Administrator Daniel Whitley
Foreign Agricultural Service
U.S. Department of Agriculture
1400 Independence Ave SW
Washington, DC 20250

NORTH AMERICAN MILLERS' ASSOCIATION
The Link Between Grain and Goodness

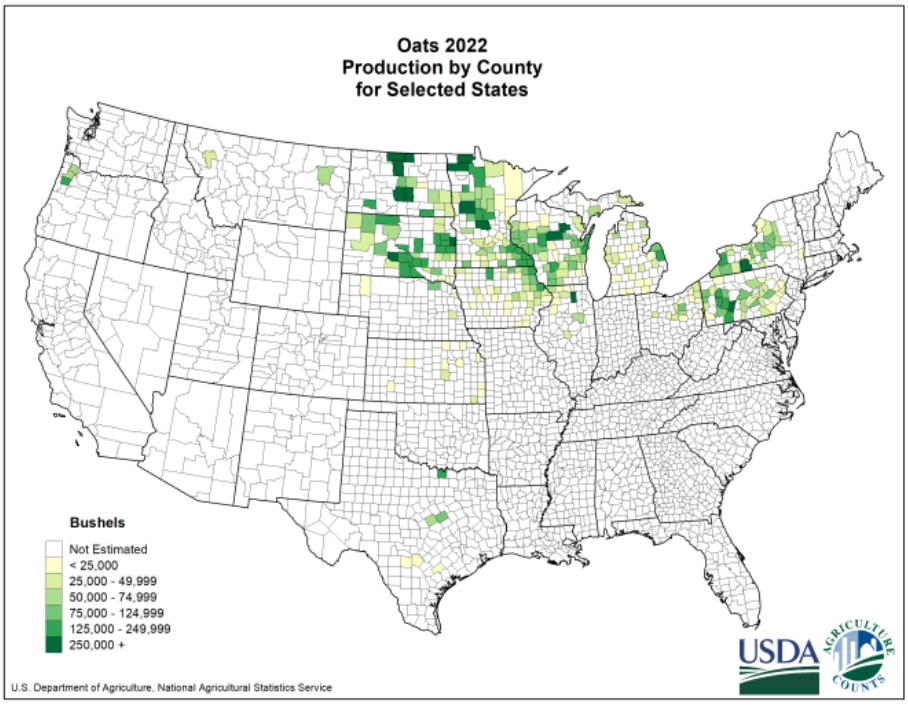
Re: RFI Inviting Input About the $50 Million Non-Traditional Shelf-Stable Commodities Pilot Program

Dear Administrator Whitley:

On behalf of our nation's grain millers, the North American Millers' Association (NAMA) is pleased to submit comments regarding the request for information (RFI), "*Inviting Input About the $50 Million Non-Traditional Shelf-Stable Commodities Pilot Program*" (Federal Register Volume 89, Number 139 (Friday, July 19, 2024)).

NAMA represents millers of wheat, corn, oats, and rye across the continental United States, Puerto Rico, and Canada. Our members take raw grain and, through grinding and crushing, create flour and other products that are used to make favorite foods, such as bread, cereals, pasta, cookies, cakes, and snack foods. We recommend the inclusion of U.S. milled oat products to the U.S. government's list of commodities eligible for use in international food assistance. The information provided here is general in nature, and further analysis would be required to refine the scope and accuracy of certain elements, including the commodity price and transportation cost noted in the table below.

Background
There are currently about 3 million harvested acres of oats in the United States, with roughly half used for human consumption and half for animal feed. In 2023, approximately 57 million bushels (1.3 million metric tons) of unprocessed oats were harvested. Already used widely in U.S. domestic feeding programs, such as school meals, milled oat foods would be a healthy and seamless addition to U.S. international food aid programs.



Why Oats?
Oats would be an excellent addition to the food basket for people suffering from food insecurity. The product provides many nutritional benefits, is shelf stable, and easy to prepare. Oats are versatile and can be used in baking, mixed into dairy products (such as yogurt or milk), and can be eaten as a stand-alone food. Oats in various forms are appropriate for children and adults of all ages. Oat production in the United States has been declining for the last several decades, as farmers have transitioned to more corn and soy production. There are efforts underway by USDA agricultural research service (ARS) to improve U.S. grown oat quality with the goal of increasing U.S. oat production. Building additional demand for oats would also contribute to this goal while encouraging broader crop diversity and sustainability in the growing region. The inherent value of oats as an ingredient in food production for snacks and ready-to-eat cereals could be increased in food insecure regions with familiarity among the beneficiaries, providing potential long term export opportunities for U.S. oat producers.

