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AUG 16 2004

ERNIE FLETCHER
GOVERNOR

CABINET FOR HEALTH AND FAMILY SERVICES
DEPARTMENT FOR PUBLIC HEALTH
NUTRITION SERVICES BRANCH

JAMES W. HOLSINGER, JR., M.D.
SECRETARY

FRANKFORT, KENTUCKY

August 11, 2004

David Herring, MS
Nutritionist
USDA - Center for Nutrition Policy & Promotion
3101 Park Center Drive, 10th Floor
Alexandria, VA 22302-1594

Dear Mr. Herring:

As dietitians and nutritionists in public health, we have utilized the USDA Food Guide Pyramid since it was released in 1993. After reviewing information from USDA about the reasons for redesign review of the pyramid, we wanted to submit comments and concerns about changing an "icon".

From recent review of USDA information, there is a high recognition factor for the Food Guide Pyramid. Many people also understand some of the messages from the Pyramid. Thus it seems counterproductive to create a new design that increases the need for more education, awareness and recognition. The Food Guide Pyramid was not designed to stand alone and provide the entire message concerning portions, foods, vitamins and mineral intake and calorie consumption.

We understand that usage and understanding are very important concepts for this education tool but we need to simplify the messages. Scientific information must be included to keep current with the Dietary Reference Intakes (DRI's) but this may not be the tool for that information. We need to keep the message simple and focused. We do not need to provide the complete message through one graphic representation. We need to remember that we are trying to take science and apply the science in a user friendly manner.

Our problem as the nutrition community has been we want to provide one tool that everyone will understand and use. This is not possible in the diverse culture we live in today. We also feel that change again just supports the public's idea that "nutrition is always changing and I do not know which message to believe and thus choose to follow no message". Thus we are encouraging the committee to focus on clear messages but to keep the pyramid as the graphic illustration.

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Please recognize that a 70-80% recognition rate of a graphic is quite high in this culture that is bombarded with new messages and graphics each day. Thus we are urging this committee to keep the graphic but develop simple messages and companion education materials to carry out the message about servings and portions. Does the public really care about the DRI's? We just need to give them simple information to be able to incorporate into a busy lifestyle.

Thank you for consideration of these comments.

Sincerely,

Fran Hawkins, MS, RD, LD

Fran Hawkins, MS, RD, LD
Manager
Nutrition Services Branch

Wendy Carlin MS, RD, LD

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cc: James S. Davis, M.D.

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Greger 10-1

Michael Greger, M.D.

Woods Hole, MA

The Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive Room #1034
Alexandria, VA 22302

8/12/04

Dear reassessment team,

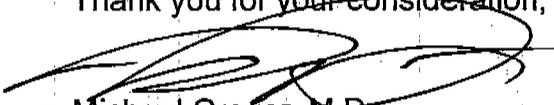
Thank you for this opportunity to add my input regarding the Food Pyramid.

For me, nutrition recommendations are a question of baggage. Yes, for example, we can get our protein from meat, but what baggage comes along with it? Artery-clogging saturated animal fat. Shouldn't vegetable sources of protein such as beans, nuts, and whole grains be emphasized instead? The "baggage" you get with them is fiber and phytonutrients not found in animal-derived foods.

Yes, milk is an excellent source of calcium. But it's also an excellent source of saturated fat—fluid milk is the number one source of saturated fat in our children's diet in this country. It's also a source of allergy for some and lactose intolerance for many. So it turns out milk may actually *not* be an excellent source after all. Why not emphasize green leafy vegetables such as kale, collards, bok choy, etc.? With those you get the calcium, but you also get not only the fiber and folate but also other bone-building nutrients such as vitamin K and vitamin C and potassium and magnesium. It should come as no surprise that in the Harvard Nurse's Study, those eating a serving of dark leafy greens seemed to cut their risk of hip fracture in half, whereas there did not seem to be any protective benefit from dairy consumption.

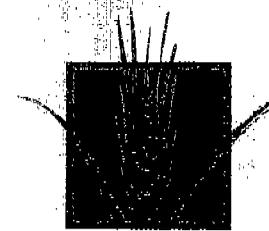
It would also improve our nation's health to de-emphasize processed foods like fruit juices, and refined grains, lacking in fiber, and in the latter case, many nutrients like vitamin E and phytochemicals which cannot be easily added to current fortification recommendations.

Thank you for your consideration,


Michael Greger, M.D.

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JS



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Adams / 10/25

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Telephone:
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Wheat Foods
COUNCIL

August 13, 2004

Eric J. Hentges, Ph.D.
Executive Director
Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

RE: Federal Register Notice 42030, Volume 69, No. 133, July 13, 2004
Center for Nutrition Policy and Promotion; Notice of Availability of
Proposed Food Guide Pyramid Daily Food Intake Patterns and Technical Support
Data and Announcement of Public Comment Period

Dear Dr. Hentges:

Thank you for the opportunity to comment on the Food Guide Pyramid graphic. The Wheat Foods Council is an industry wide trade association whose mission is to educate the public about the healthful role of grain foods in a balanced diet. Our membership includes grain producers, millers and end-product manufacturers.

We will attempt to give good input on the six areas which you requested guidance in the Federal Registry:

A) Advantages and disadvantages of retaining current shape for graphic and other potential shapes to use as a representative of the overall Food Guidance System.

We commend USDA and CNPP for using sound science to base the visual graphic for the Dietary Guidelines for Americans. According to our latest Gallup survey (2002) the Food Guide Pyramid was recognized by 76 percent of American adults over the age of 18 (another five percent were familiar with it in name only). Eighty-two percent of those agreed that the Food Guide Pyramid is the foundation of a sensible, healthful eating plan. This level of recognition is extremely high, a branded equity envied by most company CEOs. It should not be taken for granted or squandered in an effort to make it a more

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Wheat Foods Council's Food Guide Pyramid comments, August 13, 2004, page 2.

effective education tool. That said, it has not been a fully successful educational tool since it is estimated that less than 10 percent of Americans actually follow the Pyramid recommendations.

In a time when the government is under fire because of the erroneous public perception that the Pyramid recommendation has caused obesity, it would not be prudent to change the shape and reinforce that perception. This would only reaffirm, in some minds, that the dietary advice given since 1992 was wrong. It is however, a time to make the graphic simpler, forcing people to search for more detailed information.

Although we understand this is an eating guide, we have no objection to a base level of physical activity emphasizing the relationship between calories in and calories out. We would not want this to divert attention from the food guidance focus of the Pyramid, however.

B) Usefulness of the proposed strategies to highlight both motivational/awareness and educational messages.

As we all readily admit, the Food Guide Pyramid cannot stand alone as an educational tool -- it is only a symbol for healthful eating. We could support using just the shape as a logo along with a tagline reminding people of balance, variety, moderation and the need for accompanying physical activity. A tagline such as "Make Your Calories Count" would be a reminder of the importance of the level of calories appropriate for each individual.

Trying to emphasize dark green leafy vegetables, nutrient rich fruits, lean meats, low-fat dairy products or whole grains, is more information than any one graphic can possibly depict. We agree that this information can better be addressed in accompanying materials.

