

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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To the 2010 Dietary Guidelines Advisory Committee:

We are writing today to urge the 2010 Dietary Guidelines Advisory Committee to maintain a strong recommendation for whole grains, and to make two enhancements, as detailed below.

The Whole Grains Council, a 501(c)3 educational non-profit dedicated to increasing consumption of whole grains for better health, supports the strong recommendation of the 2005 Dietary Guidelines for Americans, which calls for all of us to make at least half of our grains whole.

New data just released by the NPD Group's National Eating Trends¹ study show that Americans have begun to heed the call to enjoy more whole grains, and have increased whole grain consumption by 20% from 2005 to 2008. That sounds impressive – until we remember that the 2005 Dietary Guidelines Advisory Committee Report calculated that we would need to increase whole grain consumption 217 to 544% to make at least half our grains whole.² This small 20% increase has only brought us to the point where 11% of our grains are whole, according to NPD Group's data.

Recommendation #1: Support Mixed-Grain Foods

What accounts for the large gap between whole grain recommendations and actual consumption? One reason could be the “all or nothing” approach of the 2005 Dietary Guidelines, in which all guidance and educational materials describe just two types of grain foods: those that are 100% whole grain (“all”), and those that are made entirely of refined or enriched grain (“nothing”).

Just as consumers offered the “all or nothing” choices of whole milk and skim milk would be unlikely to take the leap and change their habits, they are likely to behave similarly with whole grains. Consumers wanting to drink healthier milk don't drink whole milk some of the time and skim milk the rest of the time – they usually drink 2% milk or 1% milk all the time, an approach supported in the Dietary Guidelines and on MyPyramid.gov.³

Since 2005 the market has provided a wealth of products made with a mix of whole and enriched grains – the “whole grain” equivalent of 2% milk and 1% milk – to help consumers' palates start the transition to the fuller, nuttier taste of whole grains.

In fact, the 2005 Dietary Guidelines Advisory Committee specifically noted the importance of “mixed” whole grain foods, when they stated,

“In practice, when a person selects a mixed grain bread or cereal, he gets *both* a whole grain portion and an enriched grain portion. Because of the desirable baking properties of enriched flour, these mixed grain products are often appealing to consumers who do not choose to eat 100 percent whole grains. ... These foods make up about 70 percent of all the whole grains consumed by Americans, according to the CSFII 1994-1996 food consumption survey. ... While many are not whole grain, they provide some whole grains in the diets of those who might not otherwise select any.”

2005 Dietary Guidelines Advisory Committee Report, p. 16-17

Despite this discussion in the Advisory Committee Report, the actual 2005 Dietary Guidelines for Americans offer no way for Americans to gauge appropriate levels of whole grain consumption if they choose to get their whole grains from mixed grain products.

The Whole Grains Council strongly urges that this unfinished business be addressed and that the 2010 Dietary Guidelines for Americans prescribe how to count mixed whole grain products toward the daily goal of three or more servings of whole grains.

Specifically, we recommend that the 2010 Dietary Guidelines clearly define a MyPyramid serving of whole grains as follows:

For 100% whole grain foods

one half cup cooked pasta, rice or other grains; one half cup cooked cereal; one cup ready-to-eat cereal; one slice bread; one small (one ounce) bagel or muffin

For mixed grain foods

16 grams⁴ or more of whole grain ingredients per labeled serving, with a goal of 48 grams (16x3) or more per day⁵

The definitions for 100% whole grain foods would carry forward unchanged from the 2005 Dietary Guidelines, with the addition of language that makes clear that these measures apply only to 100% whole grain foods. Additional language to promote mixed-grain foods would be added as appropriate.

Recommendation #2: Replace the term “Ounce-Equivalents”

We further recommend that the 2010 Dietary Guidelines drop the confusing term “ounce equivalents” in referring to grain foods. We suggest a more neutral term such as “units.” In our wide-ranging experience working with both consumers and health professionals, the term “ounce equivalents” is a major barrier to understanding the whole grain message. It has even led some highly-placed health professionals to argue that the 2005 Dietary Guidelines recommend consuming 85 grams or more of whole grain ingredients daily (28.35g x 3).

In conclusion, the Whole Grains Council and its parent organization, Oldways, recommend that the 2010 Dietary Guidelines pave the way for breaking through the whole grain consumption barrier by:



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- clearly defining 16g of whole grain ingredients as a mypyramid serving of mixed-grain foods, and
- dropping the confusing term “ounce-equivalents” in relation to whole grains.

The 2005 Guidelines marked a major step forward for whole grains. In the 2010 Dietary Guidelines, that initial important step can be lengthened to a giant stride to help all Americans make (at least!) half their grains whole.

Sincerely yours,

Michael Bittel
Chairman, the Whole Grains Council

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Secretary-Treasurer, the Whole Grains Council; President, Oldways

Cynthia Harriman
Director of Food & Nutrition Strategies, The Whole Grains Council and Oldways

¹ NPD Group National Eating Trends / Eating in America Annual Survey, February 2008 edition.

² 2005 Dietary Guidelines Advisory Committee Report, Table G2-9, August 2004

³ MyPyramid.gov, for instance, advises that “most milk group choices should be fat-free or low-fat.” The equivalent of this for grains would be to say, “Most grain group choices should be made totally or partially with whole grain.”

⁴ 16g is the amount designated by USDA as a minimum grain serving. This amount is referenced in many USDA documents, including “The Healthy Eating Index, 1999-2000” page 15 at www.cnpp.usda.gov/publications/HEI/HEI99-00report.pdf and FSIS Statement of Interim Policy Guidance on Use of the USDA MyPyramid Reference on Meat and Poultry Labeling and Whole Grain Claims at www.fsis.usda.gov/OPPDE/larc/Claims/Food_Guide_MYPyramid_Policy.pdf, page 3 We are aware that the kitchen-friendly amounts stipulated in the 2005 Dietary Guidelines actually range from about 16g to about 28g in whole grain content, but we suggest the use of a single value to communicate clearly with consumers.

⁵ The Dietary Guidelines Advisory Committee may be interested to learn that the only other country known to have a clear recommendation for whole grain consumption is Denmark, which recommends 75g a day for most adults. (see www.fuldkorn.dk/index.php?pageid=15)



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