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Nutritional Resource Foundation

Manitowoc, WI

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August 26, 2004

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

Dear Team:

Subject: Proposed changes to the Food Pyramid

We petition that all references to foods that contain bleached, enriched white flour be removed from the Food Pyramid. Being a major contributor to obesity makes enriched flour an undesirable ingredient in the American food supply. Bleaching and removing wheat germ from wheat is totally unnecessary. Adding B-vitamins and minerals to unbleached, wheat germ rich wheat flour would be desirable.

The FDA has done very good research on flax and has shown its many health benefits. Other research in the last 15 years has confirmed these results; therefore, we think flax with its high omega-3 content should be listed as one of the whole grains.

The Food Pyramid should contain a recommendation for at least 5 servings per day of whole grain foods. Each whole grain food must contain at least 3 grams per serving of total dietary fiber and no trans fats, no enriched white flour, and no high fructose corn syrup or corn syrup.

Sincerely,

Paul A. Stitt

Paul A. Stitt
Trustee

PAS:jck

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The SCHWAN FOOD COMPANY™

August 26, 2004

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

RE: Notice of Proposal for Food Guide Graphic Presentation and Consumer Education Materials

Dear Sir or Madam:

The Schwan Food Company welcomes the opportunity to comment on the proposed design and implementation of a new food guidance system, as outlined in the *Federal Register* notice dated July 13, 2004.

By way of introduction, Schwan is one of the largest branded frozen food companies in the world. The company employs more than 25,000 people in the processing, manufacturing, transportation, distribution and sales of frozen foods nationally and internationally.

Our comments are focused on the six key issues and questions outlined in the proposal.

1. **Retain the current Food Guide Pyramid or implement a new graphic.** Since its introduction in 1992, the Food Guide Pyramid has received broad coverage by the media, by health professionals and trade organizations, by schools and by the food industry. Pyramid recognition is high among children, teens and adults of all ages. The International Food Information Council (IFIC) indicates nearly 88% of US consumers recognize the Pyramid and understand the overarching messages it conveys. Unfortunately, most of the population fails to adhere to the principles outlined in the Pyramid brochure.

   However, Schwan believes the current Pyramid can be improved with some modifications and additions. Schwan recommends modifying the serving size information depicted in the Pyramid to be consistent with Nutrition Facts Panels. Schwan recommends adding pictorial information concerning the need for physical activity to balance energy intake. This information can help illustrate the distinction between various life stages. The Pyramid should reflect the difference between the energy needs and activity level of a typical school-age child versus that of a sedentary, middle aged adult. This information could be paired with guidance on the

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appropriate number of servings of each food group for those who are trying to maintain a healthy weight or lose weight. Because most consumers seek simple ways to guide food selection, it will be essential to provide communication messages that recognize a variety of eating patterns and take into account ethnic influences and lifestyles.

Messages that link taste and health to a wide variety of foods give consumers greater flexibility in personalizing the Pyramid to their individual needs. Real meal examples can help consumers recognize that they can create satisfying meals that are nutrient dense. For example, a meal can include pizza, a garden salad and fruit for dessert or a stir-fry dinner with vegetables can be topped off by a serving of ice cream with fresh fruit.

2. **Develop messages that enhance awareness and motivation to achieve a healthful diet.** The messages you create can be as powerful as the graphic of any food guidance system. Industry has learned that successful brand marketing is the result of extensive consumer research. It is imperative that research be conducted to identify meaningful, motivational messages that meet today's diverse lifestyle needs while addressing age-specific consumers, and the demographics of the US population today.

   Because individuals go through various stages of change as they manage personal health and nutrition issues, the educational communications you construct need to build upon the core motivational messages. Messages should feature real life scenarios: single head of household families, families with both parents working, parents taking care of parents. Messages should consider the needs of children: 2 – 5 years old, teen-age girls, middle-age women and men, seniors; and include fair ethnic representation with Hispanic, Latin Americans, Black Americans, Asians, etc. Finally, we recommend that messages communicate the value of family meal time. Recent research by Dr. Mary Story and colleagues at the University of Minnesota (*Archives of Pediatrics and Adolescent Medicine*, August 2004) supports earlier findings that children who share mealtime with their family are more likely to be a healthy weight, to have more appropriate nutrient intake, and to perform better in school, and are less likely to smoke or use illegal drugs and alcohol.

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3. **Individualize guidance versus develop generalized messages.** As noted in the *Federal Register*, with respect to nutrition guidance, one size clearly does not fit all. Most educators will agree that health and nutrition messages are more meaningful and sustainable when consumers are able to personalize them. It will be important to recognize the wide variety of current food consumption patterns before creating messages designed to enhance the nutritional value and healthfulness of the diet. Including experts in social marketing in message development will increase the likelihood the messages will reflect the knowledge that changes in food habits may begin slowly with small steps.

4. **Focus on core messages in contrast to using graphics to represent educational messages.** The Schwan Food Company believes the graphic and educational messages you develop should be clear and concise. Creating core educational messages can augment graphics and help consumers understand and adopt new habits. Core messages should link the importance of portion size with the individual's unique nutrient and energy needs. However, testing consumer perception of such messages is essential.

5. **Identify the key components for effective interactive education tools.** Educational tools should include: videos, website, science-based interactive games, visual graphics, age-specific and multi-lingual messages. Consumer research can help determine the best options for the most effective educational tools.

6. **Identify the best channels of delivery for the Food Guidance System.** Schwan believes the best channels of delivery are: schools, colleges, worksites, trade associations, media – both print and advertising and food manufacturers. In reference to the statement that "Partnerships ***may*** (emphasis added) be sought with nutrition, health, and education organizations; trade associations; Federal, state, and local government agencies; and food companies," The Schwan Food Company requests that CNPP ***plan*** to partner with food companies, which can, after all, reach many consumers through their food packaging, advertising, and consumer education materials. To overlook or not involve such a powerful resource in conveying a new food guidance system would be short sighted.

Examples of how The Schwan Food Company has already provided dietary guidance to consumers include CD-ROMs with games teaching the Food Guide Pyramid – available for day care children and grades 1 – 3; newsletters that address Key Nutrients, Food Guide Pyramid and Activity Pyramid, Healthy Snacks for summer time and the Importance of Family Meal Time, etc. The newsletters are sent to school food service directors, include references to the scientific literature, and provide a parent version that is downloadable in English or Spanish. Schwan has found the schools to be very receptive of these newsletters, and the number of school districts that download the parent version to send home has been increasing steadily.

Thank you for the opportunity to comment on this important issue.

Respectfully submitted,

Hope S. Hale

Hope S. Hale, MS, RD, CD
Principal Nutrition Scientist

U.S. Canola Association

Washington, DC

Tel:
Fax:

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August 26, 2004

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

Re: Docket ID fr13jyo4-34

The U.S. Canola Growers Association (USCA) is pleased to respond to comments solicited in the July 13, 2004, *Federal Register* regarding the Food Guide Pyramid. Enclosed is a paper entitled, "The Need for a Minimum Healthy Fat Intake," which supports our responses to specific questions posed by the Center for Nutrition Policy and Promotion (CNPP).

Advantages of retaining the current shape of the Food Guide Pyramid include the fact that it has visibility among American consumers and that its pyramid shape well represents intake ratios of food groups. Using food images and other graphics in the Pyramid is an effective way of communicating with the public. However, the top of the Pyramid needs to differentiate among different types of fats, namely between healthy *cis*-unsaturated fats and unhealthy saturated and *trans* fats.

One way to do so would be to divide the top section of the Pyramid, with the very top illustrating an upper limit of unhealthy saturated and *trans* fat intake and the lower portion depicting an appropriate intake of healthy unsaturated fats. Common food sources of the latter fats could be used as images, similar to other images in the Pyramid, or they could be represented by simple graphics, like squares with a definition in the key. Currently, all fats are represented by circles in the Pyramid. The circles should represent either healthy or unhealthy fats and another shape, like squares, should represent the opposite, and defined accordingly in the key. For example, *cis*-unsaturated fats could be represented by squares, saturated and *trans* fats by circles, and added sugars by triangles. Common sources of fats and added sugars should accompany the key or other definitions. If the top section of the Pyramid were to remain undivided, unsaturated fats (squares) should predominate.

An alternative shape to the Pyramid would be a pie chart, indicating recommended daily servings or percentages of different food groups as represented by food images in slices of the pie. Such a chart may better indicate recommended ratios or percentages of daily caloric intake per food group. But regardless of the shape of the graphic, the message about healthy versus unhealthy fats should be incorporated.

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The USCA supports the NCPP's proposed use of a graphic and slogan as motivational/awareness elements as well as the educational components proposed in the *Federal Register* for the food guidance system. However, the daily food intake patterns and core messages should be amended to differentiate between unhealthy and healthy fats. The USCA believes the proposed upper limit for added fats within the caloric goal for each food intake pattern should be specific to unhealthy fats and recommends the addition of a minimum intake for healthy unsaturated fats. USCA also calls for the purposeful increase of the essential fatty acid alpha-linolenic acid (ALA) in the diet, which is found in a few plant-based oils like canola oil. ALA is more difficult to obtain in the diet than the other essential fatty acid, linoleic acid (LA), which is found in many plant-based oils. Current research suggests that ALA, converted into longer chain omega-3s in the body, has cardio-protective effects.

The existing food guidance messages are appropriate as general messages with one exception: the type of fat matters as much as the amount of fat consumed. Consumption of unhealthy saturated and *trans* fats should be as low as possible, while healthy unsaturated fats should be consumed in moderation. USCA agrees with the CNPP's recommendation to lower intake of saturated fats, *trans* fats, and cholesterol, but supports substituting these unhealthy fats with healthy unsaturated ones. In addition, the USCA recommends the following changes to the existing Dietary Guidelines for Americans as they pertain to fats, oils, and fat consumption:

- In the "Build a Healthy Base" section, under the guideline "use plant foods as the foundation of your meals," the NCPP recommends that consumers "go easy on foods high in fat." The USCA believes the latter should specify foods high in saturated and *trans* fats.

- In the "Choose Sensibly" section under the definition of unsaturated fats, the USCA notes that canola oil is also a good source of polyunsaturated fats, including the omega-3 fatty acid ALA. In fact, canola oil has the highest amount of ALA of any commonly available vegetable oil in the marketplace.

- Under fats and oils in the same section, the NCPP advises consumers to "choose vegetable oils rather than solid fats (meat and dairy fats, shortening)." The USCA believes that this should be amended to "choose vegetable oils high in unsaturated fat" with the additional recommendation of using such oils for baking, frying, cooking, and other methods of food preparation where animal or solid fats may be used instead. USCA agrees with the current recommendation to keep total fat intake moderate with an emphasis on eating primarily unsaturated fats instead of saturated and *trans* fats.

- Under "Advice for Today" in the "Choose Sensibly" section, the USCA recommends specifying the use of vegetable oils high in unsaturated fat or low in saturated fat as a substitute for solid fats and partially hydrogenated shortenings. Not all vegetable oils are created equally. In fact, some contain significant amounts of saturated fat. USCA agrees

with the use of the Nutrition Facts Label to help choose foods lower in total fat, saturated fat, and cholesterol, but calls for the addition of unsaturated fats to the label to help consumers differentiate between unhealthy and healthy fats in food products.

As the NCPP notes, "one size" does not fit all for nutrition guidance. However, it is advantageous to have a single graphic that symbolizes healthy eating and carries universally important dietary messages like the Food Guide Pyramid. Similar to the existing Pyramid, the 2005 graphic should continue to be used as both a symbol and educational tool. However, many consumers do not grasp specific concepts, such as serving sizes and recommended daily caloric intake for their body mass and activity level, by viewing the Pyramid alone. This underscores the importance of accompanying educational materials.