If there continues to be a "base" of the Pyramid or what ever shape the graphic takes, it is important that the grains group remains there. Research has shown that grain foods are needed to provide B vitamins (including folic acid), iron, fiber and numerous other vitamins, minerals and phytonutrients. In addition, they are inexpensive, convenient, easy-to-store, popular and hold a predominant place in the diet of nearly all cultures. This can not be said for all of the food groups.

While there is a strong consensus for the value of whole grains because of their *fiber* content, it is also important to consider their contributions of *antioxidants* and numerous other nutrients. One thing all researchers agree upon is that the "whole is more than the sum of its parts." In addition, "fiber is not fiber." Cereal fiber contains compounds which fruit and vegetable fibers do not. Studies that show the various health benefits of whole grains, including possible risk reduction of heart disease, some cancers, type 2 diabetes and stroke (1,2,3).

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Wheat Foods Council's Food Guide Pyramid comments, August 13, 2004, page 3

Separating the whole grains from enriched grains would be very confusing to the public and might send a message that enriched grains are not recommended. While we know Americans need to consume more whole grains, there is ample evidence that enriched grains have decreased neural tube birth defects, heart disease and stroke (4,5). If people believe they should not consume enriched grains, these diseases will increase back to their pre-folic acid fortification levels.

C) Advantages and disadvantages of the plan to individualize guidance in contrast to "generalized" messages.

We agree that "one size does not fit all" for nutrition guidance but there are some general messages that do provide an umbrella over the entire issue: "Calories Count" and the importance of variety, balance and moderation. Although some consumers profess not to know what moderation means, the majority have enough common sense to fully understand the concept. The 2005 Dietary Guidelines Advisory Committee continues to stress the importance of flexibility in the diet for each individual. That could also serve as a generalized message.

We trust your consumer research plans are continuing to explore and discover not only what messages resonate, but which ones inspire them to change their behavior. Other groups, such as the Dietary Guidelines Alliance and the U.S. Potato Board have tested messages with adults and children and can offer more guidance in this area.

D) Advantages and disadvantages of the planned focus on core messages in contrast to use of a graphic to represent educational messages.

We covered most of this in section A. We can support the graphic as a "brand" as long as there are over-arching principles applied for all of the messages. We assume the Dietary Guidelines Advisory Committee's conclusive statements will be incorporated in the Pyramid messages in some form.

The messages must be fun, interesting, practical, simple and primarily positive. In 1998 and 1999 IFIC conducted focus groups with consumers and discovered that they felt messages that were positive in tone were more likely to be motivating and alleviate confusion about nutrition (6). It is the position of the American Dietetic Association that "Nutrition messages from dietetics professionals can be more effective if they focus on a positive image of healthy food choices over time, rather than individual foods to be avoided" (7).

E) Key components for effective interactive educational tools.

We applaud the use of the Internet and CD-ROMs for using the Pyramid messages with children as most of them have access at school or libraries. The low-income and elderly, as you know, will be the hardest to reach. Food stamp recipients and seniors may be reached with written materials available with food stamps, WIC offices and senior federal program centers.

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Wheat Foods Council's Food Guide Pyramid comments, August 13, 2004, page 4.

The Healthy Eating Index (HEI) appears to be an excellent interactive tool that could be made interesting to all ages with minor modifications. It must also be made easier to find on the Internet. Google searches only pull up an academic document regarding the HEI and not the interactive format. According to Hann et al, "The HEI is a useful tool for describing the overall diet pattern and represents a promising new tool for nutritional epidemiology" (8). A study from Tufts and Harvard reported that women who followed the Dietary Guidelines were less likely to have age-related nuclear lens opacities (cataracts), as measured by the Health Eating Index (9).

Food choices will have to be very broad to account for all ethnicities. Activity levels must be spelled out clearly. Many people who think they are "active" actually are "sedentary."

A possible non-Internet tool would be a wheel in which the user "dials in" their sex, age and activity level to determine the number of needed calories and number of servings from the Pyramid food groups. The wheel would also include a toll-free number, mailing address, or suggested agencies to contact for food guidance.

F) *Channels of delivery for the Food Guidance System.*

This is an excellent opportunity for the industry and government to build a successful partnership. Food companies have Web sites that are accessed by children on a regular basis and could either include the CNPP interactive materials or have a link to them.

Food manufacturers were excellent supporters of the Pyramid by placing it on their packaging, posters, in-store and educational materials. Associations, such as the Wheat Foods Council, would be enthusiastic about adding the information to their Web sites and educational materials. It is to their advantage, and the government's, to get this information out to the consumer as soon and as effectively as possible. The government would not even have to consider the huge cost of advertising; the food companies and associations would do it for them.

This new graphic and accompanying educational materials should be thought of, and treated as, a new product introduction. The industry has the expertise and resources to make that happen if the government partners with them.

In closing, we'd like to make one final request that does not pertain to any of the six questions you posed, but that is very important to the health of Americans and our industry. **Would you please make one statement in the document that acknowledges the historical benefits of enriched and fortified grains in the American diet by virtually eliminating beriberi and pellagra; reducing the incidence of neural tube birth defects and iron-deficiency-anemia; and lowering the incidence of death from heart disease and strokes?**

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Wheat Foods Council's Food Guide Pyramid comments, August 13, 2004, page 5.

Thank you for the opportunity to comment and please be assured the Wheat Foods Council is eager to partner with you.

Sincerely,



Judi Adams, MS, RD
President

References:

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- 5) K Kratina. *Folic acid. Even better than we thought.* Parker, CO: Wheat Foods Council; 2004.
- 6) IFIC.org 2004 International Food Information Council Foundation.
- 7) Total diet approach to communicating food and nutrition information: Position of the American Dietetic Association. *J Am Diet Assoc.* 2002; 102:100.
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Applebaum

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AUG 16 2004

[Signature]

Michael Applebaum, MD, JD, FCLM

Chicago, IL

Tel:
Fax:

Thursday, August 12, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom It May Concern:

There can be little doubt as to the sincerity of USDA in its attempts to fight the obesity and overweight epidemics through revamping of the Food Guide Pyramid and soliciting from the public ideas for catchphrases. The belief in change as a way to get the message out is...conventional. Admittedly, I have contributed suggestions for changes.

Still, is this the best approach? Do you really suffer from an inability to get the word out?

Interestingly, the FDA acknowledges that the public possesses a lot of knowledge about food and health. It is just ignored.

"There is growing evidence of a public health gap in knowledge and behavior with respect to substance/disease relationships. According to the recent Sloan State-of-the-Industry Report published in *Food Technology* (Top 10 Trends to Watch and Work On, April 2003), consumers have no problems holding dichotomous attitudes about the pleasures of food and its power to influence their health. As more shoppers acknowledge indulging their cravings, more of them also admit that what they eat can have a major effect on how healthy they feel.

A fairly recent Food Marketing Institute (FMI, 2002) Trends in the United States Survey indicated that the percentage of consumers who recognize the importance of eating healthfully and who are interested in trying foods that may improve their health is increasing. 86% *agree* or *strongly agree* that "in most cases, eating healthfully is a better way to manage illness than medications," up from 76% in 2001. 54% said they are *very interested* in trying health-promoting foods. 51% want products designed to help them with high blood pressure and diabetes; 50% with allergies; 49% with weight control; 41% with osteoporosis; 40% with arthritis, and 40% (women only) with problems with women's hormones.