Summary of USDA Requested information

USDA Request	**Response from Industry**
Average cost per metric ton	Spot price from 08/2024 - $772 USD per metric ton, with rolled oats packed in 50 lb. kraft paper bags.
Estimated cost of delivery to a U.S. port	Freight to the port of Houston is $173 per MT
Packaging details including transport and containerization requirements.	Current pricing includes standard rolled oats or quick flake packed in 50 lb. kraft paper bags. Oats are typically stored at ambient temperature and must be cooked before consuming.
Expected shelf life under normal and adverse conditions.	In ambient conditions (low humidity and 70 degrees), 12-18 months are expected, with 6-12 months for less-than-ideal conditions. Like all cereal products, oats will deteriorate more quickly in hot, humid conditions.
Any history of storage performance for the commodity	Nothing is available in the food assistance context, but a strong/positive historical record is available regarding the domestic market.
Nutritional benefits for adults and children including essential minerals.	Oats are extremely nutritious, containing fiber, protein, carbohydrates, and minerals. Importantly, oats contain beta-glucan which is critical for heart health in all populations. More details below.
Testing requirements for food safety	Oats are a raw agricultural product and must be cooked before consuming. However, the commodity undergoes a log 5 reduction during the milling

	process which eliminates some bacteria and pathogens. Testing for salmonella and other soil borne pathogens is commonly requested in purchasing specifications.
Consumer preparation instructions, if any, including requirements for potable water, fuel, and cooking time	"Old fashioned" oats, which are milled, require approximately 5 minutes of cooking time in boiling water before consuming. Oats can be eaten alone as porridge, sometimes with added milk and sugar or mixed with fruits or nuts. Culturally, they are commonly consumed in the morning. Oats are harvested in the fall, but available year-round as they are nonperishable and stored after harvest.
Whether the commodity meets current Food and Drug Administration requirements	Yes – the commodity is widely used in the United States both in the minimally processed form (rolled oats) or in food processing as part of granola bars, cookies, and other prepared foods.
The current production capacity in the United States, and seasonality/availability of the commodity for export	The production of oats in North America is estimated at 3.5 million MT, with approximately 1.5 million MT going for domestic food use. Unprocessed oats are used for animal feed, horses in particular.
Known challenges and barriers around imports.	The biggest challenge for using oats in international food assistance is a lack of cultural awareness. Oats are not grown or consumed as part of traditional diets in Africa or Southeast Asia. They are available in modern supermarkets in both regions as cereal, oatmeal, and processed snacks, such as granola bars. Oats are grown and consumed as part of traditional diets in colder regions, such as former Soviet states and could be utilized without education in those regions. Educating consumers on a "new" cereal would be necessary if introducing oats in Africa or Southeast Asia. It is important to note that former food aid recipient countries tend to become future trading partners. Oats should be considered in this context, as they are used both as standalone porridge and as a food ingredient.

Intended age range for population if product is fortified.	Currently, oats are not fortified. However, on their own, oats provide significant nutritional benefits for all people, from young children to older adults.

Oat Nutrition

Oats are a nutritious whole grain cereal that contains many nutrients, including fiber, protein, carbohydrates, and minerals. Oats are high in antioxidants and plant compounds called polyphenols and provide a wide range of benefits. The beta-glucan fiber in oats is effective at reducing both total and LDL cholesterol levels which has been recognized by FDA and food global standards agencies. A unique type of antioxidants almost only found in oats called avenanthramides may help lower blood pressure and provide anti-inflammatory effects. Oats may help lower blood sugar levels, especially for those who are overweight or have type 2 diabetes. They can also help those who are trying to lose weight increase their feeling of fullness.

Healthline summarizes nine benefits of oats and oatmeal in simple terms below:

1. Are incredibly nutritious.
2. Contain antioxidants.
3. Contain soluble fiber.
4. May lower cholesterol.
5. Can improve blood sugar management.
6. May aid in weight loss.
7. Can help with skin care.
8. May lower childhood asthma risk.
9. May relieve constipation.