Offering separate Food Guide Pyramids for adults and children is useful. Beyond these two major groups, however, it may be difficult to individualize dietary guidance with a single graphic. Offering more than one graphic for adults, for example, may be confusing. Accompanying educational material, however, can target subgroups of adults, as the NCPP proposes for 2005, based on age, sex, and activity level.

The Food Guide Pyramid for Young Children includes illustrations of children engaged in active pursuits to show the importance of physical activity. A visual representation of exercise in the adult Pyramid may be useful to remind Americans of the need for physical activity.

The USCA advocates the use of multi-media outreach to consumers with food guidance materials. The development of interactive online educational tools that can be customized to individuals based on age, sex, activity level, and health risk factors might be useful. An effective interactive tool is one that can be individualized, offering more specific information than the Food Guide Pyramid and core messages alone. The USCA strongly recommends revising the Pyramid and messages to support a minimum intake level of healthy unsaturated fats.

Internet-based and print educational materials are most accessible to educators and consumers. The Internet offers economic advantages, while rapidly reaching millions of Americans round the clock. However, print materials, and perhaps even a televised Public Service Announcement, should be used to reach people without access to the Internet. Partnering with nutrition educators, related associations, and university and government extension offices to disseminate print materials will be very helpful.

Thank you for your consideration of these comments.

Respectfully submitted,

Paul Tyler

Paul Tyler, President
U.S. Canola Association

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The Need for a Minimum Healthy Fat Intake

Canola Oil: A Golden Opportunity for the Nation's Health
August 10, 2004

EXECUTIVE SUMMARY

Congress enacted protection for consumers as part of the Nutrition Labeling and Education Act of 1990 (NLEA) that required the U.S. Food and Drug Administration (FDA) to mandate disclosures by manufacturers about the nutritional value of purchased foods. The mandatory disclosures include specific statements about the amount of each essential or well-established nutrient in each serving size of an offered product in a Nutrition Facts part of the label. Thus, there is mandatory disclosure of the exact amount and percentage in relationship to a daily diet of each healthy or required nutrient with the solitary exception of *cis*-polyunsaturated fat.[a] Alternatively, if the food product does not contain a required nutrient, there must be a specific disclosure of that absence. The required information on a food label also includes mandatory disclosures about the presence, in a purchased food, of substances generally viewed as unhealthy when consumed in excess amounts, such as saturated fat, cholesterol, sodium, and recently, *trans*-unsaturated fat. In sum, the consumer reading the Nutrition Facts panel is entitled to know the amount per serving and percent Daily Value of each essential or beneficial nutrient and also each potentially unhealthy substance in a food product.

However, in implementing this mandate, FDA made one omission. There is no required disclosure about healthy or essential fatty acids in the Nutrition Facts panel. All current declarations about the amount or percentage of minimum daily needs of *cis*-unsaturated fat are voluntary. Thus, the consumer is deprived of important nutritional information mandated by the NLEA: the amount of healthy *cis*-unsaturated fat and the percentage of this fat as a part of known daily needs or, as with other essential nutrients, a specific declaration that the product is not a significant source of this essential nutrient. *Cis*-polyunsaturated fatty acids (PUFAs) are essential nutrients for all humans. This omission is striking and should be corrected. We suspect that at the time of the initial promulgation of the regulations, a contingent within the nutrition community contended that the healthiest fat consumption was the lowest possible and mistakenly applied this thinking to all fats, including essential fats, possibly based on the generally high fat consumption in the American diet. We now know this to be untrue. First, as recognized by

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[a] *See* Section I for chemical classification and terminology applicable to fats.

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worldwide health authorities and the medical community, healthy fats are an essential and necessary part of the human diet. Maintenance of good health is not possible without the consumption of a diet containing a minimum of the essential fats linoleic acid (LA) and alpha-linolenic acid (ALA). Second, growing evidence also suggests that healthy fat consumption is necessary to reduce obesity or, consequently, that healthy fat consumption may displace unhealthy fat consumption. Recent studies have shown that weight loss diets with substantial amounts of essential *cis*-unsaturated fats and proteins, but reduced levels of carbohydrates, and without imposed caloric restriction, are at least equally effective as intensive caloric restriction in inducing weight loss. These studies suggest that the low fat, high carbohydrate diets implicit in the current nutrition label may not induce satiety without calorie counting and, thus, could contribute to obesity. Third, healthy *cis*-unsaturated fats, whether poly- or monounsaturated, are not associated with risk for heart disease, stroke, cancer, or other medical condition. Indeed, healthy *cis*-unsaturated fats, especially omega-3 fatty acids, may reduce the incidence of acute and chronic heart disease. The declaration and acknowledgement of the necessity of essential fatty acids as a mandatory minimum component in the diet should be a prime consideration in the upcoming revision of federal nutrition guidance and regulations. Fourth, restrictions on the use of health claims for products composed of healthy unsaturated fats, based solely on their unsaturated fatty acid content, should be revised or clarified to reflect the absence of any risk from appropriate necessary amounts of unsaturated fat in the diet.[b] Finally, the absence of recognition of the need for healthy fats in the diet in the Nutrition Facts panel and under other U.S. guidance and regulations should be corrected. The absence of any recommendation about necessary minimum unsaturated fat consumption by FDA stands apart from the recommendations of major international and national public health nutritional guidance, including the National Institutes of Health.

The Nutrition Facts panel is further flawed because the regulations require the manufacturer to misleadingly inform consumers that there is no lower limit of healthy fat content in the diet below which the consumer should not go. In contrast to every other healthy and required nutrient, the consumer is advised that any level of fat consumption below 65 grams in a 2,000-calorie diet is satisfactory. This is simply not true since there is an essential need for certain unsaturated fats in the diet. In contrast, minimum recommendations are set for all other essential nutrients: protein, carbohydrates, dietary fiber, vitamins, and minerals.

The omission of a required declaration for *cis*-unsaturated fats contrasts with other areas of voluntary federal nutrition regulations. For instance, FDA has promulgated a health claim that acknowledges that a diet low in saturated fat and cholesterol may reduce the risk of heart disease. Such a diet, given the essential dietary need for *cis*-unsaturated fats, must of course preferentially include these fats. It must also authorize manufacturers of healthy fats or oils that are sold as meal preparation ingredients to label their product with a statement that when consumed as part of a daily diet, the product may reduce the risk of heart disease and stroke.[c] Nutrition content

[b] *See, e.g.*, 21 C.F.R. §§ 101.73, 101.75 and discussion, *infra*, section V.

[c] The regulation clearly permits a health claim for the reduced risk of heart disease for prepared foods comprised of healthy fats based on the fact that they use an alternative to saturated and *trans* fats. While the regulation is not clear on its face that the same health claim would necessarily apply to the ingredients themselves, for those making their

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claims are permitted that tout the benefits of *cis*-unsaturated fat, an increase in *cis*-unsaturated fat relative to other comparable oils, or the relative absence of saturated fat relative to other oils. The agency has recently promulgated new regulations for *trans*-unsaturated fats that would similarly permit manufacturers of *cis*-unsaturated oils to make comparative nutritional content statements relative to these unhealthy fats. Additionally, as newer research has shown the potential benefits of omega-3 unsaturated fat, the agency has recently permitted statements about this healthy fat. The agency has permitted the touting of potential cardiovascular benefits of consuming oils containing omega-3 fatty acids. Finally, agency action or inaction in response to submitted claims related to structural or functional activities for dietary supplements also permit touting omega-3 fatty acid nutrient content. These permissible claims provide further support for the need to amend mandatory labeling requirements to require disclosure of *cis*-unsaturated fatty acid content in amount per serving and percent Daily Value. In addition, the FDA should clarify the applicability of health claims to healthful fats and oils.

The U.S. Canola Association believes that the time has come for mandatory recognition of the need for healthy fats in the diet and clarification of any voluntary labeling conditions that might restrict consumer information about the healthfulness of dietary unsaturated fatty acids. Canola oil itself serves as a prototype of an ideal healthy oil with its commercial availability, high content of *cis*-PUFAs (ALA and LA), its almost negligible content of saturated fat (7%), especially in contrast to all other commercial oils, and its relatively high content of the omega-3 unsaturated fat ALA (11%). Canola oil is also a good source of vitamins E and K. Among commercially useful oils, canola is nutritionally the best. However, all healthy oils should be recognized by a required disclosure of quality. The declaration of the need for healthy fats on food labels should be mandatory.

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IBWA
International Bottled Water Association

Alexandria, VA
Phone:
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August 26, 2004

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

To the 2005 Food Guide Pyramid Reassessment Team:

The International Bottled Water Association (IBWA) welcomes this opportunity to submit comment to the 2005 Food Guide Pyramid Reassessment Team as it considers viewpoints and other information for the Food Guide Pyramid graphic presentation and consumer education materials. IBWA is a trade association representing the bottled water industry and is the authoritative source of information about all types of bottled waters. Founded in 1958, IBWA's membership includes U.S. and international bottlers, distributors and suppliers. Strengthened by IBWA Model Code, the Association is committed to working with the U.S. Food and Drug Administration (FDA), which regulates bottled water as a packaged food product, and state governments to set stringent standards for safe, high quality bottled water products.

As noted at recent meetings of the 2005 Dietary Guidelines Advisory Committee, The National Academy of Sciences (NAS) Panel on Electrolytes and Water of the Food Nutrition Board/Institute of Medicine (FNB/IOM) on February 11, 2004, issued its report, "*Dietary Reference Intakes (DRI) for Water, Potassium, Sodium, Chloride, and Sulfate*."

While the report did not include recommended intake levels for water, it did state that "women who appear to be adequately hydrated consume an average of approximately 2.7 liters (91 ounces) of total water – from all beverages and foods – each day, and men average approximately 3.7 liters (125 ounces) daily. These values represent adequate intake levels. Those who are very physically active or who live in hot climates may need to consume more water." To read the NAS report, press release and other material online, visit www.nationalacademies.org.

This means that men seeking to stay adequately hydrated would need to drink 100 ounces of water or other beverages and just over 72 ounces for women. These NAS findings exceed the previous general guidance to drink 64 ounces of water as recommended by the 8x8 guidance. Consumers, who wish to follow the NAS observation for adequate water intake for hydration, can indeed choose water– or bottled water – as their beverage of choice.

Since NAS did not provide a specific water consumption recommendation, the Food Guide Pyramid Reassessment Team has a unique opportunity to provide specific guidance for Americans as to levels of water intake that may help to maintain optimal hydration and health. Based on separate informal surveys and dialogue held at recent meetings of both the American Dietetic Association and the American Alliance for Physical Education, Recreation and Dance – whose members represent the nutrition, dietetics, fitness and health fields -- there appears to be confusion among practitioners due to a lack of solid guidance for water intake, which they may offer their patients and clients.

However, respondents agree that Americans are not drinking enough water and either "strongly agree" or "agree," according to IBWA's informal survey, that water intake guidelines should be included in the 2005 Dietary Guideline revision and the Food Guide Pyramid

IBWA stresses the importance of water consumption for proper hydration and refreshment and strongly encourages the inclusion of water consumption **guidelines** in the 2005 Food Guide Pyramid. The "Modified Food Pyramid for 70+ Adults," developed by the USDA Human Nutrition Research Center on Aging at Tufts University, has made a recommendation for eight daily servings of water to form the foundation for the "Modified Food Pyramid for 70+ Adults." By all accounts, recommended water intake is most appropriate for inclusion in the 2005 Dietary Guidelines and resultant general Food Guide Pyramid for all age groups.

The term "guidelines" is highlighted above as there is no "one-size-fits-all" prescription for water intake, much less for other food groups represented on the Food Guide Pyramid.

