

May 16, 2022

Janet M. de Jesus, MS, RD
Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary
Department of Health and Human Services
1101 Wootton Parkway, Suite 420
Rockville, Maryland 20852

RE: Request for Comments on Scientific Questions To Be Examined To Support the Development of the Dietary Guidelines for Americans, 2025-2030 (Docket No. HHS-OASH-2022-0005-0001)

Dear Ms. De Jesus:

The Grain Chain, a grains industry coalition from farm to table, appreciates the opportunity to provide input to the Department of Health and Human Services (HHS) and the U.S. Department of Agriculture (USDA) (“the Agencies”) as you begin work on the 2025-2030 Dietary Guidelines for Americans (DGA). The undersigned members provide the following comments on the proposed scientific questions to be examined as part of the review supporting development of the new guidelines.

Overall

It is imperative for the Agencies to review each proposed question carefully to ensure they are appropriately focused on science- and evidence-based topics where the Dietary Guidelines Advisory Committee (DGAC) will be reviewing new research and making recommendations.

In terms of the Dietary Guidelines themselves, positive messaging resonates better with consumers than negative ones. The Grain Chain is concerned that the tone of the questions may reflect and focus on negative rather than positive approaches to improving nutritional intakes for a broad range of cultures and demographic groups.

It is also important for the Agencies to be more specific in terms of defining terms that will be used in developing the 2025-2030 DGAs. For instance, what definition of the terms “nutrient-dense,” “non-dairy,” “non-meat alternatives,” “ultra-processed,” “processed,” and “minimally processed” will the Agencies be using? In order to answer the proposed DGA questions, these terms must be distinctly defined, and these definitions must be data-driven and evidence-based with clear consensus around the scientific evidence.

These definitions will be critical to the DGAC's focus and interpretation applied to each scientific question.

Additionally, what constitutes inclusion and exclusion criteria for research studies?

The Agencies state that issues surrounding alcoholic beverages and sustainability and the "complex relationship between nutrition and climate change" will be addressed separately from the DGAC process. Can the Agencies provide more specifics about this separate process, how it will work, and what opportunities stakeholders will have to participate and contribute?

In text accompanying the proposed scientific questions, the Agencies state that, "All scientific questions will be reviewed with a health equity lens to ensure that resulting guidance in the *Dietary Guidelines* is relevant to people with diverse racial, ethnic, socioeconomic, and cultural backgrounds." The Grain Chain strongly supports this approach and recommends factors such as food cost, food availability, and food accessibility be specified as part of each scientific question's written framework for emphasis and to more formally incorporate them into the scientific review.

While we believe these factors should be part of every DGA process, they are particularly relevant now when the Administration's key priorities include health equity, eliminating hunger, and nutrition security. These goals are made all the more challenging when the US rate of inflation is at its highest point in decades and the food industry continues to struggle with significant and severe supply chain issues.

Comments on Specific Scientific Question

Question: What is the relationship between consumption of dietary patterns with varying amounts of ultra-processed foods and growth, size, body composition, risk of overweight and obesity, and weight loss and maintenance?

Grain Chain:

How will the Agencies define "ultra-processed?" What is the scientific basis for this definition? Currently, there is no scientifically agreed upon definition for "ultra-processed." And what about the varying degrees of processed foods such as "processed" or "minimally processed?"

Before asking this question, the Agencies should clearly define the following terms: "nutrient-dense," "non-dairy," "non-meat alternatives," "ultra-processed," "processed," and "minimally processed."

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These definitions will be critical to the DGAC's focus and interpretation applied to each scientific question.

What benchmarks will the Agencies and the DGAC use to answer these questions? For instance, will the Agencies use the NOVA food classification system? What other systems are out there?

We strongly believe NOVA is not an appropriate categorization method and the lack of randomized controlled trials to establish a cause-and-effect relation in this area is a significant drawback. Also, evidence from the food science perspective (texture, hardness, sensory perception etc.) signals that the associations of ultra-processed foods (UPFs) with increased energy intake are not about processing per se, but rather the texture of food, which has a significant role in one's eating rate and energy intake.

The Grain Chain notes that the DGA must consider other ways to approach foods with varying degrees of processing, particularly those "processed" foods which have beneficial attributes and improve nutrient content with added dietary fiber, vitamins and minerals, reduce food waste, and increase shelf stability. For example, the act of making bread or pasta, is a time-honored, authentic tradition which has been done for hundreds of years. The end result: grain foods that are a healthy, nutritious, convenient, affordable food staple enjoyed by all age groups.

For grains, whether wheat, rice, corn, or other grains, some form of processing is necessary to make the nutrients available and digestible. In the case of enriched (refined) white bread, and enriched pasta, where nutrients are reduced or lost during processing, the nutrients are replaced as part of the enrichment process in amounts equal to or greater than those in whole grain breads or pastas.

Enrichment and fortification of refined grains have made significant, long-lasting contributions to improve the health of Americans. Of grave concern is that these ground-breaking health achievements are currently at risk as some consumers turn away from grains in response to low-carbohydrate diets. In fact, to meet consumer demands for "clean labels," some food manufacturers consider foregoing enrichment and fortification of grain products, which could result in negative nutrition and public health implications.

Additionally, and unfortunately, the custom of inappropriately categorizing enriched grains as simply "refined" by researchers and others in the nutrition and policy communities has become more accepted and widespread. Enriched grains are a subcategory of refined grains but are the predominant segment (95%) of this category and a healthy addition to the diet.

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Emphasis on Weight Loss/Obesity

We appreciate the Agencies' interest in weight loss and exploring dietary patterns that may contribute to obesity but are concerned about a lack of equivalent emphasis on the other side of the equation – physical activity and the critical need for balance. Obesity does not indicate nutritional adequacy. In fact, it often indicates a nutrient poor diet, particularly when poverty is a factor. There should be a focus on nutritional value and balance, not calories alone. Furthermore, many grain foods can help improve diet quality by encouraging the consumption of healthy low-calorie, high fiber foods and increasing fruit and vegetable intake. Thus, the DGA must consider the quality of the diet as a whole and not just the types of food to be included. The DGAC should also be sensitive to consumers with eating disorders regarding messages about body weight image and calories.

DGAC Nomination Process Comments

While the Agencies have not yet announced the nomination process for the 2025-2030 DGAC, the Grain Chain would like to emphasize the value of selecting DGAC members who are strongly credentialed and have expertise specific to the scientific questions. For instance, given the question regarding dietary patterns and ultra-processed foods, it will be critical to have members on the DGAC who have expertise in food processing/manufacturing for the various food categories being discussed.

The DGAC should also include members who have clinical experience and have worked with clients regarding nutrition and diet to ensure the final DGAs include critical positive messaging to encourage healthy choices.

We appreciate this opportunity to provide comments to the 2025-2030 Dietary Guidelines process. For questions or additional information, please contact Grain Chain Leader Lee Sanders, Senior Vice President for Government Relations and Public Affairs for the American Bakers Association, lsanders@americanbakers.org.

Sincerely,
Undersigned Members of The Grain Chain

American Bakers Association
Cereals and Grains Association
Independent Bakers Association
National Association of Wheat Growers
National Pasta Association
North American Millers Association
Retail Bakers of America
USA Rice Federation
Wheat Foods Council