Despite these encouraging findings, other results from the same survey indicate that the percentage of consumers who acknowledge unhealthy eating behaviors is also increasing. 72% of shoppers *agree* or *strongly agree* with the statement, "I eat foods I enjoy, even if they're not good for me," up from 64% in 2001. 34% *agree* or *strongly agree* with the statement, "I eat whatever I want and don't think much about how it affects my health," up from 25% in 2001.

Even though the problem may not strictly be the inability to publicize the virtues of good nutrition and what that comprises, it remains appropriate for USDA to continue its efforts. Image-wise, I suggest that the USDA adopt a "USA Today"-approach. As examples:

In addition to the new Food Guide Graphic, publish daily or weekly images showing the waste and loss to our society from resources siphoned off by over-eating and under-activity. Give us an image showing the Top 50 drugs and what they treat:

- 14 for coronary artery disease
- 10 for hypertension
- 6 for hyperlipidemia
- 3 for osteoporosis
- 3 for depression
- 2 for arthritis
- 1 for Type II diabetes

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(What is so interesting about this grouping is that 39 of the Top 50, almost 80%, are used to remedy conditions that we cause ourselves or can treat without drugs, i.e., these are largely diseases of overeating and inactivity. Government dollars, i.e., our dollars, pay for these medications instead of other things.)

Release pictures of current government expenditures on education and infrastructure (like the nation's electrical grid) and how they could look if we bypassed our mouths and stomachs and put the resulting savings into these areas.

What more should USDA do?

We, as a society, have chosen, in addition to labels, slogans and pictures, other means to discourage the abuse of ingestible substances that negatively affect the collective, such as alcohol (ethanol). These include: the prevention of some persons from overindulging (Dram Shop Acts), civil penalties and criminal punishment.

In other words, in some cases our culture demands responsible behavior and punishes those who fail to act accordingly.

Control of the obesity and overweight epidemics should be no exception.

The results of unhealthy diet and inactivity are well-documented: epidemics of obesity and overweight, Type II diabetes, heart disease, certain cancers, stroke, asthma, chronic disorders, fractures and death. The costs associated with these diseases are debatable to the dollar amount and the number of people affected, but are undeniably impressive. One estimate, from the Center for Science in the Public Interest, places the annual expenses at 617 billion dollars, the lives lost prematurely between 310,000 and 580,000 and the number of Americans living with unhealthy diet- and inactivity- related disorders at 215,160,000.

A recent study from Harvard's Kennedy School of Government determined that 65% of respondents blamed obesity on their own weakness of will and inability to maintain a regular diet

and exercise regimen. The same study suggested that adults are generally opposed to government intervention in the epidemic. But when it came to taking action for our children, the majority favored some form of government control.

So this is where USDA should also participate. As a government agency, USDA has better access to other Departments than most members of the public. Help the kids by considering/facilitating implementation of several approaches built on currently accepted concepts:

1. **Gram Shop Acts:** grams of fat, that is. Dram Shop Acts generally hold people who serve alcoholic beverages liable under state laws for damages consequent to their patron's intoxication. The customer, not a minor, usually has no cause of action. Food service establishments, where children can obtain meals that exceed 300 calories, should be given the responsibility to deny service to obese minors. Grocery stores should be similarly empowered to prevent the sale to minors of food items in excess of 150 calories with fewer than 12 grams of protein per serving. Bar code scanning and nutritional databases make this data automatically obtainable.
2. **Child Abuse/Neglect:** Each state, as well as the feds, has its own definition. The federal definition is "the physical and mental injury, sexual abuse, negligent treatment, or maltreatment of a child under the age of 18 by a person who is responsible for the child's welfare under circumstances which indicate that the child's health or welfare is harmed or threatened." Parental/guardian omissions or commissions, harming a child's health or welfare through poor diet or inactivity, should be handled as other forms of child maltreatment. Starving a child is an example of an offense at the opposite end of the nutritional maltreatment spectrum that has already been prosecuted.
3. **Battery:** A minor is the victim of a harmful or offensive contact when his/her body is injured. It is unarguable that poor diet results in childhood disease, i.e., injury. A minor cannot consent to such contact. Those who cause minors a nutritionally harmful contact are culpable.

4. **Reverse Quarantine:** In situations of epidemic disease, the government can impose quarantine on those affected to stop the spread. Obesity is recognized as a disease and is of epidemic proportions. For their own good and to control the epidemic, for which there is an element of social transfer, quarantining obese children from food service and food sale establishments should be considered.

5. **Abused and Neglected Child Reporting Acts:** Physicians are obliged to report instances of certain diseases and suspected child abuse to state agencies. Child victims of suspected unhealthy diet and inactivity should be brought to the attention of the proper authorities for intervention.

6. **Wrongful Lifestyle:** Wrongful acts result in harm from negligence or other liability. A child injured through unhealthy diet and inactivity by those responsible for the minor's care can bring this new cause of action. As children tend to be influenced by adult behavior, those adjudicated as responsible for wrongful lifestyle should be required to set a proper example to the children, if their own physical conditions reflect unhealthy diet and inactivity.

7. **Oversight of Government Programs:** Governments already impose limits on the use of our dollars. An example is the restriction of ethanol from those items which can be purchased with food stamps. Another program, WIC, is designed to provide "proper nutrition" for certain segments of the population. Computerized checkout technologies can help promote healthier eating by preventing certain foods or combinations of foods from being purchased.

8. **Media Disclosure:** The media like to pride themselves on truthful reporting. As more correspondents appear on "infotainment" shows, the capacity in which they speak becomes blurred. The public frequently relies on the presumed trustworthiness of these individuals. When these shows present health-related segments that can be related to children, they should be required to disclose the rigor of the research behind the piece,

stating whether it is of the same caliber as their news investigations or merely "fluff." Networks and other media publicizing health-related products that might be used by children can honestly and prominently disclose "None of the information in the following commercial has been proven true by any health authority."

9. **Manufacturers: Labeling requirements** are frequently controversial. That is because they often warn of dangers. To help the children, "educating labels" should be placed on food items to assist both children and their caregivers in making healthy food choices.

10. **Adult Responsibility for the Acts of Children:** Adults have been held liable for societal harm caused by the minors for whom they are responsible. There can be little doubt that unhealthy eating and inactivity among children result in harm to society. Those adults responsible should face accountability.

11. **After School Fitness Programs:** Joint efforts between health plans and community/private facilities that will offer employees responsible for children and employers discounted costs of coverage for documented attendance and improvement in the children.

By initiating/supporting some or all of the preceding USDA may be able to prevent a next generation from developing the scope and scale of illnesses that are so costly in terms of dollars, lives, function and happiness.

There are, of course, adult-oriented intervention strategies that USDA can adopt, lobby for or possibly influence. As examples, for medications that treat diseases of choice, these can include:

1. **Drug manufacturers must include in their advertising:**
 - information on how to avoid needing the promoted drug,
 - the costs to society of the disease being treated and

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the type of death and diminished quality of life one can expect from the disease.

This is similar in concept to many of the public service spots sponsored by the "responsible" tobacco companies.

2. Support the drug companies in their quest for fair profits which are used for research and development and education.
3. In return for pricing concessions, back the "one bite doctrine." This states that after a fixed period of time, the public has been given notice about the behaviors that lead to diseases of choice. Afterwards, the drug companies will be free to sell these medications for self-induced indications at "fair market value."