Water is an excellent choice for hydration and refreshment because it does not contain calories, caffeine, sugar, artificial coloring, alcohol and other ingredients that may contribute to overweight/obesity, hypertension and other maladies and water is an ideal drink of choice for all age groups and levels of activity.

For the active to moderately active person, water provides hydration and refreshment to replace fluids lost during exercise. For sedentary individuals, water hydrates and refreshes without adding calories. For all persons, water and proper hydration aids many other physiological functions including cushioning of the joints, aiding digestion, cognitive function and respiration.

Were there to be no specific water consumption recommendations presented in the Food Guide Pyramid, the Team should carefully consider graphic and/or text advice to drink water on a regular basis to stay hydrated and refreshed and, in the supporting educational materials, which supplement the Food Guide Pyramid graphic, a clear interpretation of the NAS DRI report as stated within these comments should be provided.

News and other organizations wrongly interpreted the NAS report by stating that NAS had rejected the general guidance to drink eight, 8-ounce servings of water (64 ounces) each day (the "8x8" guidance). In fact, NAS specifically did not make any intake recommendations or comment on the 8x8 guidance, at all.

Bottled water, as a package food product regulated by the US Food and Drug Administration (FDA) is a sensible reference point for the Food Guide Pyramid as it is a food product that delivers the above mentioned benefits of water while providing consistent safety, quality, convenience and good taste.

Sincerely,

Stephen R. Kay
Vice President, Communications

SNACK FOOD ASSOCIATION
An International Trade Association

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August 27, 2004

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

Dear Food Guide Pyramid Reassessment Team:

The Snack Food Association (SFA) is an international trade association representing snack food manufacturers and suppliers. SFA membership includes smaller regionally based snack food companies in addition to large national branded snack food manufacturers. SFA members manufacture potato chips, snack bars, tortilla chips, pretzels, cookies, popcorn, crackers, meat snacks, pork rinds, snack nuts, and other snacks. We are pleased to have the opportunity to provide comments on the review of USDA's Food Guidance System – the Food Guide Pyramid – and to work with the USDA to communicate critical fitness and nutrition information to the public.

Advantages and disadvantages of retaining pyramid shape:

The pyramid is one of the most recognized nutrition education tools, in the United States and around the world. We believe that to overhaul the entire pyramid graphic at this point, as some have suggested, would be counterproductive. At the same time, some improvements are needed. Although the pyramid is very recognizable, only a small percentage of the population is following its advice. In one study published in the Journal of the American College of Nutrition, the authors identified significant gaps between the nutrition information contained in the pyramid and consumer eating behaviors. They specifically identified large segments of the adult population from a nationally representative sample that failed to meet USDA dietary recommendations for fruit and dairy consumption (1). In another article in the Journal of the American College of Nutrition, the authors found that less than 10% of older adults met the pyramid's recommendations for dairy and grain servings. USDA can continue to use the existing pyramid shape, but build slightly on its appearance. It may be useful to give the pyramid a three dimensional look.

Phone ◆ Fax: ◆ Alexandria, Virginia ◆ www.sfa.org

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Advantages and disadvantages of relying on core messages while still using the pyramid graphic, as well as, educational and motivational messages and effective tools:

The pyramid cannot convey all nutrition concepts to all audiences, but there are a few key messages within the existing pyramid that would benefit from refinement and focus. As a general approach, it might help consumers if the pyramid itself targeted one, two or three overarching nutrition messages and communicate those to the public, while accompanying educational materials provide additional reinforcement and explanation about its use. For example, we know that variety, proportionality, and moderation are major themes in the current pyramid, but the practical application of these concepts is not always clear to consumers. USDA can build on the existing success of the graphic and use that success to better highlight those messages that are most important to the public.

The supporting materials for the pyramid can also be used to convey more individual and relevant information for consumer's specific lifestyles. One example may be for USDA to develop calorie-specific pyramids. This may help consumers estimate specific calorie needs and know the corresponding amounts of food needed to meet those needs. A pyramid built around caloric intakes such as 1600, 2000, and 2500 can help a growing young adult and an adult female trying to maintain a healthy weight decide the appropriate needs for them. The broad nature of the current recommendations can confuse consumers as to what is needed for their lifestyle.

Another critical concept in need of further refinement and clarification is portion awareness. As the dietary guidelines point out, it is important that consumers understand that calories do count and that portion control is a critical component of calorie control. A serving is the amount recommended in consumer education such as the pyramid, but a serving is not necessarily the amount commonly eaten and it is not thoroughly understood by the consumer. In fact, many consumers overestimate their serving sizes of pasta, rice and meat. Even consumers who try to eat within their calorie needs have trouble with serving sizes.

We are recommending that USDA use this revision to reeducate consumers on serving sizes and portion control through the use of everyday objects. For example a medium baked potato is about the size of a computer mouse, and an appropriate apple or an orange serving is about the size of a baseball or tennis ball. We can encourage consumers to learn proper portions by helping them see what they eat everyday. Hardly any fruits on the market are the size of a tennis ball or baseball, which is the standard reference point used to measure a serving of fruits. If fruits and vegetables were adjusted to accurately reflect the produce in the market, then consumers may understand that the recommendation to eat five servings of fruits and vegetables is not unrealistic.

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To help consumers better understand dietary recommendations, it may be useful to provide more education about the amounts of foods commonly eaten by consumers in one meal and how those portions relate to the number of servings recommended in the pyramid. For instance, peanuts as a snack are usually poured in your hand before consuming; consumers could be advised to, roughly measure how much your hand holds and compare this to the serving size recommended. Another example is for a serving of pasta, which now is half a cup: if the serving were adjusted to reflect what consumers often eat, then the serving size should be more like two cups and the recommended number of servings in the grain group would be four or six. The same principles would apply to the fruit and vegetable group.

The Snack Food Association has always emphasized the need for increased activity among the public and believes that exercise is vital to the health of all Americans. Therefore, energy balance should be considered an integral part of the messages communicated in the pyramid. When consumers are aware of their caloric intake and how exercise fits into the equation, they can monitor their caloric input and output easier. Today, less than one-third of Americans meet the federal recommendations for a minimum of 30 minutes of moderate physical activity at least 5 days a week. Forty percent of adults engage in no exercise activity at all. It is clear that physical activity and exercise need to be made a higher priority in the United States. Leading health experts know that inactivity leads to poor health; as recommended by the dietary guidelines; daily physical activity should be part of everyone's life. The children's food pyramid contains information and visuals targeting exercise and activity, perhaps it is time to move in the same direction with adults.

Channels of delivery for the Food Guidance System:

We support USDA's plans to create individualized advice, and feel that the pyramid and dietary guidelines can benefit the consumer with a focused web site that allows them to tailor the food guidelines to more specifically fit their needs. Since most consumers do not have daily access to a personal health educator or coach, it would be rewarding to have a place to go for answers and guidance on their nutrition and fitness choices. All materials pertaining to the food guidance system should be accessible in one place and USDA should encourage all organizations that want to communicate nutrition guidance to link to this one site or tap into one resource. Again, a one-stop shop is needed.

As it has in the past, the pyramid must be based on the most recent, authoritative scientific information and should be consistent with the Dietary Guidelines for Americans. The revised pyramid should also be clear that the information is intended for healthy people and individuals with medical conditions or diseases should consult a professional who can assist with specific dietary needs.

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Thank you for considering our recommendations for revision of the Food Guide Pyramid.

Sincerely,

James A. McCarthy
President and CEO

1. Cleveland LE, Moshfegh AJ, Albertson AM, Goldman JD. Dietary intake of whole grains. *J AM College of Nutrition*. 2000; 19(3 Suppl): 331S-338S.

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Sun-Maid Growers of California

Kingsburg, CA
Ph: • Fax:

August 27, 2004

Food Guide Pyramid Reassessment Team
United States Department of Agriculture
Center for Nutrition Policy and Promotion
3101 Park Center Drive
Room 1034
Alexandria, VA 22302

Reference: Written comments on the proposed plan for revising the food guide's graphic presentation and consumer education materials.

Dear Sirs:

Sun-Maid Growers of California is the largest processor and marketer of dried fruits in the United States, and has been providing raisins and dried fruits to American consumers for over 90 years.

We will keep our comments succinct:

All health authorities in the world recommend significant consumption of fruits and vegetables. In the United States the American Cancer Society, the National Action Plan to Improve the American Diet, the Produce for Better Health Foundation and others all recommend that consumption of fruits and vegetables will lower cancer risk and promote better health. Fruits and vegetables are high in antioxidants, high in fiber, high in vitamins, and high in nutrients, which all have been proven to improve health, lower cholesterol, prevent cancer, and reduce obesity. Food advice is legendary of children being motivated to eat vegetables because "Mother said so" or because "an apple a day keeps the doctor away."

Vegetables are naturally remarkably low in calories, and fruits, because of their high natural sugar, are high in calories. Yet taken together, a diet high in fruits and vegetables is a diet of moderate calories and high in antioxidants, vitamins, minerals and fiber, all which promote better health.

The weakness of the present food pyramid is that it does not focus on fruits and vegetables as the <u>single most important element of good health.</u>

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As a matter of national policy, consumers should be encouraged to make consumption of fruits and vegetables a first priority before they consume the other food groups. The present food pyramid gives the impression that breads, cereals, rice and pasta are the most important food group to consume for good health and this is plainly not true.

Unless focus is placed on fruits and vegetables as the most important element of good health, an effective change will not be possible and obesity and cancer risk will continue to increase.

Sincerely,

Barry F. Kriebel

Barry F. Kriebel
President

BFK/mas

GROCERY MANUFACTURERS OF AMERICA
MAKERS OF THE WORLD'S FAVORITE BRANDS OF FOOD, BEVERAGES, AND CONSUMER PRODUCTS

WASHINGTON, DC

www.gmabrands.com

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August 27, 2004

Eric J. Hentges, Ph.D.
Executive Director
Center for Nutrition Policy and Promotion
3101 Park Center Drive
Room 1034
Alexandria, VA 22302-1594

Dear Dr. Hentges:

The Grocery Manufacturers of America (GMA) appreciates this opportunity to offer comments on the graphics and educational materials for the Food Guidance System that have been proposed by the Center for Nutrition Policy and Promotion (CNPP) at the U.S. Department of Agriculture.

As work proceeds on the revision to the Food Guidance System, CNPP identified six areas of particular interest to the agency. GMA and its member companies offer the following comments to the six areas identified by the agency.

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.***

GMA recommends CNPP keep the shape of the Pyramid. The Pyramid is widely recognized and the Department should capitalize on the brand equity it has built since 1992. It's not the shape that has hampered Americans from following the current Pyramid's dietary advice but the lack of understanding on how to make the underlying nutrition recommendations a reality. We fully agree that the dietary recommendations that form the basis for the Pyramid should be revised and updated based on the most recent nutrition and health science. Resources should also be devoted to building stronger educational tools that help bridge the gap between consumer awareness and behavioral change.

The agency has proposed to simplify the graphic and use it as a symbol to identify food guidance messages and materials, and to remind consumers to make healthful food choices. GMA recommends that the symbol be placed next to dietary messages placed on food packages. The symbol would alert consumers that a nutrition tip is present. Ultimately, we hope that consumers would look for the next "catchy" core message on food packages and use it as a tool to improve their total diet.

