



August 4, 2025

Heidi Overton, MD, PhD

The White House

Deputy Assistant to the President for Domestic Policy

Dear Dr. Overton,

On behalf of the Grain Chain, a coalition that includes farmers of wheat, rice and sorghum, along with the ingredient and food manufacturers who rely on their crops, we appreciate the opportunity to offer input in advance of the forthcoming MAHA Commission Report. As the Commission is working to publish recommendations that aim to improve Americans' health and nutrition, we submit the following information for your consideration.

American farmers have been at the forefront of grain production, blending tradition with technology. For decades, American farmers have supported a robust, homegrown partnership with the entire Grain Chain. For example, the vast majority (96%) of bakers' eggs, raw grains, and milled corn are sourced directly from U.S. farms.^{i ii iii iv} Farmers have also demonstrated their commitment to improving the nutritional value of grains through innovation. One example of this is the Louisiana State University AgCenter which partnered with farmers to develop and grow a new rice variety that increased protein by 53% to help Americans meet dietary recommendations for protein while also lowering the glycemic index.^v American farmers remain deeply committed to nourishing the nation's communities.

Grains, especially whole grains and grains with added vitamins and minerals, are an integral part of a healthy dietary pattern. The grains food category serves a critical role in ensuring Americans consume the recommended amounts of vitamins and minerals through the products that they create. In addition to these vitamins and minerals, their products also provide much needed fiber, folate, iron, and magnesium, all while delivering the taste, texture and color American consumers prefer.^{vi,vii} Sorghum, an American-grown, naturally gluten-free grain, provides key nutrients, including protein, fiber and B vitamins, and is one example of how different grains contribute to a nutrient-rich and balanced diet. Grain consumption has been found to lower the risk of common and costly nutrition-related chronic diseases such as obesity, coronary heart disease, diabetes, and colorectal cancer.^{viii ix x} Nearly all Americans, 98%, do not consume the recommended quantity of

whole grains, and less than 10% of Americans over the age of one meet the dietary recommendations for fiber.^{xi xii}

Many grain-based products in the US are fortified with folic acid, a form of vitamin B9, which plays a key role in ensuring healthy pregnancies and child development. Folic acid greatly reduces spinal defects that impact a child's growth and development.^{xiii} In fact, since the fortification of grain-based products with folic acid was introduced in 1996, the prevalence of neural tube defects has decreased by 35%, helping families and children have a healthy start to life.^{xiv} It is also estimated that this mandatory fortification saves over \$600 million in U.S. health care costs annually due to the reduction of spina bifida alone.^{xv}

Many grain-based foods drive consumption of other healthful foods as well such as legumes, vegetables, and meat proteins. For example, toast topped with vegetables is a delicious way to pack in nutrients at lunch. As another example, rice or sorghum is an enjoyable pairing with fish and vegetables.

Grains and grain-based products remain one of the most affordable and widely accessible staples – contributing to nutritious diets across all income levels and life stages. As the MAHA Commission drafts its recommendations to improve the health and nutrition of Americans, it is essential to continue to recognize grains as a foundational pillar of dietary quality. Any recommendation aiming to improve child nutrition should elevate the role of grains – whole and enriched – to foster long-term health outcomes.

We appreciate this opportunity to provide input to the MAHA Commission. For questions or additional information, please contact Grain Chain Leader Rasma Zvaners, Vice President, Government Relations, American Bakers Association, RZvaners@americanbakers.org.

Sincerely,

Undersigned Members of The Grain Chain

American Bakers Association

American Institute of Baking

Cereals and Grains Association

Independent Bakers Association

National Association of Wheat Growers

National Pasta Association

National Sorghum Producers

North American Millers Association

Retail Bakers of America

USA Rice Federation

Wheat Foods Council

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- ⁱ U.S. Bureau of Economic Analysis, Industry Economic Accounts: Gross Output.
- ⁱⁱ U.S. Bureau of Economic Analysis, Input-Output Accounts: Import Matrices.
- ⁱⁱⁱ U.S. Bureau of Economic Analysis, Input-Output Accounts: Supply Tables.
- ^{iv} U.S. Bureau of Economic Analysis, Input-Output Accounts: Use Tables.
- ^v Utomo, H., & Wenefrida, I. (2023, Summer). *Low-GI, high-protein rice: Directly connecting rice to positive health outcomes*. Louisiana Agriculture Magazine. LSU AgCenter. <https://www.lsuagcenter.com/articles/page1694205825627>
- ^{vi} Papanikolaou, Y., & Fulgoni, V. L. (2017). Grain foods are contributors of nutrient density for American adults and help close nutrient recommendation gaps: Data from the National Health and Nutrition Examination Survey, 2009–2012. *Nutrients*, 9(8), 873. <https://doi.org/10.3390/nu9080873>
- ^{vii} American Society for Nutrition. (2021, June 9). *Most Americans are not getting enough fiber in our diets*. <https://nutrition.org/most-americans-are-not-getting-enough-fiber-in-our-diets/>
- ^{viii} Wang, W., Li, J., Chen, X. *et al.* Whole grain food diet slightly reduces cardiovascular risks in obese/overweight adults: a systematic review and meta-analysis. *BMC Cardiovasc Disord* 20, 82 (2020). <https://doi.org/10.1186/s12872-020-01337-z>
- ^{ix} Ying, T., Zheng, J., Kan, J., & others. (2024). Effects of whole grains on glycemic control: A systematic review and dose-response meta-analysis of prospective cohort studies and randomized controlled trials. *Nutrition Journal*, 23, 47. <https://doi.org/10.1186/s12937-024-00952-2>
- ^x Ma, Y., Ni, J., Mei, P., Chen, Y., & Guo, X. (2025). The burden of colorectal cancer attributable to diet low in whole grains from 1990 to 2021: A global, regional and national analysis. *Frontiers in Nutrition*, 12, 1527522. <https://doi.org/10.3389/fnut.2025.1527522>
- ^{xi} U.S. Department of Agriculture and U.S. Department of Health and Human Services. Dietary Guidelines for Americans, 2020–2025. 9th Edition. December 2020. Available at DietaryGuidelines.gov.
- ^{xii} American Society for Nutrition. (2021, June 9). *Most Americans are not getting enough fiber in our diets*. <https://nutrition.org/most-americans-are-not-getting-enough-fiber-in-our-diets/>
- ^{xiii} Viswanathan, M., Urrutia, R. P., Hudson, K. N., *et al.* (2023). *Folic acid supplementation to prevent neural tube defects: A limited systematic review update for the U.S. Preventive Services Task Force* (Evidence Synthesis No. 230). Agency for Healthcare Research and Quality. <https://www.ncbi.nlm.nih.gov/books/NBK593617/>
- ^{xiv} Crider KS, Qi YP, Devine O., Tinker SC, Berry RJ. Modeling the impact of folic acid fortification and supplementation on red blood cell folate concentrations and predicted neural tube defect risk in the United States: have we reached optimal prevention? *Am J Clin Nutr*. 2018 Jun 1;107(6):1027-1034. doi: 10.1093/ajcn/nqy065. PMID: 29767673; PMCID: PMC6980262.
- ^{xv} Ibid.