

Required Information:

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Topics: Chapter D.1: Food and Nutrient Intakes, and Health: Current Status and Trends
Chapter D.2: Dietary Patterns, Foods and Nutrients, and Health Outcomes
Chapter D.4: Food Environment and Settings
Chapter D.5: Food Sustainability and SafetyComments submitted May 1, 2015

Dear Secretary Vilsack and Secretary Burwell,

On behalf of Oldways, a 501(c)3 educational non-profit dedicated to fostering good health through heritage, we applaud the 2015 Dietary Guidelines Advisory Committee for including many sensible, evidence-based recommendations in their report. Below are three issues we hope that the USDA and HHS will consider before releasing the 2015 Dietary Guidelines.

1. Whole Grains

We are pleased to see continued support for whole grains, and the recommendation to carry forward the language of the 2010 Dietary Guidelines. However, we urge you to clearly remind Americans that the message being carried forward is "Make AT LEAST half your grains whole." All too often, the message conveyed seems to be "Make half your grains whole and make sure you get an equal amount of refined/enriched grains."

It is important that the 2015 Dietary Guidelines do not foster the misconception that enriched grains are the nutritional equivalent of whole grains. They are not. Enriched grains are stripped of the nutritious bran and germ, losing 25% of the grain's protein, and greatly reducing at least 17 key nutrients (including fiber). Only a handful of nutrients are added back into enriched grains, and not in their original proportions.

According to the 2015 DGAC Report, "If whole grains were consumed in the amounts recommended in the Food Patterns, whole grains would provide substantial percentages of several key nutrients, such as about 32 percent of dietary fiber, 42 percent of iron, 35 percent of folate, 29 percent of magnesium, and 16 percent of vitamin A." Now double that, and imagine the nutrient contribution if we made all of our grains whole.

Folate, in particular, has been singled out as a nutrient of concern, but if Americans eat a diet full of whole grains (which would provide 70% DV for folate) and top it off with leafy greens and legumes, as advised in many of the food patterns, then it should be no struggle to get the recommended amount of folate. Grains were never meant to provide 100% of all necessary nutrients, but as part of an overall balanced diet, whole grains will certainly get us much closer than enriched grains. (It may, in fact, be useful for the Dietary Guidelines to clearly explain to Americans that enriched grains regain only a handful of the nutrients lost to refining; in our work with the Whole Grains Council we have found that many, many people believe that enriched grains have had all their nutrients restored.)

According to the latest (2010) USDA data, Americans currently make about 12% of their grains whole. While we would like to see our fellow citizens make nearly all their grains whole, we recognize that even achieving the half-way mark will be a useful step in the right direction. In the course of increasing whole grains and decreasing refined/enriched grains to work toward "making at least half their grains whole," Americans should be reminded to choose high quality grain foods, whether they're eating whole or enriched grains. The recommendation to make half your grains whole doesn't mean simply replacing refined-grain cookies with whole grain cookies. The quality of all grain foods matters, and preference should be given to intact grains, pasta, and other minimally-processed grain foods that are low in glycemic impact, without added sugars and sodium.

2. Mediterranean Diet

Oldways applauds the DGAC for emphasizing foods and food patterns over individual nutrients, with the inclusion of three healthy eating patterns in the 2015 DGAC Report. Specifically, we are very pleased to see the scientifically proven Mediterranean Diet highlighted in the DGAC report, as Oldways collaborated with the Harvard School of Public Health to create the Mediterranean Diet Pyramid in 1993.

Despite this step forward, we encourage the USDA and HHS to revisit their definition of a Mediterranean Diet, to be closer to that of a "true" Mediterranean Diet. For instance, the Mediterranean Dietary Pattern, as defined by the 2015 DGAC, contains twice the amount of red meat as recommended in the USDA pattern. A true Mediterranean diet (such as one represented in the Mediterranean Diet Pyramid, or used as the basis of a Mediterranean-Style Dietary Pattern Score in numerous nutrition studies) contains much less red meat and has a greater emphasis on whole grains, among other differences.

We understand that the Mediterranean Diet Pattern recommended in the DGAC report is based on diets self-labeled as "Mediterranean" in certain studies, but we think it's important to point out that a true Mediterranean Diet confers greater health benefits than the "Americanized" Mediterranean Diet referenced in this report. By including large amounts of red meat, and only small amounts of whole grains in this "Mediterranean Pattern," we are concerned that Americans may miss out on the even greater benefits of a true Mediterranean Diet.

3. Role of Dietary Guidelines in Policy

Oldways would like to voice our support for the 2015 DGAC in raising concerns about sustainability and food policy. Analyzing the sustainability and accessibility of the foods promoted in the Dietary Guidelines can only strengthen the guidelines, as the best dietary advice on the planet is meaningless if we aren't able to produce or access the foods recommended for health. Future generations of Americans will be at a disadvantage, unless we start recognizing the link between the health of our planet, the health of our food supply, and the health of our citizens.

As others have pointed out, this is not the first time that the DGAC has explored food and nutrition through broad terms, rather than narrowly defined nutritional issues. Previous DGAC reports have made recommendations regarding food safety (2005 DGAC), food cost and availability (2005 DGAC), and food marketing (2010 DGAC). Just as these considerations fall within the purview of the DGAC, so too does sustainability.

There is also an important and established role for the Dietary Guidelines in influencing federal food policy. Those who claim the DGAC is overstepping its bounds in suggesting standards for Child Nutrition Services / school meals, WIC, or SNAP should be reminded that federal law (7 USC Sec 5341) mandates that the dietary guidelines "shall be promoted by each Federal agency in carrying out any Federal food, nutrition, or health program."

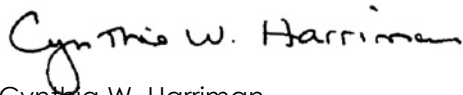
Congress especially needs to be reminded of this mandate as it relates to the National School Lunch program. Currently, for example, although the Dietary Guidelines have, since 2005, said "Make At Least Half Your Grains Whole," there is an effort to undermine whole grain standards in school meals. Allowing schools to relax the rules and make only half their grains "whole grain rich" – a standard that requires foods to contain 50% whole grain – would mean that children are effectively making just a quarter of their grains whole grain (half x 50%). This step backwards is out of line with federal law, and a blow to children's health.

We encourage USDA and HHS to include sustainability and food policy considerations in the final Dietary Guidelines, and to include a strong statement, based on federal law, of the foundational nature of the Dietary Guidelines in all federal food policy.

Thank you for your consideration.



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