The agency indicated they did not want to list serving sizes on the new graphic based on consumer research conducted by CNPP that showed detailed messages about the food groups—placement, amounts to eat—were not well understood by consumers when viewing

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the graphic without supplemental materials. GMA believes the new Food Guide Pyramid graphic should provide an infrastructure upon which to systematically base food choices and so we offer another idea. Why not provide the number of servings for the different food groups based on a 2,000 calorie diet? By doing so the agency would synchronize the Food Guide Pyramid with the food label, including the Nutrtion Facts box, which is based on a 2,000 calorie diet. Consumers would then have consistent dietary information across all consumer touch points. If adopted, the number of servings of whole and enriched grains, dairy foods, fruits and vegetables and meats shown in the revised, standardized Pyramid for the System would reflect a 2,000 calorie diet. The new Food Guide Pyramid graphic would not provide a range of servings shown for each food group given that consumers misunderstood the range of servings to mean that an individual consumer could select any number of servings within the overall range. As with the Nutrition Facts panel, a standardized Pyramid on food packages and labeling would not only serve as a reference point and baseline for what constitutes a healthy diet, but would also reinforce the Food Guide Pyramid's basic nutrition messages. Consumers would learn that a Pyramid specific to their own age, gender and physical activity level is available at an interactive web site that would provide serving sizes based on their individual caloric requirements.

GMA supports the inclusion of water and exercise to the graphic. The amount of food one eats and the amount of physical activity one engages in is a dynamic relationship that should be illustrated on the new Food Guidance Pyramid graphic. Eating has to work together with physical activity, whether exercise, play or work..

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

We applaud the agency for seeking ways to connect with consumers and motivate them to eat more healthily. It is important that the Food Guide Pyramid be used as a component of creative interventions designed to help consumers achieve desired health behaviors.

A. *Motivational/Awareness Components*
   1) *Graphic:* GMA's comments on the graphic are found above in Section A.
   2) *Slogan:* GMA supports the development of a slogan(s) to encourage consumers to make healthy food choices.

B. *Educational Components*
   1) *Daily Food Intake Patterns*
      GMA supports the concept of sub-groups within the vegetable and grains groups. GMA agrees with three servings of whole grains per day. Equally important to communicate to consumers is the role that enriched grains play in the total diet, especially as they provide a valuable micronutrient contribution to the diets of Americans, and would make up the remaining servings of grains. GMA suggests that the CNPP include processed foods in examples of recommended food choices.

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2) *Core Messages and Framework*

The anticipated revision of the Food Guide Pyramid is an unprecedented opportunity to explain how Americans can take simple but effective steps to improve their diets and health. GMA believes we need to apply a marketing approach to promote healthier eating, that is, describe the features of the guidelines (e.g., serving size, number of servings, food groups) and emphasize the benefits (e.g., better health, weight management). And the core messages must recognize and build on the factors consumers apply in choosing foods and a diet – taste, convenience, cost, relevance, and cultural characteristics – in order for the guidance to be actionable.

GMA suggests the CNPP make it easier for consumers to follow the revised nutrition guidelines by prioritizing the changes consumers could make to their diets for maximum health gains. In addition, set achievable dietary goals for healthy Americans that take into account the diversity of American socio-economic and cultural circumstances. It is important that an individual has the opportunity to experience the reward of success relatively early on in the process and build from there with additional changes in dietary behaviors. .

The CNPP has indicated the core messages are intended to result in behavioral changes that will focus on three areas: energy balance, improving food selections that are nutrient dense and lowering chronic disease risk by reducing the consumption of saturated fats, trans fat, cholesterol and sodium. GMA believes core messages need to clearly communicate what individuals and families can do to create healthy diets and lifestyles. The CNPP should seek a tone that encourages behavioral change.

- Energy Balance – "Calories Count" could be a core message. Consumers respond better to a "Calories Count" message than "Count Calories." The former is a subtle but very effective message that encourages and promotes behavior change. The latter puts individuals into a more defensive mode and thus is less likely to be acted on. GMA strongly believes the Food Guide Pyramid needs to take a comprehensive approach to energy intake and energy expenditure, and that it is vital to educate Americans on how to take active roles in moderating their food intake to match their level of physical activity to achieve energy balance. GMA believes it is not enough to simply include guidance on physical activity in the Pyramid. It is necessary to integrate recommendations about energy intake with energy expenditure.

- Nutrient Dense Foods – The proposed Food Guide Pyramid appears to recommend ideal diets for Americans. This will likely be a significant challenge for most consumers, and therefore a challenge to the success of the Food Guide Pyramid. For the Pyramid to be a useful tool for most Americans, it is imperative that the CNPP lay out a roadmap. Consumers want foods that easily fit into their lives, as opposed to having to change their lives to suit an entirely new way of eating. This brings us to the second core message,

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improving food selections that are nutrient dense. Many Americans have made changes in the type of milk they consume. However, consumers did not jump from whole milk to skim milk overnight. As the CNPP strives to encourage Americans to make better selections within food groups, individuals should be encouraged to make small improvements in eating that, over time, add up and move them closer to meeting the recommendations of the new Food Guide Pyramid. Incremental but cumulative changes should be encouraged and applauded.

Another example would be increasing the number of servings of whole grains Americans consume per day. The food industry is committed to providing a supportive environment to help American reach this dietary goal. Whole grain descriptors would be of enormous value for consumers. New product development of foods that are a good source of whole grains (1/2 serving) could serve as an intermediary step to consumption of foods that are an excellent source of whole grains (1 serving). An individual could choose to select six servings of foods that are a good source of whole grains and still meet the dietary goal of three whole grain servings per day. Acceptance of foods that are a good source of whole grains is also likely to be higher as consumers adjust to the potential difference in taste on a more gradual basis than switching directly from enriched grain products to whole grain products. The likelihood for success improves dramatically.

- Chronic Disease Prevention – GMA encourages the CNPP to provide positive messages about choosing foods that combat chronic disease instead of focusing on avoiding certain food groups. For example, foods rich in potassium, calcium, and magnesium are important in reducing blood pressure. The key message for consumers is that foods like fruits and vegetables and low-fat dairy help to reduce blood pressure. Consumers will respond better to positive messages about steps they can take to improve their health, whereas more messages about foods they should avoid are discouraging and less likely to be adopted.

3) *Interactive personalized guidance tools*

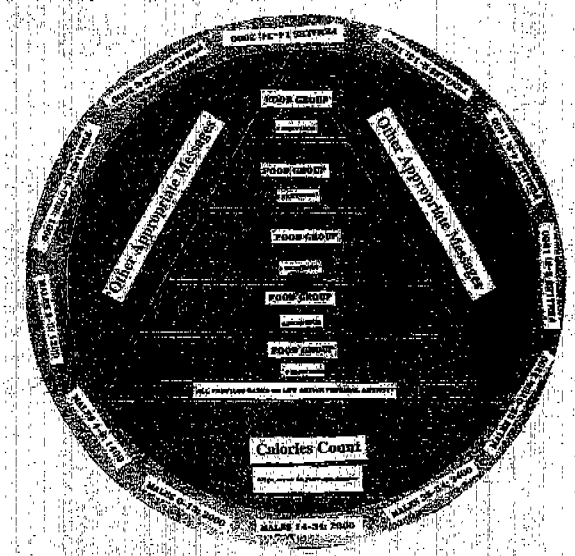
GMA recommends that individualized daily food intake recommendations not only be based on age, sex, height, weight, and physical activity level but also on ethnicity. This would enable culturally-relevant food choices to appear on the screen first, making the Food Guide Pyramid more actionable for the individual.

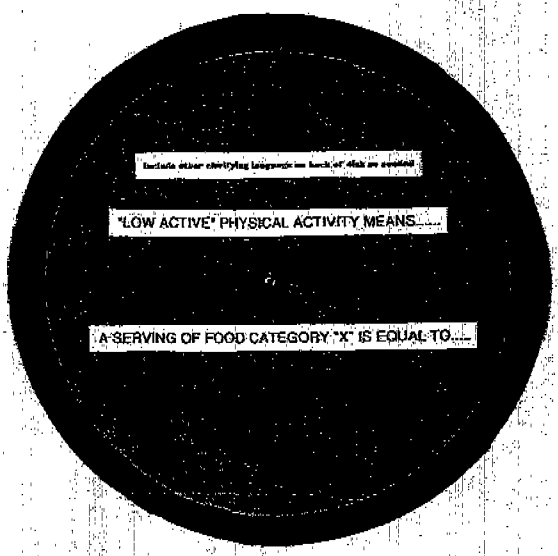
The CNPP indicates that the new interactive tools are not envisioned to replace but rather to work in concert with CNPP's existing Interactive Healthy Eating Index (IHEI) and Interactive Physical Activity Tool (IPAT). GMA has had the opportunity to explore and use the IHEI and the IPAT. Our comments are included under Section E.

4) *Print materials and tools*

While the USDA is looking to create a Web site where a user can enter their own information, GMA feels that it is equally important that the Food Guide Pyramid be communicated to the entire population. This would include individuals that may not have easy access to a computer or other electronic devices. One of our member companies developed a prototype "Pyramid Wheel" that would be easy for USDA to implement as a way to communicate information on the types and amounts of foods to consume. Because the objective is to have the Food Guide Pyramid distributed as widely as possible, a device like this must be easy to use and low cost to produce.

Last year, USDA suggested 16 nutritional profiles (energy requirements in calories) based on age, gender, and level of physical activity. [Table 2 "Energy Levels for Proposed Food Intake Patterns", USDA Technical Report of the Food Guide Pyramid.] We consolidated a few groups where the energy requirements were similar, resulting in 12 profiles that we added to the prototype "Pyramid Wheel". A mock-up of this concept has been included in our submission, and a graphic is included here.





As the graphic is meant to show, the Food Guide Pyramid is superimposed over a round disk. The disk would contain all of the relevant serving information for each of the 12 energy level profiles based on age and gender. The food groups and the number of servings would be visible through windows for the five generic food groups as the Pyramid is rotated to one of the age/gender/energy intake profiles. We chose to keep the information very general at this point until more details on the number and placement of food groups as well as number of servings are known. The prototype submitted covers the low active profile, and separate Pyramid Wheels would need to be developed for sedentary and active physical activity levels.

Other appropriate healthy lifestyle messages could be placed on the wheel outside the actual Pyramid. This might include the new Food Guide Pyramid slogan or one of the core messages (e.g. "Calories Count"). The back of the disk could be used for definitions or to clarify servings and food group information. GMA agrees that using standard household measures is an appropriate approach that would help to make the Food Guidance Pyramid more relevant and potentially improve implementation of food guidance.

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

GMA encourages CNPP to extensively test revisions to the Food Guide Pyramid with consumers. Do consumers understand and like the new approach and are they motivated by either the generalized or individualized messages? Are they likely to act on the guidance? Can they use the guidance to plan a set of meals for a day, a week? Does it seem achievable?

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

GMA supports the approach of simplifying the graphic but does not support the graphic simply becoming a symbol for the System. GMA urges the CNPP to harmonize educational information across all consumer touch points. GMA suggests the graphic provide the number of servings for the different food groups based on a 2,000 calorie diet. By doing so the agency would synchronize the Food Guide Pyramid with the Nutrition Facts Panel which is based on 2,000 calorie diet. GMA urges the CNPP to also synchronize serving sizes found on the Food Guide Pyramid and the Nutrition Facts Panel. GMA urges the Department not to conflict with the NLEA regulations that comply with a statute of law on what constitutes a serving size. Additional suggestions for the new Food Guide Pyramid graphic are discussed in Section A.

GMA supports a focus on core messages that have been thoroughly consumer tested. GMA recommends that the CNPP prioritize the changes it would like to see in the food supply as well as prioritizing changes in dietary habits since neither the food and beverage industry nor consumers can make all of the recommended changes overnight.

Additionally, it will be important for USDA to foster public/private partnerships that will help expand the reach of the Food Guide Pyramid and its accompanying nutrition messages. As the makers of the foods and beverages that consumers buy and use every day, we believe GMA member company products and services can be critical tools that the USDA can use to improve consumer understanding. Below are examples of public/private partnerships that have successfully served as direct conduits to the consumer, informing them about nutrition, physical activity and the need to establish a healthy lifestyle. This is not an exhaustive list of company efforts, the inclusion of the examples is in no way an endorsement of a particular program, company or its products; rather, these are examples offered to assist USDA.