Arguably, the real issues facing USDA and the rest of government are self-destructive behaviors and making the rest of us assume the costs. Promoting the use of societal resources and providing pecuniary rewards in support of bad conduct are strategies designed to perpetuate problems, not solve them.

No one suddenly wakes up overfat. Many saw these problems, as we now see our fellow citizens, coming a mile away. These problems, (again) together with our fellow citizens, grew to mammoth proportions because decisions leading to effective early intervention were not made. We are paying the heavy price of failure to act. USDA should display real seriousness in this campaign against obesity and overweight. It is incumbent upon it to form alliances with other governmental bodies to influence the public. In war, the various armed services work together. In this war, literally for the hearts and minds of the public, USDA must ally with other services.

USDA together with HHS should take a lead in working with FCC and IRS in combating the enemies of fitness and health. Promote a real effort to get advertising propaganda for ineffective, wasteful products off the air, consider denying tax-exemptions to groups supporting, unhealthful/harmful behaviors, make or cause the possibly tough, but beneficial decisions.

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Bottom line. Sure, it's good that USDA wants to improve the picture and slogan. Trying to do something great would be better.

Thank you.

Sincerely,



Michael Applebaum, MD

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[Signature]

Food Guide Reassessment Team USDA
Center for Nutrition Policy and Promotion
3101 Park Center Drive 10th Floor
Alexandria, VA 22302

August 10, 2004

What I don't like about the present food pyramid is that it really doesn't stress the importance of eating whole grain/high fiber food.

People really think that eating 'wheat' bread is the same as eating a really high fiber bread.

People really need to be eating breads and grain foods that have about 3 or more grams of fiber per serving.

I think that this needs to be stressed. Walter Willets food pyramid is better at this. It also may be helpful to stress that adults need to be getting 25-30 grams of fiber per day while children need about their age plus 6grams per day.

I also feel that too much emphasis is on what people weigh. Yes, we do have a very overweight country but you can be over weight and have great blood sugar levels and cholesterol levels. You can also be underweight or at your ideal weight and have horrible blood sugar levels and cholesterol levels.

It is what we eat that is really the problem. People tend to eat horribly. Many people think that they are eating healthy when they eat granola bars loaded with hydrogenated oils and sugar.

When people learn more about a high fiber diet, they will have a much better chance of lowering their weigh, blood sugar levels and cholesterol levels. I would like to see some examples clearly denoted that are of foods high in fiber: Legumes, fruits, vegetables, whole grains, nuts, and seeds. This should be what is emphasized on any food pyramid or food visual.

I would also like to see more emphasis on drinking pure water. I think that there is too much put on the consumption of dairy products. Maybe this is because I live in Wisconsin but I have read that there is a great possibility that 80% of our bone strength has to do with exercise. I know that my bones are very dense and I have not drank milk for about 26 years of my life. I do eat very healthy and I exercise regularly.

Healthy oils also need to be stressed. People really have no idea what is a good fat and a bad fat. I would like to see this emphasized too. People are eating too much hydrogenated oils. I would like to see some way of teaching people about hydrogenated oils and the importance of avoiding them whenever possible.

The more people learn about what is really healthy, ie whole grains, high fiber, pure water, and no hydrogenated oils, the more that food manufacturers will put these foods on the market. Some potato chips and corn chips are now being made with healthy oils. This is really exciting to me.

One more thing. Because the present food pyramid is so confusing and misleading, school districts have falling into the trap of serving horribly unhealthy foods. I think that it is our responsibility to change this by creating a food diagram that teaches schools what really is healthy eating.

Thank you for your consideration,
Katie Simenson

Kansasville, WI

August 12, 2004

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AUG 16 2004

gsp

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear Team:

As a clinical nutritionist – RD for 28 years and having worked in hospitals, nursing homes, and for home care agencies, as well as private practice, I have used many forms of nutrition education materials. **I find the food pyramid to be the most useful and adapt-able to various combination diet restrictions and additions.** I revise some of the information on the form, and add a separate sheet with nutrition label information and a sheet with a meal pattern format. I find that most patients require a positive direction, rather than a negative approach. For example: Patients requiring a sodium, cholesterol, concentrated sweets, protein, fat, and caloric **restrictions** require a food exchange plan to eat sufficient quantities of all nutrients. Many patients have told me that they have seen the food pyramid, **but never learned how to use it.** After receiving individual nutrition therapy counseling, they find the food pyramid easy to follow and a useful tool.

Attached is a sample of the revisions and additions that I incorporate in my practice. I hope that this information **will be beneficial toward improving the food pyramid.**

Please contact me by phone, fax, or e-mail for any questions:

OFFICE PHONE#: _____
MOBILE PHONE# _____
FAX #: _____
E-MAIL: _____

Sincerely,

Marcy M.R. Rabinowitz, MA, RD

Cherry Hill, NJ

FOOD GUIDE PYRAMID

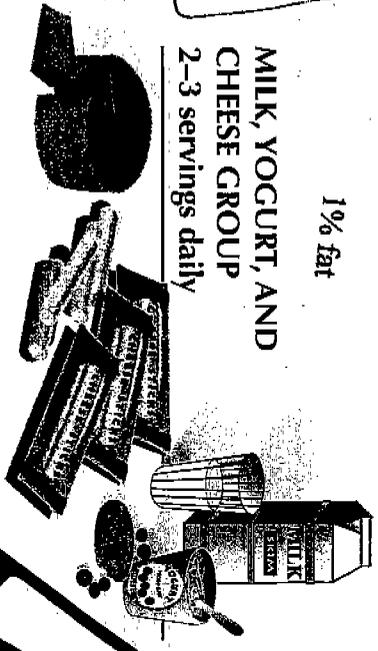
*exercise extra 1/2 hour before eating 1/2 cup of sweets

FATS *avoid
SWEETS or use sparingly
 *avoid shellfish

*avoid shellfish

1% fat

MILK, YOGURT, AND CHEESE GROUP
 2-3 servings daily



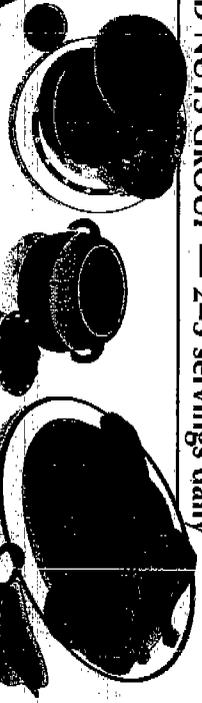
low fat
 no added sugar
 ice cream

Olives,

Cream cheese,
 Peanut butter

1 Tbsp.

MEAT, POULTRY, FISH, DRY BEANS, LENTILS, AND NUTS GROUP — 2-3 servings daily



milk—1 cup
 yogurt—1 cup
 natural cheese—1 1/2 oz
 processed cheese—2 oz

1 egg*
 nuts—1/2 cup*
 cooked, dry beans—1/2 cup*
 cooked lean meat, poultry, or fish—4 oz
 egg subst—2ozs.
 *Count as 1 ounce of meat

