

June 23, 2026



The Link Between Grain and Goodness

Dear Texas Nutrition Advisory Committee Members:

On behalf of our nation's grain millers, the North American Millers' Association (NAMA) welcomes the opportunity to submit comments on the draft report regarding Texas-specific dietary guidelines.

NAMA represents millers of wheat, corn, oats, and rye across the continental United States, Puerto Rico, and Canada. Millers grind raw grains grown on the farm into flour, cereals, and other ingredients used to make a wide variety of food options that are affordable and available year-round. NAMA requests the committee examine the beneficial role that fortified and enriched grains play in supplying critical nutrients like fiber, iron, and folate. The grain foods supply chain delivers safe, accessible, and affordable nutrition to millions of Americans.

Milling is one of the oldest forms of food processing. Mills are located in communities across the country, serving as an indispensable link between raw grain and foods that have sustained and enriched people's lives for centuries. Wheat, corn, and oats must be processed by milling to become food ingredients. Milling unlocks nutrients from grains so they can then be made into delicious, nutritious foods. Flour, bleached flour, and vitamin enriched flour are products defined by the U.S. Food and Drug Administration in regulation<sup>1</sup> and are identified on the food label. These definitions, which have been in existence for decades, describe what may be safely included in flour to improve its nutritional or baking properties.<sup>2</sup>

Whole grains contain all parts of the grain kernel, while refined and enriched grains are finely ground and have had specific vitamins added back after milling. Research shows that it is important to include both in one's diet because they provide different health benefits. Grain foods like bread, pasta, and tortillas are part of healthy diets here in the U.S. and around the world. Most refined grain foods are fortified with essential vitamins and minerals. They serve as important sources of critical nutrients, especially for pregnant women and children. Staple grain foods like bread, cereal, and pasta account for more than 80%<sup>3</sup> of all grains eaten.

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<sup>1</sup> Food and Drug Administration, Department of Health and Human Services. 21 CFR 137.105. Available at: <https://www.ecfr.gov/current/title-21/part-137/section-137.105>.

<sup>2</sup> Food and Drug Administration, Department of Health and Human Services. 21 CFR 137.165. Available at: <https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-137/subpart-B/section-137.165>.

<sup>3</sup> Grain Foods Research Institute. History and Public Health Benefits of Enrichment and Fortification of Refined Grains. 2025. Available at: <https://grainfoodsresearch.org/wpcontent/uploads/2025/03/Enrichment-and-Fortification-White-Paper.pdf>.

In total, grain foods account for less than 15%<sup>4</sup> of the total calories in the average American's diet. Further, enriched and fortified refined grain foods have become a primary source of dietary fiber – an under consumed nutrient of public health concern in the United States. Bread provides important nutrition. It is the most commonly-consumed whole grain food. Breads also make up about half of the total amount of refined grains that Americans eat.

Refined or enriched grains are often unfairly blamed for being unhealthy, yet they play a vital role in delivering the nutrients that Americans need, such as iron, folic acid, and B vitamins. Grain foods also play a key role in bridging nutrition gaps by making it easier to incorporate other food categories that we don't eat enough of. Sandwiches, tacos, and burgers rank among the most popular ways that Americans eat vegetables and protein. Cereals increase the consumption of milk and fruit.

Categorizing grain foods as “ultra-processed” and putting warning labels on them or restricting them from diets could have a negative impact on public health by making it harder for people to get nutrients they are already under-consuming. Further, a fundamental scientific and statistical principle is that causality cannot be inferred from association, and the scientific research on ultra-processed food (UPF) has not established a causal link between the broad “UPF” terminology and health outcomes. The current science indicates that nutrient composition is the primary determinant of the healthfulness and appropriateness of food in the diet. In many cases, processing techniques can improve the healthfulness and the safety of the food.

The data is clear that grain foods are essential to a healthy, balanced diet. We hope the committee can appreciate the role that grains play in the lives of millions of Americans every single day. We look forward to working with you.

Sincerely,

Kim Z Cooper  
Vice President, Government Affairs  
North American Millers' Association

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<sup>4</sup> Papanikolaou Y, Fulgoni VL. 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. 2017. Available at: <https://pubmed.ncbi.nlm.nih.gov/28805734/>.