The National Cancer Institute All-Bran campaign launched in 1984 in which a major cereal manufacturer promoted the NCI dietary fiber guidelines was one of the first nutrition PR campaigns involving a non-profit and a for profit company. It included advertisements (TV, newspaper and magazines) and a PR campaign with health professionals. It was highly effective in raising awareness of fiber and resulting in real behavioral change (increased fiber consumption) for many Americans, including families of low socioeconomic level. This is an example of applying marketing approaches to achieve incremental but cumulative changes that have the potential for significant effects on the total population.

GMA recommends the CNPP meet with the 5-A-Day campaign to learn from this effort to increase fruit and vegetable consumption in Americans. The food industry has introduced a multitude of new products including vegetables with different sauces, fruits packed in juices, pull top cups of fruit, and fruit bowls. Creative packaging can make food fun and encourage consumption of fruits and vegetables. Baby carrots are a prime example. They are cut to a two-inch size, making them a very convenient food to nibble on. They also come in single-serving packs with ranch dressing for dipping on the side. Today, Americans are eating a lot more carrots each year than their parents did.

A major baby food manufacturer took the 5-A-Day health recommendation and developed an actionable and meaningful message for parents. The campaign "Five servings equals two and a half jars of fruits and/or vegetables" was targeted for toddlers 12-24 months of age. The message was simple and educated parents how to start a healthy habit early in a young child's life.

A GMA member company places on its 64 ounce cartons of orange juice Mayo Clinic Healthy Living Tips. Mayo's research indicates that consumers welcome having nutrition information on a product package, if it comes from a trusted, recognized source. The side panel of the 64-fluid ounce cartons of orange juice includes information on a range of topics such as heart health, digestion, immunity, stress management and bone health.

America on the Move not only promotes exercise but incremental reduction in caloric intake (100 calories less) as part of their program. GMA encourages CNPP to learn from this program and identify the key motivating factors in bringing about change in both physical activity behavior and dietary intake behavior.

America on the Move and a GMA member company are launching *Balance First* an educational program that teaches children how to balance calories consumed with calories used. The program will be distributed to 2.5 million school children this fall. *America on the Move* developed the content and the company provided the creative for the materials and the program. It is just one example of a public/private partnership that will help advance public health.

A GMA member company and the National Association for Sport and Physical Education developed the Step With It! program. The program was launched in 2001 and will expand to 1000 middle schools with one million students participating in 2004. The program provides participants with a "Stepometer," a small pedometer, to track the number of steps taken in a

typical day. The "Step With It!" program encourages participants to take a minimum of 10,000 steps a day to maintain good health through a more active lifestyle. The idea is to make physical activity fun even for those who aren't involved in athletics.

GMA and its member companies stand willing to be an effective partner with the Department by amplifying core messages developed by the CNPP and motivating consumers to make healthy food choices.

E. ***Key components for effective interactive educational tools.***

USDA: Interactive Healthy Eating Index

GMA has had the opportunity to explore and use the IHEI and the IPAT.

- The site provides an extensive searchable food index.
- There is a wide selection of serving sizes for selected food items.
- A side-by-side comparison of suggested nutritional intake and the individual's intake is provided, enabling the user to see what areas of his/her diet can be improved.

- The tool does not provide nutritional information on individual foods items consumed. Therefore, when analyzing the diet the individual cannot determine the level of fat, sodium, calories, etc. in the food. It would be beneficial to be able to view the nutritional composition of individual food items.
- It would also be helpful for food selections to be broken down by meal in order to determine the amount of calories consumed at each meal throughout the day.
- A calendar format would allow one to easily compare his/her intake over time.
- There is no link to the amount of food eaten and the relationship to a serving size on the Food Guide Pyramid. An individual chooses an item such as a banana and then the individual is given options for serving size such as the size of the banana, if the banana is chopped or mashed, etc. However, the tool does not provide information on how many servings of fruit have been consumed by eating the banana.
- An interactive tool or a chart that references commonly consumed items from each of the food groups and provides their serving size information would be beneficial because many consumers are unclear as to what a serving is.
- Integrating the physical activity tool and the nutrition tool would enable the individual to determine his/her energy balance and is a critical step in consumer understanding of energy balance. If used in conjunction with a calendar, the individual could quickly compare his/her energy balance and track improvements.

USDA: Physical Activity

- Physical activity must include all activities performed in the last 24 hours. In theory, one is able to record their activity for every minute of the day, including time using the bathroom, brushing teeth, walking to and from the car, walking around the office, etc.
- Once one stores the frequently performed activities the tool is easier to use. However, it is almost impossible to account for every minute of the day.

- It is a very lengthy process to complete. It took a staff member approximately 45 minutes to enter all her activities performed during the day, and she was still unable to accurately account for all the minutes in the day.
- It would be more beneficial for the individual to be able to determine how many calories are burned during a specific exercise than for him/her to have to determine the exact number of calories burned throughout the day.
- Also, instead of having to record every minute of the day, the tool could prompt the individual to determine their lifestyle (i.e., sedentary, low active, or active). Based on this information, determine the amount of calories the individual would normally burn.
- It would also be helpful if each day the site had suggested activities and stated the amount of calories burned while performing the activities.

In conjunction with the American School Food Service Association, a GMA member company has developed *Habitracker*, a web-based interactive dietary intake and physical activity program for school foodservice directors. This program illustrates, we believe, how CNPP could strengthen their existing interactive tools. Features of the different components of the *Habitracker* program are listed below, and a food log entry is provided in Appendix A. *Habitracker* can be viewed at www.asfsa.org.

Habitracker – Food and Exercise Logging System

Food tool:

- Can search specific restaurant menus as well as brand names so an individual can obtain an accurate calorie count.
- Provides breakout of nutritional content for individual food items.
- Allows an individual to categorize food by meal: Breakfast, lunch, dinner or snack. Provides a caloric subtotal for each meal.
- Generates a side-by-side comparison of your caloric intake and the recommended caloric intake.
- Enables an individual to compare current caloric intake with past caloric intakes.
- Quick and provides an array of information.

- Does not use food guide pyramid.
- Does not provide a breakdown of servings consumed from the different food groups.
- Not as many options on serving size as USDA Web site.
- Does not have as many overall food selections as USDA Web site such as ethnic foods.

Exercise tool:

- Exercises are broken down into aerobic, strength and workout regimens.
- States calories burned for individual activities as well as total calories for all exercise done in a single day.
- Individual does not have to account for every minute of the day. After selecting a lifestyle and entering exercise information for the day, the tool calculates an individual's energy balance for the day.
- Site can keep track of weight if used daily.
- Easy to navigate and is not time consuming.

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Virtual Trainer:

- Breaks down muscle groups and suggests specific exercises to strengthen them.
- Visual aide demonstrating suggested exercise.

Wellness Assessment:

- An individual answers a series of questions about his/her health status, family health history and personal health habits. The individual receives an assessment on living habits and personal wellness.
- Provides the individual with a wellness score, analysis on current priorities to improve overall wellness and a breakdown of risk factors that increase the chances for developing chronic diseases.
- The Virtual Health Coach tool provides an individual with support and information on actions you can take to improve your overall wellness.
- Entire assessment takes about 15 minutes to complete.
- Easy to use and helpful.

GMA member companies support the International Food Information Council (IFIC) Foundation's Web site www.kidnetic.com, an interactive Web site that teaches kids and their families how to live healthier lives through proper diet and regular physical activity. GMA encourages the CNPP to meet with the IFIC Foundation to hear what they have learned along the way in developing a very successful Web site for "tweens" and their families as well as a resource for health professionals and teachers.

A GMA member company launched a very successful interactive Web site that allowed an individual to enter what they ate for breakfast and build a Breakfast Pyramid. Feedback from consumers was positive in assisting them to improve food choices.

Many of the GMA member companies have Web sites that provide excellent nutrition information. A GMA member company recently launched a Web site that provides 100 healthy living tips, 100 ways to burn 100 calories, and a personal journal to track eating, snacking and exercise patterns. Healthy living tips are also found on the *100 Calorie Packs*, a new line of snack products individually wrapped to provide 100 calories.

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

The Internet is a key channel for delivering Food Guide Pyramid elements. For those consumers who do not have access to a computer GMA has outlined in Section E an alternative means for reaching them.

Once a Web site has been established for the new Food Guide Pyramid, Americans need to be made aware of the Web site through advertising and/or public relations. The Web site needs to be fun, updated on a regular basis (at least monthly), give individuals a reason to come back to the Web site and be relevant to their personal needs, especially as there are so many Web sites and distractions on the Internet.

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Health professionals are a key vehicle for reaching consumers with nutrition messages since they tend to be well-informed on health topics and can reach consumers at critical health trigger moments. To assist health professionals in educating consumers, a GMA member company has a frequently updated health professional website with a variety of free resources (www.bellinstitute.com). Many of the topics, such as heart health, weight management, and whole grains, include key messages from the current Food Guide Pyramid. Health professionals consistently rate the materials as very helpful and often highlight the success of the materials with diverse population groups.

A GMA member company has a Web site (www.campbellwellness.com) devoted to helping consumers translate guidelines into solutions (e.g. dietary plans, menus and wellness-lifestyle techniques). In addition, a Web site (www.labelsforeducation.com) is available for nutrition and wellness resources.

A GMA member company has a Nutrition Camp Web site (www.kelloggs.com/nutrition/nutritioncamp/) that has been successful for over six years. The Nutrition Camp Web site provides a basic nutrition lesson that is entertaining. Teachers speak highly of the Web site and Tuft's Nutrition Navigator links to it.

A GMA's member company has a Web site (www.specialk.com/brand/sk_kay/overview.shtml) that has a chat room and encourages consumers to talk to one another about their experience. This company also promotes the Web site and provides nutrition tips on its product packaging. This online chat format may be something the new Food Guide Pyramid could add as a feature to its Web site. Consumers will certainly need help and encouragement not only from the government, but also from others who are trying to adopt a plan of small changes shown to be effective in achieving sustainable behavioral change. Through an online chat room, families and individuals could share with others their personal experiences and tips in how they adopted the new dietary patterns.

In conclusion, GMA believes that healthy dietary patterns must be presented in a way that individuals can easily and effectively make the right choices, for themselves or as family gatekeepers. If not, even the best guidance, even in the prettiest presentation, will be quickly forgotten.

Sincerely,

Alison Kretser

Alison Kretser, MS, RD
Director, Scientific & Nutrition Policy
Grocery Manufacturers of America

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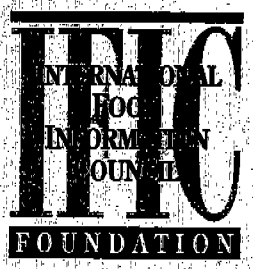

August 27, 2004

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 Volume 69, Number 133 Notice of Proposal for Food Guide Graphic Presentation and Consumer Education Materials

Dear Food Guide Pyramid Reassessment Team:

The International Food Information Council (IFIC) Foundation applauds the open process taken in this revision of the food guidance system and is pleased to have the opportunity to comment. IFIC Foundation's mission is to effectively communicate science-based information on health, nutrition and food safety for the public good. IFIC Foundation is supported primarily by the broad-based food, beverage and agricultural industries. We conduct an extensive amount of consumer research to better understand the public's knowledge and attitudes on nutrition and food safety so that our communications meet the needs of our target audiences. It is through this wealth of research that we are able to provide the following consumer insights.

