depend upon.

Americans, spurred on by the 2005 Dietary Guidelines’ call to “make at least half your grains whole” increased their consumption of whole grains by twenty percent from 2005 to 2008.⁶ With continued strong support in the 2010 Dietary Guidelines for Americans, whole grains can gather even more momentum, on their way to becoming the new norm for grain foods.

Sincerely yours,

Michael Bittel
Chairman, the Whole Grains Council

K. Dun Gifford
Secretary-Treasurer, the Whole Grains Council; President, Oldways

Cynthia W. Harriman
Director of Food & Nutrition Strategies, the Whole Grains Council and Oldways

¹ Summary of Recent Whole Grain Health Research, from Oldways and the Whole Grains Council, January 2009. This compilation and other research compilations from The Bell Institute and from Joanne Slavin can be downloaded at <http://wholegrainscouncil.org/whole-grains-101/what-are-the-health-benefits>

² January 24, 2006 letter from Felicia Billingsley, FDA, to Judi Adams, Grain Foods Foundation.

³ Life Sciences Research Office report *Whole Grain Intake and Cardiovascular Disease and Whole Grain Intake and Diabetes: A Review* (Bethesda, MD: LSRO, 2008).

⁴ Fuld af Korn, November 2008 report (in Danish with English summary on pages 11-14), available at http://www.food.dtu.dk/Files/Filer/Ernæring/Kostanbefalinger/Fuldkorn_2._udgave.pdf

⁵ Full recommendations in Swedish at <http://www.slv.se/sv/grupp3/Nyheter-och-press/Nyheter1/Nytt-rad-om-fullkornersatter-brodrad/>

⁶ Data from NPD Group’s National Eating Trends / Eating in America Report, February 2008 edition.