

August 11, 2020

Kristin Koegel

USDA Food and Nutrition Service, Center for Nutrition Policy and Promotion

Re: Comments from the Grain Chain to the Scientific Report of the 2020 Dietary Guidelines Advisory Committee; Docket FNS-2020-0015

Filed electronically at www.regulations.gov

Dear Ms. Koegel:

The organizations comprising the Grain Chain, a grains industry coalition from farm to table, appreciate the opportunity to provide additional comments to the USDA and HHS as you develop the *2020 Dietary Guidelines for Americans* (DGAs). This document supports and adds to our evidence-centered comments, filed in July 2019 and January 2020, and provides thoughtful considerations that we strongly encourage you to incorporate as you craft final recommendations and plan consumer education.

Our Key Priorities for the 2020 Dietary Guidelines for Americans:

1. Correct the negative representation in the Dietary Guidelines Advisory Committee (DGAC) Scientific Report regarding enriched refined grains, as there is strong evidence to support and encourage consumption at all life stages.
2. Reinforce the balance of both whole and enriched grains as foundational nutrient contributors across dietary patterns.
3. Strengthen practical and culturally appropriate recommendations and education regarding the essential role of the nutrients and food components provided by enriched grain foods and their impact on improving diet quality.
4. Amplify the DGAC report's recognition of whole grains as one of three food groups that are "fundamental constituents of a healthy dietary pattern" to further increase whole grain consumption at all life stages.
5. Leverage Grain Chain leadership/partnership opportunity with USDA/HHS, other government agencies and academia to fill in research gaps and standardize data collection methods regarding enriched grain foods, flours, and ingredients.

Grains are Foundational for America's Plate

Enriched and whole grains provide significant nutrition value in the American diet. We celebrate the recognition in the DGAC Scientific Report suggesting whole grains are "one of the three food groups that are fundamental constituents of a healthy dietary pattern." The recommendation to "consume half of your grains from whole grain sources" and the remainder from enriched, is a foundational piece of the DGAs.

Yet, we were extremely concerned to see consistent language throughout the DGAC's report linking "refined grains" with poor dietary patterns and health

outcomes. This is particularly troubling since scientific evidence clearly and unequivocally illustrates the key roles of grains – both enriched and whole – in healthy dietary patterns and their significant contributions to diet quality. In fact, refined grain consumption up to 6–7 servings per day was not associated with higher risk of coronary heart disease, Type 2 diabetes, hypertension, or all-cause mortality.¹ Moreover, total grain intake was not associated with risk of CVD, CHD, stroke, or cancer, but was associated with lower risk of all-cause mortality.¹

Given these concerns, the Grain Chain strongly urges the agencies to correct the language regarding the role of enriched grains, the “other half” of the grain recommendation, before developing final guidelines. We believe there is a significant opportunity to provide clarity and decrease confusion resulting from consolidating all non-whole grain foods into the catch-all category “refined grains.” The umbrella term of “refined grains” negates the positive nutrition contributions enriched and partially whole grain foods have on overall diet quality.¹⁻⁴ Correcting this language will help avoid further consumer confusion and counterbalance the misrepresentation enriched grains have experienced to date. It is also an appropriate opportunity to highlight enriched grains’ positive impact on health outcomes.

The Importance of Enriched Grains in Various Life Stages

In our previous comments, we cited findings from numerous well-designed research studies attesting to the significant, positive nutrition and wellness contributions of enriched grains. While we know that dietary patterns are a largely helpful motif for discussing nutrition, in this case, the consistent negative language regarding refined grains villainizes foods that are nutritious, economical, and appeal broadly across age, socioeconomic, and cultural tastes. The enrichment and fortification of grain foods have made lasting contributions to public health. Of note, enrichment resulted in the eradication of such diet-related diseases as pellagra and beriberi, while fortification with folic acid is credited with significantly reducing the prevalence of neural tube defects (by 35% since 1998). Enriched grain foods also provide short-fall nutrients (iron, fiber) that contribute to positive health outcomes in various life stages.