Both quantitative research conducted by the American Dietetic Association and qualitative research conducted by IFIC Foundation consistently show that consumers are barraged by what they perceive as confusing, conflicting, and changing nutrition advice. Subsequently, consumers feel frustrated making them more likely to disregard the information they receive. The mixed messages come from a variety of sources, but certainly escalating media coverage in the area of nutrition has significantly increased consumer exposure to nutrition information. Consumers do not feel comfortable, nor do they possess the tools to determine with certainty the credibility of the source or choose between contradictory nutrition messages.

Revising the current food guidance system to reflect today's environment provides an important opportunity to reach the consumer with unified and consistent messages that they can act upon in their everyday lives to improve their health and well-being. However, we cannot presume that nutrition messages translated into lay language will be useful to the consumer. It is of the utmost importance that any food guidance system and campaign be thoroughly tested with the target consumer audience(s) to ensure that it meets their needs and motivates behavior change.

Washington, DC | Tel: | Fax: | Email: | http://ific.org

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We at IFIC Foundation believe that the 6 areas of interest being explored by USDA will be effective in soliciting the expertise necessary to effectively communicate the most updated nutrition science to consumers.

1. **Configuration of the new graphic**—Consumer data from an IPSOS Public Affairs survey shows that the Food Guide Pyramid has approximately 88% recognition among American consumers (1) and, in general, consumers understand the overarching messages it is trying to convey, such as variety and balance. To further demonstrate its widespread recognition, the Food Guide Pyramid is mentioned and discussed, without probing, by subjects in virtually every nutrition focus group that IFIC Foundation conducts, regardless of the topic. It has also been widely covered in the media, a message delivery vehicle by which consumers say that they get a great proportion of their diet and nutrition information. Much of the media coverage on the current Food Guide Pyramid has been negative, representing criticism for its failure to curb the obesity epidemic and often promotes "alternative" pyramids created by entities who feel that the Pyramid is inadequate to promote healthy eating to the nation. However, the point should be made that while the vast majority of the population recognizes the Pyramid, most Americans are not currently following its advice properly. In fact, less than 1 percent of the US population actually follows the Pyramid (2). It is our feeling that the high recognition of the Pyramid is an enormous accomplishment and an excellent framework to build upon as we modernize and extend our nutrition guidance. The next imperative step is enhanced communication of its messages in specific and individualized ways in order to illustrate to consumers *how* to apply Pyramid concepts to their lifestyle and eating patterns, rather just recognize it.

2. **Strategies to improve awareness and motivation for using the information**—Consumer research is essential to improving awareness and motivation for using dietary guidance information in that it allows us to communicate in more targeted, specific, and meaningful ways to ensure that messages hit, rather than miss, the consumer mark. We know from research that consumers already feel deluged by the amount of information they receive in regard to nutrition. We also know that when asked, consumers respond that they know all they need to know about health and nutrition. In other words, the issue is not a lack of knowledge per se, but rather a gap between perceived knowledge and behavior. One reason for this is that, although consumers perceive that they have the information, what they claim to know is not always accurate. Therefore, it is important to use consumer research to determine the best messages to present, in a positive and productive way to motivate behavior change, rather than merely providing the consumer with more information. Previous consumer research has already given us some guidelines that consumers consider "mandates" for creating messages and tips that resonate with them. These are: be positive, make them short and simple, provide the payoff, be individualized, make them specific and manageable, and make them fun.

3. **Methods to assist consumers in personalizing the system**—Personalizing the food guidance system for the consumer is key. We know that each individual has unique food preferences and needs. Consumer research has told us that we need to respect these preferences when it comes to recommending food intake. Therefore, it is necessary to provide them with highly personalized nutrition information that fits into their lives. Additional consumer research, conducted in collaboration with USDA and the Food Marketing Institute, to develop a Food Guide Pyramid brochure indicated that Pyramid messages are more useful when they are tailored to meet consumers' specific needs. That is, rather than bring consumers to the Pyramid, it is important to bring the Pyramid to them and demonstrate how it can fit into their existing lifestyle. The result? Study participants found it more understandable when Pyramid servings for the various food groups were illustrated in the "real life" context of foods they eat, such as, "*A deli bagel is equivalent to about 4+ servings from the Bread, Cereal, Rice, & Pasta Group.*" (3) Consumers also responded positively to messages that they can accommodate within their lifestyle. For example, if an individual is fond of full-fat milk, but is willing to make other trade-offs, statements like, "*Love the taste of whole milk? Balance it out with lower-fat foods such as reduced-fat cheese, low-fat sour cream, or fat-free dressing*" are received well (4).

   It will be important to reach the consumers on a variety of levels to ensure proper access to the information and an understanding of how their own individual needs can be met by the food guidance system. Partnerships can be instrumental in both program development and dissemination. In addition, due to its dynamic nature, the Internet may be used to personalize the food guidance system to meet each consumer's individual needs. It bears repeating, however, that any method(s) to personalize the food guidance system should be consumer tested.

4. **Strategies to improve educational messages**—In general, appropriate and effective educational messages should follow the consumer "mandates" listed previously and consumer-testing messages can increase success. Message content must be carefully considered. For instance, in the environment of obesity, it is tempting to focus consumer messages on weight control, calorie control, portion size, energy balance, etc. While health professionals think about and understand these concepts, it is difficult for consumers to understand and embrace them. IFIC Foundation consumer research indicates that while consumers are thinking more about portion size and calories, they are not necessarily changing behavior. Further, calorie information can easily be misunderstood, as it is difficult for the average consumer to determine how many calories they *should* have and how many calories are in the foods they eat. Consumers can feel that calorie information does not apply to them if they are not concerned about weight loss or feel that weight loss is not currently feasible within their lifestyle.

   Additional consumer research needs to be conducted to determine the best way to communicate and deliver messages on weight control, calorie control, portion size, and energy balance. Initiatives to conduct such research are already

underway. For example, later this year the Dietary Guidelines Alliance, a longstanding public/private partnership whose mission is to provide positive, simple, and consistent messages to help consumers achieve healthy, active lifestyles consistent with the Dietary Guidelines for Americans, will be conducting research on communicating energy balance to the consumer.

It is important that messages developed be simple, captivating, and comprehensive enough to drive the consumer to personalize the advice to their lives. A project of the Dietary Guidelines Alliance called *It's All About You* can be used as a case study. *It's All About You* is a campaign that has been extremely successful in disseminating five core messages on healthy eating and active lifestyles, as well as supporting "how-tos" that resonate with consumers. These messages are:

- Be Realistic: Make small changes over time in what you eat and the level of activity you do. After all, small steps work better than giant leaps.
- Be Adventurous: Expand your tastes to enjoy a variety of foods.
- Be Flexible: Go ahead and balance what you eat and the physical activity you do over several days. No need to worry about just one meal or one day.
- Be Sensible: Enjoy all foods, just don't overdo it.
- Be Active: Walk the dog, don't just watch the dog walk.

Why have these messages stood the test of time? The *It's All About You* campaign was developed through extensive consumer and health professional research and boasts significant grassroots utilization by health professionals of its messages and materials. Consumers like the messages because they are encouraging and attainable. They feel empowered by the notion of "small steps" as a measure of success and need to feel that it is ok for food and physical activity to be fun. These messages also put the consumer in charge and counteract the guilt that they tend to feel regarding eating by introducing the concept of balance over time and stressing the importance of moderation. Another key to the success of *It's All About You* is its plethora of supporting tips with which consumers can choose specific, individualized ways to eat healthier and be more physically active within their lifestyle.

5. **Interactive tools to demonstrate the messages**— Consumers obtain nutrition information from a variety of sources. Quantitative data from the American Dietetic Association shows that consumers get the majority of their diet and health information from television, magazines, and newspapers. Other sources of information cited by consumers are the Internet, word of mouth, government, and the food industry. Consumers say, however, that they value the information they receive from health professionals the most. Yet, as discussed above, consumers feel that they receive too much information on diet and nutrition and do not know who to believe. The public would certainly benefit from clear, specific, and practical tips on *how* to eat more healthfully and be more physically active. To that end, it is essential to form partnerships among those entities which provide

nutrition information to consumers to increase the amount of consistent, relevant, and actionable messages that are conveyed and internalized by the consumer. Interactive tools to demonstrate the messages should be developed with consumer input and tested with consumer research to assure effectiveness.

6. **Communications delivery channels for the messages**—Maximizing public adoption of new food guidance may appear daunting. Therefore, we advise using partnerships to reach the widest possible audience with the clearest possible messages. This can be done by forming partnerships with groups such as health professional organizations, food industry, academia, and even the media. Given the success of the Food Guide Pyramid brochure mentioned above and consumer research expertise, IFIC Foundation hopes to continue partnership opportunities with USDA. In addition, the Dietary Guidelines Alliance, with its existing and effective program based on communicating the Dietary Guidelines for Americans, would be an excellent partner. Because this food guidance system revision process is open to public comment, it is hoped that long-term, effective partnerships can be formed and that an increased sense of ownership can be felt by an increased number of stakeholders having input into the revision.

To conclude, IFIC sees the following as vital considerations in revising the food guidance system.

- It is important that the food guidance revision be guided *by* consumers rather than merely developed *for* consumers. Consumer research on potential graphics, personalizing the food guidance system, improving educational messages, interactive tools, and message communication is vital and should be considered an integral step in developing and disseminating the new food guidance system.
- Personalizing dietary advice is very important in motivation and utilization. Consumers are more likely to adopt messages that they can identify with, thus increasing public health and wellness.
- Partnerships can maximize dissemination opportunities and increase the clarity and consistency of messages that consumers receive. They can be instrumental in increasing consumer awareness and motivation to use the food guidance system in their lives.

IFIC Foundation staff is available and may be contacted for additional information regarding consumer perception of messages and/or communications issues associated with developing and disseminating the new food guidance system. We are also pleased to explore new partnership opportunities to communicate food guidance messages that consumers will recognize, understand, and use.

Thank you for your time.

Best regards,

Bond 6 of 7

Susan Borra, RD
Executive Vice President

Shelley Goldberg, MPH, RD
Associate Director

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REFERENCES

1. IPSOS Public Affairs, March 2004. (Interviews with 1,000 adults, margin of error +/- 3.1).
2. Pyramid Servings Data, Results from USDA's 1995 and 1996 Continuing Survey of Food Intakes by Individuals, Table Set 7, Food Surveys Research Group, Beltsville Human Nutrition Research Center, Agricultural Research Service, U.S. Department of Agriculture, http://www.barc.usda.gov/bhnrc/foodssurvey/home.htm, February 1999
3. International Food Information Council Foundation. The Food Guide Pyramid: It's All About You. Consumer Perceptions of an Educational Brochure: Phase II. Tuttle Communications. August 28, 2002.
4. International Food Information Council Foundation. Developing Actionable Dietary Guidance Messages: Dietary Fats as a Case Study. *JADA*. 101: 678-684. 2001.

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from Dietary Guidelines Alliance

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August 27, 2004

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

FR Doc. 04-15710
Notice of Proposal for Food Guide Graphic Presentation and Consumer Education Materials; Opportunity for Public Comment.

Dear Food Guide Pyramid Reassessment Team:

The Dietary Guidelines Alliance (the Alliance) commends the U.S. Department of Agriculture's (USDA) efforts to evaluate and update the Food Guidance System and appreciates this opportunity to provide comments on the Food Guide Graphic Presentation and Consumer Education Materials.

We encourage USDA to strengthen its existing partnership with the Dietary Guidelines Alliance – a long-standing, successful partnership between health organizations, the food industry, the Department of Health and Human Services and USDA. Strategic public-private partnerships are vital in extending the reach and impact of dietary guidance and providing clear messages to a broader audience.

