

October 26, 2015

Dietary Guidelines Communications
Center for Nutrition Policy and Promotion
U.S. Department of Agriculture
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom It May Concern:

The members of the Grain Chain, a grains industry coalition from farm to table, strongly support the Center for Nutrition Policy and Promotion's (CNPP) proposed information collection addressing development of nutrition education messages and products for the general public. Testing of potential messages is standard procedure for any significant marketing campaign. This is an essential step for CNPP to take as it prepares to educate consumers and others about the soon-to-be-released 2015 Dietary Guidelines for Americans.

Specifically, the Grain Chain recommends CNPP consider questions aimed at assessing consumers' knowledge and understanding of the terms "refined," "enriched," and "whole grain." We believe significant confusion exists among consumers regarding these terms so an assessment of consumer understanding will be particularly important when crafting grain recommendations in the Guidelines.

While we recognize that scientific studies routinely use the term "refined" grains, we believe the term "enriched" is more appropriate in consumer messaging to describe the grain products that the average American sees in the grocery aisle. These staple foods contain some fiber and are enriched with important nutrients, like thiamin, niacin, riboflavin and iron. They are fortified with folic acid, which is essential for women of childbearing age to help prevent neural tube birth defects.

We also suggest CNPP consider testing messages that convey the concept of "staples" when making dietary choices regarding foods like grain foods. Clearly, there is a difference between consuming a healthy sandwich on enriched white bread, and consuming cake. In the past, CNPP has typically made blanket recommendations regarding consumption of "refined" grains which has the potential to lead to consumer misunderstanding and uninformed food choices.

It is important to clarify that we are not advocating a "good grain, bad grain" approach and we strongly believe that **all** foods fit in a healthy diet. Yet, when educating consumers, we feel generalized advice to limit a certain category of foods has little useful relevance.

Thank you for the opportunity to provide input into this important process. If you have questions or need additional information, please contact Lee Sanders, American Bakers Association, lsanders@americanbakers.org, 202-789-0300.

Sincerely,

American Bakers Association (ABA)
American Institute of Baking International
Grain Foods Foundation (GFF)
Independent Bakers Association
National Association of Wheat Growers (NAWG)
National Pasta Association (NPA)
North American Millers' Association

Retail Bakers of America
USA Rice Federation
Wheat Foods Council (WFC)

Descriptions of Grain Industry Organizations

American Bakers Association (ABA) is the Washington, D.C.-based voice of the wholesale baking industry. Since 1897, ABA has represented the interests of bakers before the U.S. Congress, federal agencies, and international regulatory authorities. ABA advocates on behalf of more than 700 baking facilities and baking company suppliers. ABA members produce bread, rolls, crackers, bagels, sweet goods, tortillas and many other wholesome, nutritious baked products for America's families. The baking industry generates more than \$103 billion in economic activity annually and employs 633,000 highly skilled people. RMackie@americanbakers.org

American Institute of Baking International (AIB) is a corporation founded by the North American wholesale and retail baking industries in 1919 as a technology transfer center for bakers and food processors. The original mission of the organization was to "put science to work for the baker," which is still central to all of the programs, products, and services provided by AIB to baking and general food production industries worldwide. abiane@AIBonline.org

Grain Foods Foundation (GFF), a joint venture of members of the milling, baking and allied industries formed in 2004, is dedicated to advancing the public's understanding of the beneficial role grain-based foods play in the human diet. Directed by a board of trustees, funding for the Foundation is provided through voluntary donations from private grain-based food companies and is supplemented by industry associations. ccochran@grainsfoundation.org

Independent Bakers Association (IBA) The Independent Bakers Association is a Washington, D.C. based national trade association of over 400 mostly family owned wholesale bakeries and allied industry trades. The Association was founded in 1968 to protect the interests of independent wholesale bakers. nick@theindependentbaker.com

National Association of Wheat Growers (NAWG) is a federation of 21 state wheat grower associations that works to represent the needs and interests of wheat producers before Congress and federal agencies. Based in Washington, D.C., NAWG is grower-governed and grower-funded, and works in areas as diverse as federal farm policy, trade, environmental regulation, research and climate change. jpalmer@wheatgrowers.org

National Pasta Association (NPA) Founded in 1904, NPA is an organization of pasta and pasta-related product manufacturers, millers and suppliers to the US pasta industry serving as a cohesive industry advocate, a promoter of pasta and a center of knowledge for its members, the government and the public. pastafits@kellencompany.com and CFreysinger@kellencompany.com

North American Millers' Association (NAMA) is the trade association of the wheat, corn, oat, and rye milling industries. Member companies operate mills in 38 states and Canada, representing more than 90 percent of total industry production capacity. jmccarthy@namamillers.org

Retail Bakers of America (RBA) was founded in 1918. Its purpose is to assist retail bakers in furthering the health of the nation by making available delicious bakery foods; to foster a better relationship between the public and the baking industry; to promote and encourage the production of high quality, wholesome, healthful bakery foods; and to represent the baking industry, especially its retail branch, to the government. Bernadette@RetailBakersofAmerica.org

USA Rice Federation is the global advocate for all segments of the U.S. rice industry with a mission to promote and protect the interests of producers, millers, merchants and allied businesses. Over 20 billion

pounds of long, medium, and short grain, and organic and specialty rice is grown and harvested each year by farmers in Arkansas, California, Louisiana, Texas, Mississippi and Missouri. bward@usarice.com

Wheat Foods Council (WFC) is a nonprofit organization formed in 1972 to help increase public awareness of grains, complex carbohydrates, and fiber as essential components of a healthful diet. The Council is supported voluntarily by wheat producers, millers, bakers and related industries.

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