VEGETABLE GROUP—
 3-5 servings daily



8 oz. vegetable juice

cooked or chopped raw vegetables—1/2 cup
 raw leafy vegetables—1 cup

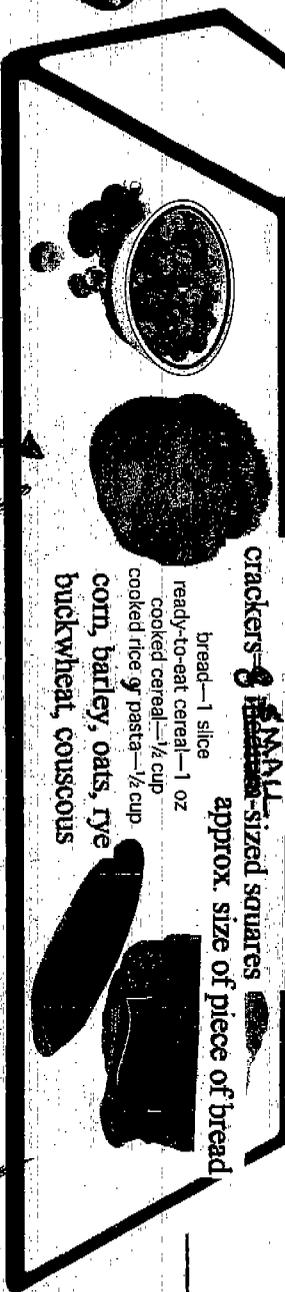
Choose: 1 green, 2 red, yellow, orange

juice—3/4 cup
 dried fruit—1/2 cup
 chopped, raw fruit—1/2 cup
 canned fruit—1/2 cup
 1 medium-size piece of fruit, such as banana, apple, or orange

FRUIT GROUP — 2-4 servings daily



corn, barley, oats, rye
 buckwheat, couscous
BREAD, CEREAL, RICE, AND PASTA GROUP—
 6-11 servings daily



crackers—8 small-sized squares
 bread—1 slice
 ready-to-eat cereal—1 oz
 cooked cereal—1/2 cup
 cooked rice or pasta—1/2 cup

approx. size of piece of bread

corn, barley, oats, rye
 buckwheat, couscous

airpopped popcorn

pretzels

baked corn chips

QADAR 1998.

8oz. by volume

Source: National Center for Nutrition and Dietetics
 The American Dietetic Association
 Based on the USDA Food Guide Pyramid

Rabinowitz 3045

How many servings for you?

	Less active Women, Older Adults	Children, Teen Girls, Active Women, Less Active Men	Teen Boys, Active Men	Young Children, 2 to 6 Years
Calories	About 1,600	About 2,200	About 2,800	About 1,500
Bread Group	6	9	11	6
Vegetable Group	3	4	5	3
Fruit Group	2	3	4	2
Milk Group	2-3*	2-3*	2-3*	2
Meat Group	2 for a total of 5 ounces	2 for a total of 6 ounces	3 for a total of 7 ounces	2 for a total of 4 ounces

*Women who are pregnant or breast-feeding, teenagers and young adults to age 24 need three servings.

Notes:

Rabinowitz 4 of 5

AVOID CONCENTRATED SWEETS: sugar (mainly sucrose) and syrups when listed as 1st, 2nd, or 3rd ingredient on a boxed, frozen, canned, or packaged item.

ALLOWED: 100% juices (fructose sugar) and 100% milk (lactose sugar) in dairy products.

NUTRITION LABELS:

low sugar----less than or equal to 5 grams/serving

low fat-----less than or equal to 5 grams/serving

low cholesterol----less than or equal to 25 mg/serving

low sodium----less than or equal to 300 mg/serving

2000 cc=2 liters=2quarts=64 ozs.= 8-8oz. cups (non-caloric liquid)

(Rabinowitz) 5/8/5

MEAL PATTERN

	B	AMNX	L	PMNX	S	NTNX
<u> </u> % DAIRY						
PROTEIN (LEAN/ LOW FAT)						
GRAINS						
VEGS						
FRUITS						
FATS						

- key: --- means no choice from the food group
1 means one serving size/choice from the food group
2 means two serving sizes/choices from the food group
3 means three serving sizes/choices from the food group

PATIENT'S NAME: _____
DATE: _____
DIET PRESCRIPTION: _____

Marcy M.R. Rabinowitz, MA, RD
Clinical Nutritionist

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Dr. Walter Willett
Food Guide Pyramid Reassessment Team,
USDA Center for Nutrition Policy and Promotion,
3101 Park Center Drive, Room 1034,
Alexandria, VA 22302.

AUG 16 2004
[Signature]

August 12, 2004.

Dear Dr. Willett:

Based on decades of bad advice, Americans have steadily accumulated more and more trans fats into their cell membranes. These abnormal membranes are permanently a part of our bodies at some level, a legacy of greed, bedeviling cardiologists, diabetes experts, and MediCare actuaries. Such is the mischief of bad food advice. So I am delighted that the government is re-visiting the 'Food Pyramid', which, while ignored by most adults, does affect all children in school food programs. I am writing for the children.

I read with consternation the following comments attributed to you by Ms. Marilyn Marchione of the Associated Press: "There are many concerns with eating diets high in animal fat. If people do want to cut back on carbohydrates, it's really important to do it in a way that emphasizes healthy fats, like salads with salad dressings."

I worry about your comments because more than eighty-percent of my caloric intake is derived from animal fat: meats, organs and dairy products such as whole milk, butter, cheeses, cream and eggs. The other twenty-percent come from nuts, fruits and vegetables. I do not watch my total caloric intake; I eat everything I find tasty, and let my appetite be my guide. Lest you think I am in poor health, I should tell you that I am sixty years old, not on any prescription medication, and have regular check ups, including normal laboratory tests, stress treadmill EKG, etc. I am five-eight, one hundred and fifty-one pounds. I bench press my own weight, and just completed a 26.2 mile marathon.

Like you, I am concerned about 'healthy fats'. Unlike you, I worry less about the fat in my grass-fed meat diet, and more about processed and rancid oils. I am concerned about the quality and type of all fatty acids and cholesterol that I ingest. I only eat meats of animals that are well cared for, vegetables that are organically grown, raw milk and dairy products that have not been pasteurized and homogenized, foods with no hydrogenated fatty acids whatsoever, and of course, no soy derivatives that are not fermented. In short, I have reviewed the design, methods, and raw data of the growing body of scientific work reflected in the nutrient rich traditions promulgated by the Weston A. Price Foundation, and find them unimpeachable. To paraphrase Franklin D. Roosevelt, more and more Americans are discovering that if they eat a diet respectful of traditional processes, they have nothing to fear, save the irrational fear fostered on them.

For your new 'Food Pyramid', may I humbly suggest that you warn against (1) all improperly handled fatty acids (rancid olive oil and meats with trans fat included), (2) all milk products with abnormal cholesterol (which means no homogenization), and (3) all soy products that are not pre-fermented. The edible oil, milk and soy industries may not thank you, but the children will, once they grow up and realize that they are healthy adults because they were not lied to as children.

Yours truly,

[Signature]
A. C. Shen

Berkeley, California.

AUG 16 2004

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Weathers 1 of 2

[Handwritten initials]

August 12, 2004

Chapel Hill, NC

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy & Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear Sir/Madam

Thank you for the opportunity to provide input to the redesign of the single most important instrument for people's physical health. This opportunity has afforded our family a lively discussion among parents and our 16 and 11 year-old sons. As you will see from the attached suggestion from our youngest member, we "lean" heavily toward adoption and encouragement of a heavily vegetarian diet. We wish you luck in your efforts.