COMMUNICATING TO THE PUBLIC WITH CONSUMER-TESTED, POSITIVE MESSAGES

The Alliance is dedicated to providing consumers with concrete, practical advice on how to apply the *Dietary Guidelines for Americans* to their lives. As part of our efforts to do this, in 1996, we launched the *It's All About You* campaign, a nutrition message platform that consumers could understand and use to positively affect their health. While constructing this educational program, we conducted extensive qualitative research with consumers to uncover what they believe about food, nutrition and physical activity; what they value in life; what motivates them to change; and what they perceive as barriers to change. We found that:

- Consumers are tired of negative nutrition messages; they want to hear what to do, rather than what *not* to do.
- Many believe they must give up the tasty foods they enjoy to follow a healthful diet. Therefore, they're less willing to change their eating patterns.
- When eating certain foods, they understand and practice food "trade-offs" and moderation, but feel guilty because they're not sure they're doing it right.
- Consumers say they're confused about conflicting nutrition headlines and reports, and say that this causes them to question its credibility.
- Good health means eating well and getting enough exercise.
- Consumers believe good health is important because it makes them more confident, energetic and productive, which leads to happiness and satisfaction with their lives.

- People don't understand that there are no "good" and "bad" foods, but "good" and "bad" diets.
- Major obstacles to eating better and being more active include lack of time, energy, and "will power;" force of habit; indifference; and perceptions that practicing these healthier habits is difficult and expensive.

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

According to a 2004 survey, 88 percent of consumers have heard of the Food Guide Pyramid, yet only 17 percent *try* to adhere to the recommendations (1) and less than one percent has intake patterns that actually reflect pyramid recommendations (2, 3). The CNPP should build upon the equity and consumer awareness the pyramid has developed over the past 12 years by **keeping the Food Guidance icon in the shape of a pyramid, but updating the corresponding advice to reflect the most recent nutrition science and consumer research.** Resources should be devoted to building stronger corresponding educational tools that can help bridge the gap between consumer awareness and behavioral change.

We commend the CNPP for focusing on energy balance because food and dietary guidance cannot focus on eating alone. Guidance to follow a healthy lifestyle must include recommendations for healthful eating as well as regular physical activity. The Alliance is in the process of conducting consumer research on energy balance. The purpose of this research is to help us better understand how consumers perceive and try to achieve energy balance as part of their lifestyles, use physical activity and eating as a way to achieve health, and explore ways to communicate the concept of energy balance in a motivating way. We look forward to working collaboratively with CNPP on this project.

Usefulness of the proposed strategies to highlight both motivational and educational messages.

In our research, consumers told us they are tired of negative nutrition messages; *they want to hear what to do, rather than what not to do.* In addition, research tells us they are overwhelmed and confused by the amount of information they receive in regard to nutrition (4, 5). Thus, **it is important to use extensive consumer research to involve consumers and to determine the best messages to motivate behavior change**. Research has determined **that consumers respond well to information based on the following guidelines** (4):

- Provide positive recommendations
- Make messages short and simple
- Provide the benefit in consumer terms
- Deliver guidance that can be individualized by health professionals and/or consumers
- Make messages specific, manageable and actionable
- Make nutrition education fun

In addition, consumer testing can greatly increase success. Message content must be carefully considered. While the healthcare community knows that "calories count" when addressing weight management, it is difficult for consumers to understand and embrace this concept. Consumer research indicates that while consumers are thinking more about portion size and calories, they are not necessarily changing behavior. Further, messages on calories tend to be disregarded by those consumers who either feel they don't have time to worry about their weight

or are not interested in weight loss, and therefore, these are not suitable messages for the public as a whole.

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In 1996, we created the *It's All About You* campaign, which included a logo (above), slogan (*It's All About You*), five core messages (below) and numerous tips. Based on consumer research, the Alliance learned this tiered approach to nutrition education was most effective at motivating action. The logo generated awareness and brand recognition for the messages; the consumer-tested slogan engaged consumers to then adopt the motivating and simple messages. We believe an updated approach to the Food Guide could mirror this approach, using the graphic as the icon that draws consumers in and serves as an educational moment, with a slogan and messages that provide deeper motivation and education.

The *It's All About You* campaign has successfully delivered five core messages regarding healthy eating and active lifestyles along with simple, yet captivating tips that resonate with consumers and allow them to modify the information to meet their individual needs. In addition, this type of messaging helps consumers see that a healthy lifestyle is attainable, realistic and appealing. The *It's All About You* messages and corresponding tips are:

- **Be Realistic**: Make small changes over time in what you eat and the level of activity you do. After all, small steps work better than giant leaps.
  - Park your car in the farthest spot. You'll walk more and burn extra calories.
  - For lower-fat chili or tacos, put cooked ground beef in a strainer and rinse briefly with hot water. Drain well and continue with your recipe.
  - To save calories and fat, use a cooking spray instead of oil to sauté foods.
  - For a refreshing treat and a calcium boost, snack on fruit-flavored fat-free yogurt.

- **Be Adventurous**: Expand your tastes to enjoy a variety of foods.
  - Try a fruit or vegetable you haven't had before. Make it a monthly goal.
  - Enjoy a meal at a Thai, Indian or Japanese restaurant.
  - Prepare one new recipe each month from a favorite magazine or newspaper article.
  - Dig into a different grain: couscous, bulgar, or quinoa, for instance.

- **Be Flexible**: Go ahead and balance what you eat and the physical activity you do over several days. No need to worry about just one meal or one day.
  - Eat a lighter breakfast and lunch to plan for "pizza with the works" for dinner.
  - Don't pack on extra pounds on your vacation. Work in plenty of walking, biking, hiking or volleyball to balance out special vacation meals.

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- Did you splurge on a "soup to nuts" special occasion meal? No problem. Eat lighter and move more for a few days afterwards.
- If you don't want to give up whole milk, balance it out with lower-fat food choices you like.

- **Be Sensible**: Enjoy all foods, just don't overdo it.
  - Slow down! It takes 20 minutes for your brain to send the signal that you've had enough to eat.
  - Have one helping and enjoy every bite.
  - Make your ice cream cone a single, not a double dip.
  - Add calcium to your daily diet the food label way — 20% DV is an excellent source.

- **Be Active**: Walk the dog, don't just watch the dog walk.
  - Set your goal at 30 minutes of moderate activity most days. In 10-minute increments, it's easy.
  - Take a brisk 10-minute walk on your lunch break. You'll feel good and have more energy, too!
  - Hop off the bus a few blocks early and walk briskly the rest of the way.
  - Keep active around the house: sweep the garage, scrub the floors, vacuum the rugs or trim the shrubs. It all helps you get fit—and the house will look great, too!

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

Based on our work with consumers, the Alliance believes guidance must be general enough to be available, accessible and meaningful to a wide population. However, we know that consumers have very individual and distinct perceptions when it comes to following a healthful eating pattern. Therefore, **it is necessary also to provide opportunities for individualized approaches and/or messages that will allow them to personalize nutrition information from the Food Guidance System.**

Consumer research conducted in 2001 by the International Food Information Council Foundation provided direction as to how to individualize nutrition messages and make them more meaningful and useful to the consumer. The research indicated that **Pyramid messages resonate with consumers better when they are tailored to the specific needs and preferences of the individual.** For example, consumers found it more understandable when Pyramid servings for the various food groups were illustrated in the context of foods they eat. For instance, "*Restaurant portions of pasta have 3+ servings from the Bread, Cereal, Rice, & Pasta Group.*" (6) Consumers tell us that personalization allows them to incorporate nutrition messages into their lives. A tip such as, "Grab a banana, a wheat bagel, or a carton of yogurt to eat at your desk" is great for someone who isn't hungry for breakfast before they leave for work.

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

Core messages of the Food Guidance System should be consistent with the guidance and framework of the Dietary Guidelines for Americans, but **these messages should not eliminate the need for an icon that communicates the core guidelines. The icon is an easily recognizable representation of the Food Guidance System and may be the only interface for much of the population.**

The Alliance has tested consumer messages that fit well with CNPP's three message categories: energy balance, nutrient density and chronic disease prevention. We encourage the CNPP to consider these key points when developing a message framework intended to generate behavioral change in consumers. While these are key points, specific tips, such as stated earlier, can easily reinforce and motivate consumers to put these key points into action.

- Energy balance:
  - **Help consumers balance caloric intake with energy expenditure by including a physical activity component to the Food Guidance System.**
    - Be flexible: Balance what you eat and the physical activity you do over several days.
    - Be active: Walk the dog, don't just watch the dog.
- Nutrient density:
  - **Guide consumers to identify and choose foods that are nutrient dense, such as colorful fruits and vegetables, non- and low-fat dairy, whole grains and lean meat.**
    - Be sensible: Enjoy all foods, just don't overdo it.
- Chronic disease prevention:
  - **Provide positive messages to choosing foods that combat chronic diseases instead of focusing on avoiding certain food groups.**
    - Be adventurous: Expand your tastes to enjoy a variety of foods.
    - Be realistic: Make small changes over time in what you eat and the level of activity you do.

Key components for effective interactive educational tools.

According to the IOM Health Literacy report released in April 2004, nearly half of all Americans have difficulty understanding health information and putting that information into practice (7). Updates to the Food Guidance System present an opportunity to communicate dietary guidelines in a way that people can understand and put into action. Research tells us that **effective dietary guidance is driven by what consumers know, believe, value, and do relating to food, diet, and nutrition.** Therefore, like other communications tools, **the graphic, messages and educational materials that are developed for the new Food Guidance System should be based on sound science and comprehensive consumer research.**

Consumers are faced with new nutrition advice and research every day, so they need clear, consistent messages to ensure guidance is meaningful and motivating. **To that end,**

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partnerships, such as the Dietary Guidelines Alliance, are critical to disseminating messages in a powerful and consistent way to make the information even more powerful and relevant for people.

Channels of delivery for the Food Guidance System.

A comprehensive communications campaign surrounding the new Food Guidance System should be developed and incorporate partnerships with industry, health organizations, extension specialists, and leaders in the nutrition and education communities -- as well as utilization of already established and successful grassroots programs, such as *It's All About You* -- to achieve maximum visibility and repetition of key messages. This communications program could deliver dietary guidance through a variety of channels that can reach a wide audience, including at-risk populations, through schools, doctors' offices, hospitals, and community organizations.

In addition, health professionals are vital to ensuring that consumers understand the Food Guidance System and can put the guidelines into practice. The CNPP should develop materials that health professionals and educators can use to relay the tenets of the Food Guidance System.

In closing, consumer testing and strategic partnerships are essential to ensure that the new Food Guidance System reaches consumers with positive, actionable and motivating advice to help improve the health of all Americans. Again, we encourage USDA to strengthen its existing partnership with the Dietary Guidelines Alliance to extend the reach and impact of dietary guidance and provide clear messages to a broader audience.

Thank you for your consideration,

The Dietary Guidelines Alliance

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DIETARY GUIDELINES ALLIANCE

The American Dietetic Association

Chicago, IL

www.eatright.org

Grocery Manufacturers of America, Inc.

Washington, DC

www.gmabrands.com/

National Cattlemen's Beef Association

Centennial, CO

www.beefnutrition.org

National Pork Producers Council

Des Moines, IA

www.nppc.org

Produce Marketing Association

Newark, DE

www.pma.com

Wheat Foods Council

Parker, CO

www.wheatfoods.org

Food Marketing Institute

Washington, DC

www.fmi.org

International Food Information Council

Washington, DC

http://.ific.org

National Dairy Council

Rosemont, IL

www.nationaldairycouncil.org

National Food Processors Association

Washington, DC

www.nfpa-food.org

The Sugar Association, Inc.

