



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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United Sorghum Checkoff Program
Anne Banville
USA Rice Federation

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Carole Davis
CNPP / USDA
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Re: Comments on the Report of the
Dietary Guidelines Advisory Committee 2010

The Whole Grains Council is a non-profit consumer-advocacy group founded and managed by 501-c-3 educational organization Oldways, and working with scientists, chefs and industry to promote increased consumption of whole grains for better health.

We appreciate the DGAC Report's affirmation of the evidence supporting the relationship of whole grain intake in

- protecting against cardiovascular disease
- reducing incidence of type 2 diabetes and
- being associated with lower body weight

We also appreciate that, throughout several of its sections, the DGAC Report repeatedly reinforces the importance, in a healthy diet, of nutrient-dense foods in general and whole grains in particular, with phrases such as "Deliberate efforts are required to replace refined grains with whole grains..." and "All vegetables, fruit, whole grains, fish, eggs, and nuts prepared without added solid fats or sugars are considered nutrient-dense."

We are writing today with two suggestions to make the Report and the subsequent guidelines even stronger and clearer in their recommendation for whole grains by:

- 1) Clearly including *all* whole grains in its recommendations.
- 2) Clarifying consumers' understanding of whole grain foods by endorsing the IOM's definition of a whole grain-rich food.

Importance of Promoting *All* Whole Grains

We believe it is important to promote *all* whole grains, regardless of their fiber content – just as fruits and vegetables are promoted without regard to their fiber content. While we applaud the strength and clarity of the DGAC Report's important whole grain messages, we are concerned that consumers may be confused by the frequent use of the term "fiber-rich whole grains."

If it is made clear that this term is meant simply to remind Americans that all whole grains are richer in fiber than their refined/enriched counterparts, then the phrase could indeed be useful. On the other hand, if the term is meant to suggest that some whole grains are preferable to others, it has great potential to confuse consumers and to detract from this otherwise-valuable message.



CHANGING THE WAY PEOPLE EAT

266 Beacon St., Boston, MA 02116
Tel: 617.421.5500
www.wholegrainscouncil.org

As you are aware, FDA requires foods to contain 20 percent of the Daily Value of a nutrient in order to claim the food as being “an excellent source of” or “rich in” that nutrient. Thus, a food must contain at least 5 grams of fiber per serving to be rich in fiber. The table below shows several common whole grain foods, and their fiber content per serving (both RACC and Dietary Guidelines / MyPyramid serving sizes).

SR-22 #	Food	Serving size	Fiber
18075	Whole Wheat Bread	FDA RACC / 50 g DG Slice / 28 g	3.4 g 1.9 g
08013	Toasted O's cereal	FDA RACC / 30g DG 1 ounce / 28 g	3.0 g 2.8 g
08147	Shredded wheat cereal	FDA RACC 2 biscuits / 46 g DG 1 ounce / 28 g	5.5 g 3.3 g
20013	Bulgur, cooked	FDA RACC / 140 g DG ½ cup / 91 g	6.3 g 4.1 g
20037	Brown rice, cooked	FDA RACC / 140 g DG ½ cup / 97.5 g	2.6 g 1.8 g
20004	Barley, hulled, dry	FDA RACC / 45 g DG 1 oz dry / 28 g	7.8 g 4.9 g
08121	Oatmeal, cooked	FDA RACC / 1 cup 234 g DG ½ cup / 117 g	4.0 g 2.0 g

Using Dietary Guidelines / MyPyramid servings, none of the foods in the table can be considered “fiber rich” – except perhaps barley; using (generally larger) FDA / NLEA RACC (Reference Amount Customarily Consumed) amounts, only barley, bulgur and shredded wheat would qualify as “fiber rich” while many of the most commonly-eaten whole grains would not.

We would hope that it is the intent of the DGAC to clearly recommend increased consumption of *all* whole grain foods in their nutrient-dense forms, but the emphasis on the ambiguous and potentially misleading term “fiber-rich” may in fact discourage consumption of popular whole grain foods such as whole wheat bread, oatmeal, most ready-to-eat (RTE) whole grain breakfast cereals, and brown rice.

It is widely recognized that whole grains contribute more to the diet and to health than simply fiber. Just as certain vegetables are not singled out solely on their fiber contribution or lack thereof, we would encourage that *all* whole grains also continue to be encouraged for their overall contribution to health, and for the range of healthy micronutrients attained by eating a variety of different whole grains.

Defining Whole Grain Content and Whole Grain Foods

In discussing the relationship of whole grains and health, the DGAC Report states that “The lack of standards for whole grain foods and measuring whole grain content of foods also make any recommendations difficult to implement.” (D5-11)

We suggest that a good solution for this problem has been proposed in the IOM report *School Meals: Building Blocks for Healthy Children*, which the DGAC Report endorses earlier (B3-6) in making a call to “Improve foods sold and served in schools ... so that they meet the recommendations of the IOM report on school meals (IOM, 2009)...”

This IOM school meals report calls for schools to offer “whole grain-rich” foods, defined as those containing at least 14.75 grams of grains overall, of which 8 grams or more are whole grains. ¹

The clarity of government nutrition messages, and the resulting health of Americans, benefit from consistent standards and definitions between different government entities. Therefore, the Whole Grains Council urges the 2010 Dietary Guidelines to endorse and reinforce the IOM School Meals Report’s definition of Whole Grain Rich foods.

Thank you for all the effort that went into creating this valuable DGAC Report and for the opportunity to make comments.

Sincerely,



Sara Baer-Sinnott
President, Oldways
Secretary-Treasurer, The Whole Grains Council

¹ Alternatively, foods can qualify as whole grain-rich if whole grains make up at least 51% of the total weight, or the first ingredient is whole grain, but the report states clearly that “...the goal of the criterion is to ensure that foods qualify as whole grain-rich if they contain at least 8 g of whole grains...” *School Meals: Building Blocks for Healthy Children*, p. 124-125