Federal nutrition programs such as the School Breakfast Program and National School Lunch Programs, Child and Adult Care Food Program and the Special Supplemental Nutrition Program for Women, Infants and Children include a wide range of nutrient-dense beneficial grain foods. Examples include iron-fortified infant cereal and ready-to-eat cereals fortified with key vitamins and minerals, enriched and fortified whole grain breads, pastas and tortillas, as well as oatmeal and brown rice. These foods are selected for the nutrient contributions provided to at-risk populations and help to improve diet quality. Recent research found that introduction of iron-fortified baby rice cereals was associated with better nutrient intakes and intakes of nutrients that require special attention during early life.⁵ Numerous studies have shown consumption of fortified ready-to-eat cereals increases the intake of nutrients of public health concern and attracts other nutrient-dense food categories

such as dairy and fruit. Of note, 40% of the whole grain intake in the diets of Americans is provided by breakfast cereals and bars.⁶

Fiber continues to be a food component of public health concern in the diets of most Americans. Grain foods are a significant contributor to dietary fiber and almost one-quarter of our dietary fiber comes from enriched grain foods.¹ This data point, coupled with the substantial contributions of the enrichment and fortification of nutrients, should no longer be overlooked when considering the healthful contributions of enriched grain foods to the food supply.

Enriched Grains Provide Value in Dietary Patterns

As plant-based foods, grains play an important role within all the DGA recommended diet patterns. For instance, enriched grain foods often serve as the base for a variety of other foods and food groups improving the overall nutrient delivery, as well as representing a key carrier for cultural foodways: from sandwiches layered with vegetables and protein-packed lean meats, seafood or nut butters, to pasta or rice-based dishes or pizza accompanied by colorful vegetable mixtures and sauces; tortillas filled with beans, cheese and vegetables; even simple combinations like cereal with fruit and milk or peanut butter and banana toast. Enriched grains are a foundation and a great partner on the plate (or bowl) and help to deliver higher diet quality.⁷

In addition, grain foods, both enriched and whole, are affordable, versatile, convenient, and easy to store. These qualities are important when crafting the 2020 DGAs since consumers will be more likely to follow guidelines that are based on familiar cultural foods that appeal to all life stages. The ongoing COVID-19 pandemic is a good illustration of these cultural traditions as consumers' stock up on affordable staple foods like bread, cereal, pasta, rice, grains, and flours. These traditional "comfort" foods help provide key nutrients when families are stressed, and food dollars are stretched. In fact, a national study by the Grain Foods Foundation found that one-third of Americans named bread and pasta as foods that are comforting during a stressful time.⁸

The DGAC found that describing a macronutrient profile alone is not sufficient to evaluate the link of dietary patterns to health promotion or disease prevention. To evaluate macronutrient-based dietary patterns, an understanding of the quality of the included food choices is needed to provide an assessment of health outcomes. An example of this, refuting the myth that carbohydrates/grain foods are "fattening," is research that appeared in a recent *Frontiers in Nutrition* showing pasta eaters had BMIs less than or equal to non-pasta eaters.⁹

Grain Industry Partnership

The grain industry commits to continually advancing innovation efforts to improve the taste, functionality, and value of all grain foods - whole grain, blended, and enriched

refined grain ingredients, flours, and foods. Opportunities to explore new innovations, like tailoring enrichment and fortification profiles¹⁰, could offer better nutrition support for the needs of various life stages. We commit to partnering with the agencies and academia in advancing nutrition research to better understand the essential role of enriched/refined grains on health outcomes. The role of fortified foods, especially in supporting the nutrition of vulnerable populations and pregnant women, should also be more fully investigated, and supported.

In conclusion, the Grain Chain respectfully requests USDA and HHS in crafting the 2020 DGAs to make clear to consumers the value of both enriched and whole grains as fundamental nutrient-dense foods that contribute to healthy dietary patterns. Many cultures depend on grain foods as foundational to their dietary patterns. Both enriched and whole grains are go-to accessible pantry staples that offer key nutrients and food components (iron, folic acid, fiber) as well as value, affordability, convenience, versatility, and taste. Providing more education and understanding about the essential role enriched “refined grains” play in consumers’ diets will help decrease confusion, offer guidance on the selection of the “other half” of the grain recommendation, and provide critical transparency to researchers trying to better understand diet and health outcomes.

The Grain Chain appreciates the opportunity to share this information with the agencies and looks forward to partnering in educating the public. Additionally, the industry will continue to support grain foods innovation and play our part in contributing to closing research gaps. It is our sincere hope that through industry, academia and government collaboration, the “other half” of the grain conversation will be elevated and clearer through a better understanding of the positive and invaluable contributions enriched grains add to diet quality and health across all life stages.

Sincerely,

The Grain Chain:

- ❖ American Bakers Association
- ❖ American Institute of Baking
- ❖ Cereal and Grains Association
- ❖ Grain Foods Foundation
- ❖ Independent Bakers Association
- ❖ National Pasta Association
- ❖ National Association of Wheat Growers
- ❖ North American Millers Association
- ❖ Retail Bakers of America
- ❖ Wheat Foods Council
- ❖ USA Rice Federation

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