Detailed nutrition information from USDA's nutrition database on steel cut oats confirms these positive attributes. Nutrition labels from Quaker Old Fashioned Oats (bulk package – on left) and Original Cheerios (right) serve as examples of the nutritional value as well.

Nutrition Facts

About 113 servings per container

Serving size **1/2 cup dry (40g)**

Amount per serving

Calories **150**

	% Daily Value*
Total Fat 3g	4%
Saturated Fat 0.5g	3%
Trans Fat 0g	
Polyunsaturated Fat 1g	
Monounsaturated Fat 1g	
Cholesterol 0mg	0%
Sodium 0mg	0%
Total Carbohydrate 27g	10%
Dietary Fiber 4g	13%
Soluble Fiber 2g	
Total Sugars 1g	
Includes 0g Added Sugars	0%
Protein 5g	

Vitamin D 0mcg 0%	Calcium 20mg 0%
Iron 1.5mg 8%	Potassium 150mg 2%
Thiamin 0.2mg 15%	Phosphorus 130mg 10%
Magnesium 40mg 10%	

* The % Daily Value (DV) tells you how much a nutrient in a

Nutrition Facts / Datos de Nutrición

About 13 servings per container (age 4+ years)/Aproximadamente 13 raciones por envase (de 4+ años)

About 25 servings per container (age 1-3 years)/Aproximadamente 25 raciones por envase (de 1 a 3 años)

Serving size/Tamaño por ración 1⅓ cup/1⅓ taza (30g) (age 4+ years/de 4+ años)
¾ cup/¾ taza (20g) (age 1-3 years/de 1 a 3 años)

	Cheerios	with 3/4 cup skim milk/con 3/4 taza de leche descremada	Age 1-3 years/Edad de 1 a 3 años
Calories/Calorías	**140**	**210**	**70**
	%DV/VD**	%DV/VD**	%DV/VD**
Total Fat/Grasa Total 2.5g*	3%	4%	3%
Saturated Fat/Grasa Saturada 0.5g	3%	4%	0%
Trans Fat/Grasa Trans 0g			
Polyunsaturated Fat/Grasa Poliinsaturada 1g			
Monounsaturated Fat/Grasa Monoinsaturada 1g			
Cholesterol/Colesterol 0mg	0%	1%	0%
Sodium/Sodio 190mg	8%	12%	7%
Total Carbohydrate/Carbohidrato Total 29g	10%	14%	10%
Dietary Fiber/Fibra Dietética 4g	15%	15%	15%
Soluble Fiber/Fibra Soluble 2g			
Total Sugars/Azúcares Totales 3g			
Incl. Added Sugars/Incluye azúcares añadidos 1g	2%	2%	2%
Protein/Proteínas 5g			8%
Vitamin D/Vitamina D 4mcg	20%	30%	15%
Calcium/Calcio 130mg	10%	25%	8%
Iron/Hierro 12.6mg	70%	70%	90%
Potassium/Potasio 250mg	6%	10%	4%
Vitamin A/Vitamina A	10%	20%	15%
Vitamin C/Vitamina C	10%	10%	30%
Thiamin/Tiamina	20%	25%	25%
Niacin/Niacina	10%	10%	15%
Vitamin B_6/Vitamina B_6	20%	20%	30%
Folate/Folato (45mcg folic acid/ácido fólico)	20%	20%	25%
Vitamin B_{12}/Vitamina B_{12}	20%	50%	25%
Phosphorus/Fósforo	15%	25%	15%
Magnesium/Magnesio	10%	15%	30%
Zinc/Zinc	20%	25%	35%

* Amount in cereal. A serving of cereal plus skim milk provides 3g Total Fat (1g Saturated Fat), less than 5mg Cholesterol, 270mg Sodium, 30g Total Carbohydrate (11g Total Sugars), 11g Protein, 0.2mcg Vitamin D, 350mg Calcium, 540mg Potassium. / Cantidad en cereal. Una ración de

Additional Resource: "Nutritional advantages of oats and opportunities for its processing as value added foods – a review." Journal of Food Science Technology, 2015 Feb. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4325078/

Conclusion

We hope as USDA contemplates additional commodities for use in U.S. international food assistance that oats will be a top choice provided their nutritional benefits and ease of use. Thank you for your consideration.

Sincerely,

Stephanie Grunenfelder
Consultant
North American Millers' Association