Yours truly



John Weathers

(Father of 11-year-old son's attached proposal, **Scott Weathers**)

Weather's Fox

Most meats are ~~high~~ high in fat, You saturated fat, cholesterol, and calories. The main vitamin you get from meat is protein. You can find protein in nuts, tofu, tempeh, and beans. A vegetarian diet will probably help you lose weight, without being unhealthy.

A Vegetarian

Diet

The vegetarian benefits for everyone.

Total

A vegetarian diet is not only more healthy for you than a meat eating, but better.

The Environment

Meats take lots of water to create from watering the oats to cleaning the meat. Veg. only have to be watered. The animal wastes can cause massive air and water pollution. Cows that graze cause erosion and landslides.

The Animal

Animals in factories usually live a fraction of their normal life and live in horrible conditions. The animals are killed in the cheapest way possible which is almost always very painful.

PROPOSAL FROM SCOTT WEATHERS

Sharon Morr

Delta, Ohio
August 9, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy & Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom It May Concern:

I am writing to share my thoughts on the USDA Food Guide Pyramid. I am very committed to following a healthy lifestyle, and have used the Pyramid to guide my food choices for many years. My comments are based on this experience.

Eating choices are only one part of obtaining your maximum health. Regular physical activity and stress management are equally important. I have always tried to have balance in my life. However, as I got older, I found myself unable to keep my weight in a normal range no matter what I did. I also found that I was always hungry.

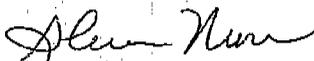
It wasn't until I began to follow a program of controlled carbohydrate consumption that I finally began to gain control of my eating. Years of eating the recommended servings of grain products (mostly whole grain) seemed to only fuel my appetite. Even with regular exercise, I wasn't able to keep my weight in the normal range. I also felt tired most of the time.

I assumed that this was an inevitable part of going through menopause and that I would just have to "live with it". I wasn't morbidly overweight, but I was very uncomfortable with my body. Diabetes runs in my family and I was also fearful that I would be next.

I am pleased to say that by controlling my carbohydrates, I am now in a normal BMI range and my recent fasting blood glucose was 87. My lipid profile was the best it had ever been. My HDL has gone from the high 30's and low 40's to 51. My triglycerides are below 100 and my TC/HDL ratio is 3.8.

It's great to have good numbers, but just as important is that I feel better. I have been controlling my carb intake for almost 2 years and I plan to do it the rest of my life. I hope that you will take my comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,



Sharon Morr

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Morr 1 of 1

AUG 16 2004
[Signature]

Peter Lavoie

West Hartford, CT
August 10th, 2004

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Lavoie 1 of 1

AUG 16 2004

[Handwritten initials]

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom it May Concern,

My name is Peter Lavoie and I'm writing to share my thoughts on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to regain control of my health and my weight.

Since adopting a low-carb lifestyle, I have lost 85 pounds, and I am still losing. I am now about 20 pounds away from my ideal body weight for my height, and I feel better than I have in years. I feel in control of my weight now, and anticipate reaching my goal within the next year. I have been following the low-carb plan as outlined by Doctor Robert Atkins. In the past I have followed the USDA Food Pyramid's recommendations, and I have gained weight. Since adopting the Atkins lifestyle, I have lost weight, and feel much better.

My comments are as follows:

Since starting the Atkins Lifestyle, I have felt better, been more energetic, and overall have improved my health. I think more research is needed on this lifestyle, and that the food pyramid should reflect that this lifestyle might be as good, if not (as in my opinion) better than the current one. I believe the Atkins pyramid is a more accurate guide to proper nutrition, as well as a way of life, and would like to see changes made such to incorporate this lifestyle. It seems the epidemic of obesity is skyrocketing. As a formerly morbidly obese man, who has succeeded for over a year with the Atkins lifestyle, I wholeheartedly recommend the Atkins approach, and hope to see it reflected in the new Food Guide Pyramid.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,

Peter Lavoie

Peter Lavoie

AUG 16 2004

James & Eleanor Talich

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Talich/10x1

8 August 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To whom it May Concern,

I have heard that there is an effort underway to reevaluate the USDA Food Guide Pyramid. The Pyramid and associated literature will have far-reaching impact on the direction we go with nutrition for years to come. I have been a part of the obese epidemic and have recently discovered what I believe to be the cure. My wife and I urge you to emphasize the merits of a controlled carbohydrate diet with exercise. If you have the time, our recent experience may be helpful.

We are in our early sixties and have been battling our over weight problem for the past 30 years. We have tried many diets and tried lots of weight loss programs. Recently we have been developing symptoms typically related to obesity – hypertension, blood sugar out of control, and several others. Even with our doctor's concern and treating the symptoms, we had not made a connection between the health problems and the excess weight. The typical medical opinion is that "you should loose some weight", but no advice on how to do it. Several weeks ago we discovered a nutrition program that has been around for quite some time, has had good clinical success, and is grounded in good science. We decided that the number one priority is not the hypertension, or the heart arrhythmia, or the other symptoms, but the excess weight. Since that time my wife and I have been on a controlled carbohydrate plan and have each lost 15 pounds. I have another 35 pounds to go to get to my target weight of 185 pounds. But the amazing thing is that in this short time there are no more blood sugar symptoms, the arrhythmia is gone and I have been able to reduce my hypertension medication. I expect to be able to eliminate my medication entirely in the next few months.

There is considerable evidence in clinical experience and other studies that there is a direct connection between the sugar and carbohydrates that we eat and serious problems including obesity, type II diabetes, hypertension, and heart disease. Since the early 19th century we have increased our consumption of sugar 10 times – and our health problems are directly linked to this change in diet. Our bodies were not created to cope with the excess sugar and refined carbohydrates typical in our modern Western diet.

Our diet is important. Correcting our advice on diet has the potential of eradicating the obesity epidemic and eliminating the associated health problems of millions of people.

Sincerely,
James R Talich
Eleanor E Talich

James R. Talich
Eleanor E. Talich

AUG 16 2004

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JP

August 11, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Homann / of 4

Dear Food Guide Pyramid Reassessment Team:

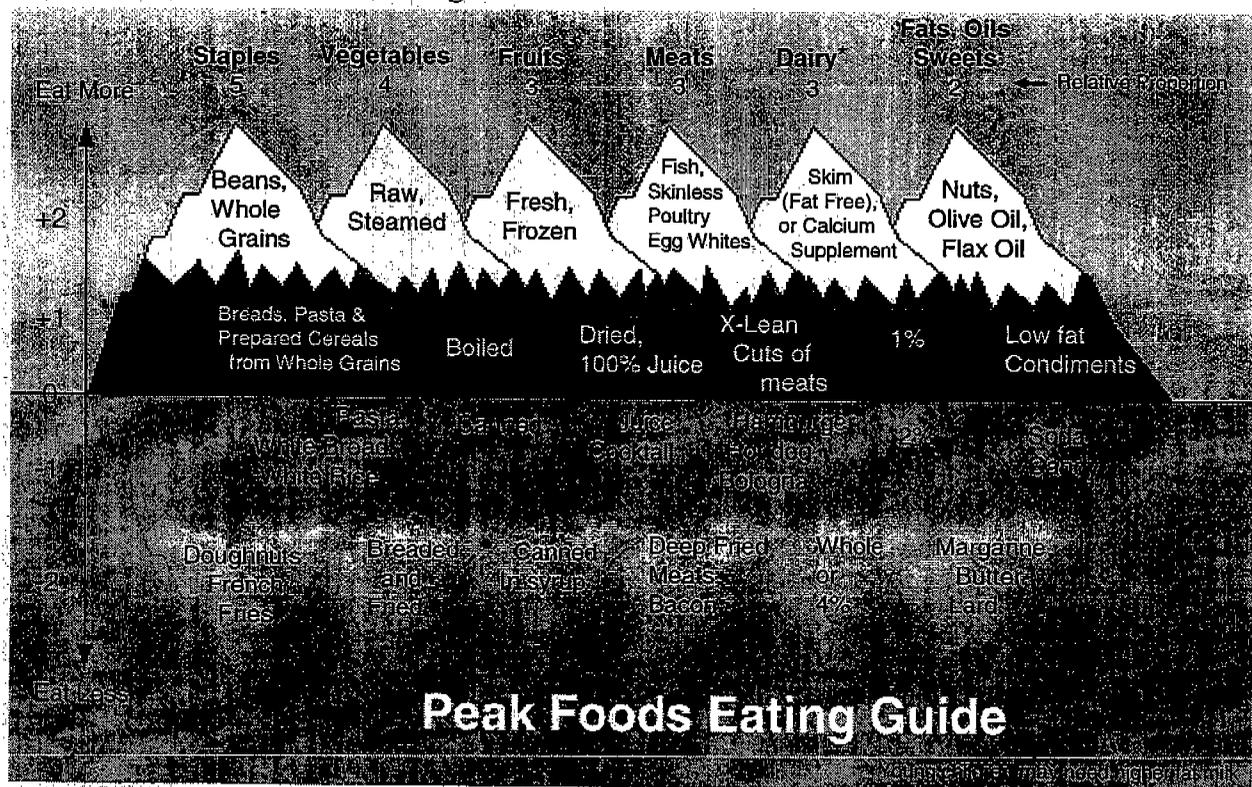
I do not envy your task. Your revision of the Food Pyramid will be received with much scrutiny upon its release. Between food industry lobbyists, health professionals, and advocates of low carb, low fat, vegetarian and numerous other dietary preferences, it will be difficult to create something that is reasonably well received. The new model must also be an improvement over the current Food Pyramid, be easy to use, and reflect the current knowledge in nutrition.

I think I can help. What follows is my proposal for the graphic to replace the Food Pyramid. I believe my suggestion not only resolves many of the problems of the Food Pyramid, but also would be fairly acceptable to most of the interested parties. Last November, I presented a proposed revision of the Food Guide Pyramid at the American Public Health Association conference in San Francisco. Since then, I have further improved upon the idea, which I have named the "Peak Foods Eating Guide." In the remainder of this letter, I will first present my proposal and then I will explain how it rectifies the major criticisms of the Food Guide Pyramid.

The Peak Foods Eating Guide

Imagine you are looking at a mountain range with its reflection on a lake in front of it. Each peak is a category of food. The higher up on the mountain, the healthier a food is for you. Any food above the water line is a good choice. Foods below the water line should be minimized; the farther below the water line, the worse it is for you. To improve your diet, simply substitute foods higher up the mountain for those that are lower. A potential slogan to accompany the graphic could be: "Eat foods higher up the mountains for peak health."

Figure 1: The Peak Foods Eating Guide



Peak Foods Eating Guide

The Peak Foods Eating Guide is an outline of principles for healthy eating. It emphasizes the healthfulness of foods eaten within each category. It also emphasizes eating foods from a variety of categories each day.

1. Choose foods as high up the mountain as possible.
2. Minimize foods below the waterline.
3. Choose foods from each category each day. A good rule of thumb for proportions would be 5:4:3:3:3:2 or 5 servings of staples to 4 vegetables, 3 fruits, 3 meats, 3 dairy and 2 fats, oils & sweets. Since it adds to 20, in percentages it would be 25:20:15:15:15:10.
4. Try to maintain a positive point total for foods eaten in each category. Each portion of a food you eat counts +2, +1, -1, or -2 points. Add the points for the foods eaten in each category. Try to have a positive number in each category each day.

The foods in each category in the Peak Foods Guide are slightly different than in the Food Guide Pyramid and are as follows:

Staples: Foods in the staples group are starchy foods such as grains, rice, corn, dry beans, potatoes and foods made mostly from these products such as bread and pasta.

Vegetables: Vegetables include green leafy vegetables, orange/yellow and cruciferous vegetables.

Fruits: Fruits include bananas, apples, citrus, grapes, etc.

Meats: Meats include animal flesh and eggs. Vegetarians would not use this group and choose high protein foods from other categories, such as beans and nuts.

Dairy: Milk products including milk, cheese, and yogurt. It does not include butter, which is in the fats, oils and sweets category.

Fats, Oils & Sweets: Sugars, oils, fats, condiments and nuts are in this group as well as foods that are made up mostly of these items such as candy and soda pop.

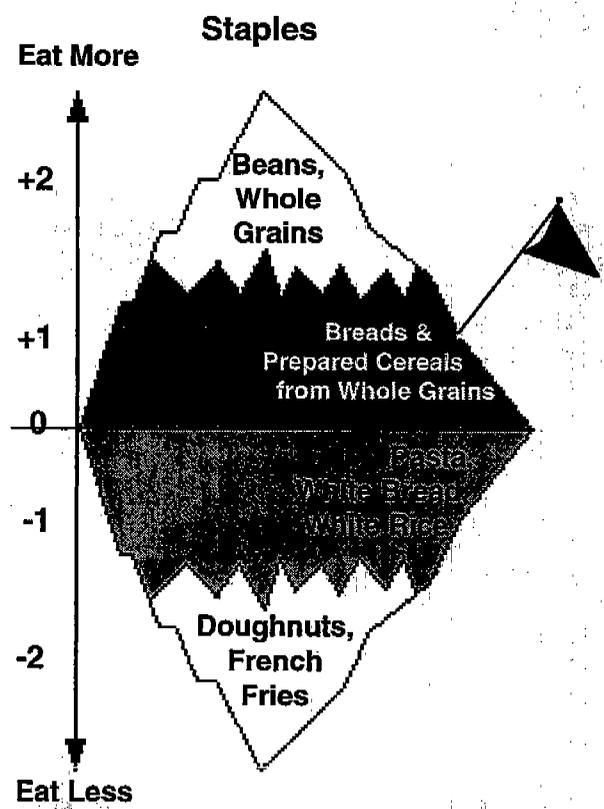
Categorizing Individual Foods

The point value examples of foods on the main graphic are general rules that apply to most foods, but points for individual foods (-2,-1,+1,+2) would be determined independently. For example, unsalted natural peanut butter may count as a +2, but peanut butter that has been hydrogenated for stability and contains added salt and sugar may count as a -1.

Individual food labels would have the grouping (mountain) of that food, along with a flag showing the point value (healthfulness) of that food. This would make it simple for the consumer to make better choices by choosing the alternative with the higher flag placement (point value) or looking for foods with flags in the positive range as in the example to the right (Figure 2).

An algorithm would have to be developed to determine the point value of individual foods in an objective manner. Although I have not created one yet, I anticipate that each category would have a separate algorithm and that there would be several weighted variables used to determine each.

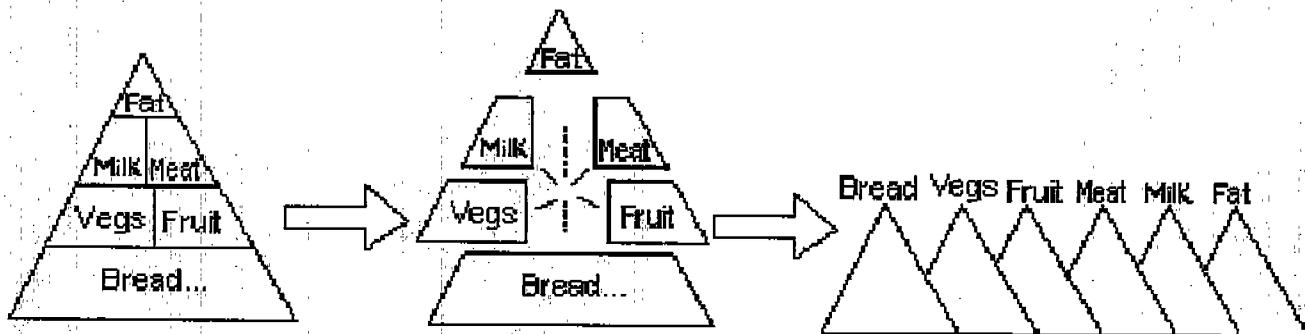
Figure 2: Individual Food Label



Development of the Peak Foods Guide and Reasons for Changes

A major point of confusion for consumers is the proper balance between the macronutrients (Should we be eating a low fat diet or a low carbohydrate diet?). The current Food Guide Pyramid is heavily weighted toward carbohydrates and away from fats. Instead of making a stand on this issue, I suggest that trying to determine the optimal ratio of fat, carbohydrate and protein in the diet is answering the wrong question. Macronutrient balance can vary considerably and still be a healthful diet. For example, depending on a number of variables, a diet can be quite healthful with fat ranging from approximately 10 to 40 percent of calories. Clearly, there is no "right" answer to this question. A better question would be, "What *type* of fats, carbohydrates and proteins are better and worse choices?" This points to the need to distinguish between better and worse choices *within* a food grouping. The first step in changing the Food Guide Pyramid was to change the focus away from macronutrient balance (see Figure 3).

Figure 3: Change the focus of the food guide away from macronutrient balance

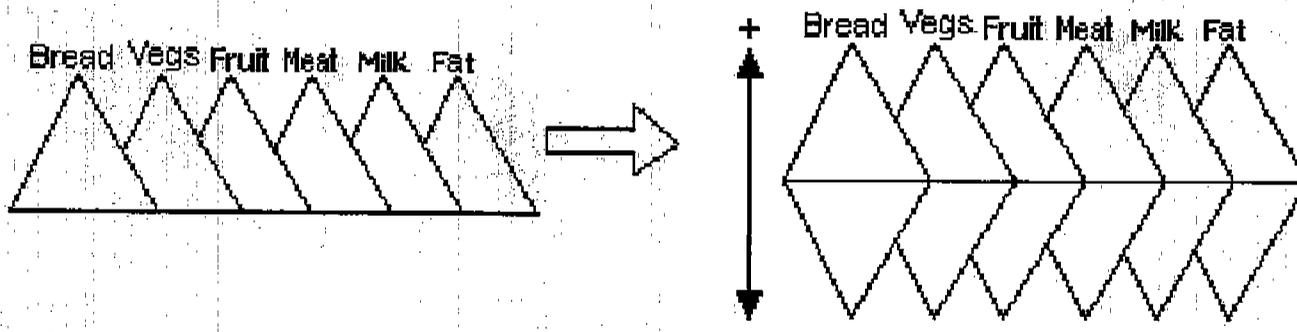


The lack of distinction between better and worse choices within a good grouping is one of the major criticisms of the Food Guide Pyramid. Michael Jacobson, the Executive Director of the Center for Science in the Public Interest said the problem with the Food Guide Pyramid "is that it fails to distinguish between better and worse foods within a food group." As a result, it is possible to follow the Pyramid and still have a diet detrimental to health. The research on institutional diets I presented at APHA in November demonstrates this point. Others, such as McCullough, et al (Am J Clin Nutr 2002;76:1261-71), have made a similar point.

The next issue involves ease of use by the consumer. The very reason the Food Guide Pyramid reassessment and update was undertaken was to ensure "that consumers can understand and apply its messages." The current Pyramid has failed in this objective. As my own research demonstrates, institutions do not necessarily apply the Pyramid to their menus in a healthful way. In addition, the current Food Guide Pyramid does not help the average person make better choices. If a person with a cart full of groceries were asked to substitute healthier foods for less healthy foods in their cart using the Food Pyramid, they would be unable to do so. The Pyramid encourages people to have more of some categories of food, but not in better alternatives for their choices. It is not instructive in helping people replace canned fruit with fresh fruit or replace white bread with whole wheat bread, for example. As the Harvard team states, "The primary goal of a food guide graphic should be to convey which foods should be emphasized and which should be minimized for optimal health." Thus, the new graphic needs to help people choose better *alternatives* for the foods they normally eat.

Another way to make the graphic more intuitive to consumers is to put the better choices at the top. The current Food Pyramid entreats people to choose more of the bottom. This is counter to American culture, which pushes us to reach for the top, aim high, etc. The new graphic could easily be modified to accomplish this as can be seen in step two (see Figure 4).

Figure 4: Emphasize better food choices *within* groups & put the better choices on top



Some foods need to be shifted into different categories to better reflect their actual function. I suggest changing the "bread, cereal, rice and pasta group" to be called "staples." This group would include all the foods in the original group, but would also include other starchy foods such as potatoes, corn and dry beans. Also, I moved nuts into the "fats oils and sweets" category where it receives a more positive emphasis and becomes one of the more preferable sources of dietary fat.

Finally, the "servings" in the current Food Pyramid bear no similarity to the portions most people eat. In addition, portion size varies greatly from person to person. Instead of obsessing over absolute amounts, the food guide graphic should help people select the relative proportions and types of foods that create a healthy diet. Since energy intake and expenditure cannot be calculated with enough precision, even by professionals, to be useful, I suggest we encourage variety, proportion and better choices—and leave calorie counting outside of the new food guide. Remember, the purpose of the graphic is not to be a stand-alone guide. Institutions would use the more specific guidelines accompanying the graphic, but the average consumer simply needs the basic message of choosing higher quality foods from each category in reasonable proportions. The Peak Foods Eating Guide seen in Figure 1 on the first page of this letter is the result and incorporates all the above changes.

Conclusions

The Peak Foods Eating Guide improves upon many of the weaknesses of the current Food Pyramid. It also would be fairly acceptable to most of the food industry since it generally does not exclude types of food but calls for healthier versions of the foods. Most importantly, it would also be easier for consumers to apply appropriately than the current Pyramid. There are certainly a few items in the Peak Foods Guide that are open for debate such as what foods are the best exemplars of different point values, but overall, I think the concept is a good one and is a great model to work from. I hope you will consider my suggestion.

Sincerely,

Gary P. Homann

Gary P. Homann, M.A.
University of Wyoming