Washington, DC

www.sugar.org

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References

1. IPSOS Public Affairs, March 2004. (Interviews with 1,000 adults, margin of error +/- 3.1).
2. Pyramid Servings Data, Results from USDA's 1995 and 1996 Continuing Survey of Food Intakes by Individuals, Table Set 7, Food Surveys Research Group, Beltsville Human Nutrition Research Center, Agricultural Research Service, U.S. Department of Agriculture, http://www.barc.usda.gov/bhnrc/foodssurvey/home.htm, February 1999
3. National Health and Nutrition Examination Survey (NHANES), 1999-2000. http://www.cdc.gov/nchs/nhanes.htm
4. International Food Information Council Foundation. Survey on Food and Nutrition Messages. Conducted by Princeton Survey Associates and Tuttle Communications. December 3, 1999. http://www.newconversation.org/newsite/why_ific/quant.html http://www.newconversation.org/newsite/why_ific/exec.html
5. American Dietetic Association. Nutrition & You Trends 2002. http://www.eatright.org/Public/Media/PublicMedia_10240.cfm
6. International Food Information Council Foundation. The Food Guide Pyramid: It's All About You. Consumer Perceptions of an Educational Brochure: Phase II. Tuttle Communications. August 28, 2002.
7. Institute of Medicine. Health literacy: A prescription to end confusion (report brief). Found at http://www.iom.edu/Object.File/Master/19/726/0.pdf. Accessed August 13, 2004.

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ALLIANCE
For Food & Farming

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Watsonville, CA
Fax:

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August 26, 2004

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

Comments in Response to Federal Register Doc. 04-15710, Vol.69, No. 133

The Alliance for Food and Farming writes this letter in support of a recommendation for the revised Food Guide Pyramid Graphic urging consumers to eat at least 5 to 13 servings of fruits and vegetables per day. Further, we support increased prominence for fruits and vegetables in the revised graphic by placing this important food group at the bottom of the pyramid.

The Alliance for Food and Farming is an organization comprised of approximately 60 different agricultural groups. We work to educate the public and media about issues concerning food safety and farming.

Like many public education organizations, the Alliance for Food and Farming is concerned about the growing health issues associated with improper nutrition in the United States. It is clear that Americans are not consuming enough fruits and vegetables. Educating the public about proper nutrition and the need for increased consumption of fruits and vegetables is crucial in solving many of our nation's health problems. Whenever possible our organization works to combat misinformation about the safety of the U.S. food supply and to encourage increased consumption of wholesome, fresh produce.

We hope that by revising the Food Guide Pyramid to reflect the importance of consuming fruits and vegetables, more Americans will make better nutritional choices and that they will recognize the overwhelming evidence about the health benefits associated with eating fresh produce.

We appreciate your consideration of this letter.

Sincerely,

Marilyn Dolan
Executive Director

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Charter Members
U.S. Rice Producers' Group
Rice Millers' Association
USA Rice Council

Advocate for the Rice Industry

Proctor 1 of 4

August 26 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, Volume 69, No. 133, July 13, 2004**
Center for Nutrition Policy and Promotion, Notice of Proposal for Food Guide Graphic Presentation and Consumer Education Materials

Dear Dr. Hentges:

Thank you for the opportunity to comment on the Food Guide Pyramid graphic and consumer education materials.

USA Rice Federation is a national trade association representing rice producers, millers, and related industry organizations and companies. We conduct nutrition education programs dedicated to educating consumers about the importance of rice in healthy eating, and how rice fits in a variety of nutrition and dietary goals.

As you state, most Americans are familiar with the Food Guide Pyramid, but few follow its recommendations. The rice industry commends CNPP for undertaking a broader Food Guidance System that will use a graphic image as a symbol to represent the overall system, but give greater emphasis to showing consumers how to utilize the specific nutritional guidance information. We are providing the following comments in an effort to help CNPP achieve this important goal.

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

A. Keep the Current Shape

Because the current Food Guide Pyramid accurately depicts the recommended food guidance, and because of its extraordinarily high level of consumer recognition and acceptance, CNPP should build upon the brand equity of the current pyramid rather than change it.

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- The rice industry commends USDA and CNPP for using sound science as the basis for the visual graphic for dietary guidance. The choice of a pyramid shape accurately depicts the intake patterns and messages of variety, proportion and moderation recommended by the Dietary Guidelines and other expert panels including National Academy of Science Institute of Medicine.

- According to USDA's own figures, 80% of Americans recognize the graphic. A 2002 Gallup poll conducted by the Wheat Foods Council showed that 82% of those surveyed agreed that the Food Guide Pyramid is the foundation of a sensible, healthful eating plan. This level of recognition and acceptance is enviably high, and should not be taken for granted or abandoned as USDA works towards the goal of motivating behavior change.

B. Grains Should Form the Base of the Graphic to Convey the Correct Proportion Message

Dietary Guidelines for Americans states: *"Foods made from grains help form the foundation of a nutritious diet. They provide vitamins, minerals, carbohydrates, and other substances that are important for good health. Grain products are low in fat, unless fat is added in processing, in preparation, or at the table."*

To convey the correct proportion message of the food guidance recommendations, grains should be depicted in the "base" of the Pyramid or what ever shape the graphic takes. Whole grains and enriched grains should not be separated.

- According to USDA figures, consumers are not getting the recommended number of grain servings each day. Maintaining grains at the "base" would be important in reminding consumers to choose servings from this primary food group.

- Grain foods provide B vitamins (including folic acid), iron, fiber and numerous other vitamins, minerals and phytonutrients. Grains are convenient, consumer friendly, versatile, easy to store and prepare, well known and accepted in the diet of virtually all cultures. This cannot be said for all of the food groups.

- Grains are important in anti-obesity strategies. As the Dietary Guidelines point out, "Grain products are low in fat, unless fat is added…" Grains also are low in calories. For example, rice has 81-103 calories per half-cup cooked serving and only a trace of fat, making it a good option for weight loss or weight maintenance.

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C. Keep Enriched and Whole Grains Together; Maintain Focus on Enriched Grains, Key Source of Folic Acid, for Important Health Benefits Throughout the Life Cycle

- **Separating whole grains from enriched grains would be confusing to consumers, and could imply that enriched grains are not recommended.**

- **Public policy science on folic acid delivers important health benefits; enriched grains are the key dietary source of folic acid.**

- While we support the goal of consuming more whole grains, it should not be at the expense of enriched grains. As we have observed the Dietary Guidelines Advisory Panel's deliberations, we are concerned that draft language in the panel's documents strongly discourages the consumption of any other type of grain food besides whole grains. We emphatically disagree with this direction and are concerned that it will set up a good food/bad food situation. Therefore, we urge USDA to position enriched rice and grains equally within the grain category in the new Food Guidance system.

- Scientific evidence shows that enriched grains such as enriched white rice have played an overall beneficial role in improving public health. For example, the federal government's mandate to add folic acid to enriched grains to prevent birth defects was a coup of public policy science that has produced dramatic results. The rice industry is proud to participate in a program that has vastly improved infant health. **Having required the grain industries to enrich their products, and since women of childbearing age are advised to seek out and consume such products, it would be a disservice to both the public and grain industries to in any way imply that enriched products are to be avoided. Since it would also be contrary to the government's nutrition advice to women, it would not serve the goal of harmonization of food guidance that USDA and HHS are seeking in the 2005 revisions.**

- Recent information from the Centers for Disease Control highlights the importance of folic acid throughout the life cycle for its role in maintaining heart health. According to new data, heart disease remains the number one illness in America.

- Enriched grains are a key source of folic acid in the diet. The American Journal of Clinical Nutrition published a report showing that enriched grains like rice contribute over 200 micrograms, **or over half of Americans' total daily folate intake.** (1) The folic acid in enriched grains is also more bioavailable than folate found in legumes, fruits, vegetables and even whole grains. Between 1990 and 1999, grain foods were the primary contributor of the three major B vitamins in the diet (2). Grains contributed 60% of the thiamine in the diet, 40% of the riboflavin, and 45% of the niacin. Grain products also contribute 54% of the iron in the diet.

Proctor 4 of 4

II. Usefulness of proposed strategies to highlight both motivational/awareness and educational messages.

A. Overarching Message: Total Calories

- We urge CNPP to re-focus consumers on the importance of **total calories** in healthy eating and weight management. With all the media hype about fad and extremist diets --which create nutritional deficiencies and are difficult to adhere to -- consumers have lost the calories in-calories out focus. Total calories together with added emphasis on the importance of exercise should be the over-arching message of the new Food Guidance System.

B. Channels of Delivery

- USA Rice stands ready to assist USDA with implementation of the new Food Guidance System through our consumer communication programs. We look forward to working with CNPP to accomplish this goal.

Thank you for the opportunity to provide our comments.

Sincerely,

Stuart E. Proctor Jr.

Stuart E. Proctor Jr.
President and CEO
USA Rice Federation

Sources:

(1) EP Quinlivan, J F Gregory III. Effect of food fortification on folic acid intake in the U.S. American Journal of Clinical Nutrition 2003; 77:221-5.
(2) S Gerrior, L Bente. 2002. Nutrient content of the U.S. Food Supply, 1990-99. A Summary Report. USDA/CNPP. Home Economics Research Report No. 55.

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AUG 27 2004

North American Millers' Association
Washington, DC
www.namamillers.org

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August 26, 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 Proposal for Food Guide Graphic Presentation and Consumer Education Materials; Opportunity for Public Comment

Dear Dr. Hentges:

Thank you for the opportunity to comment on the Food Guide Graphic and consumer education materials used to interpret the Dietary Guidelines for Americans. NAMA (North American Millers' Association) is the trade association representing more than 95 percent of the grain dry milling industry. NAMA's 46 members operate 170 wheat, corn and oat mills in 38 states. They collectively produce more than 160 million pounds of milled grain products each day.

Below are comments on the six areas in which you requested guidance in the Federal Register:

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.*

NAMA recommends the Food Guidance System graphic remain a pyramid. The pyramid shape has developed considerable consumer recognition. A Gallup survey (2002) conducted for the Wheat Foods Council showed 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 healthy eating plan. With that kind of recognition already developed, the pyramid is a powerful tool to gain the attention of consumers.

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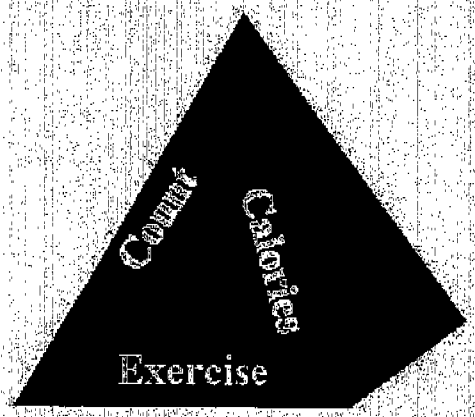
The only disadvantage of keeping the pyramid graphic is that the consumer may not pay attention to the dietary guideline changes; associating the pyramid with the dietary guidelines previously established. However, surveys show that less than six percent of Americans follow the pyramid. This would indicate the graphic is not the determining factor in following the guidance. The greater challenge is establishing motivating messages and educational materials that will make a difference. Knowing that financial resources are always limited, it would seem more appropriate to put funding into marketing the messages and educational materials than into promoting a new graphic.



You can add some change to the look of the pyramid and enhance the message by adding the words "exercise" at the base and "count," "calories," on each side as illustrated here.

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

NAMA supports using the pyramid as a graphic symbol in conjunction with a slogan and core messages. The current pyramid already has good recognition and is used widely by industry. Continuing to use the pyramid to represent the Food Guidance System to the public and to identify/brand Food Guidance System materials is a good strategy. With a concise slogan attached, it will create awareness for the educational messages you want to deliver. Messages should include both the healthy eating and exercise components.

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

We agree that there must be some universal messages. These should deliver a simple message for a broad audience.

Individualized guidance will be more useful to consumers who want to follow a plan. Going back to the Gallup Poll results, 86 percent of those polled recognized the pyramid as a healthy eating plan. Less than 10 percent reported actually following the guidelines. You can assume less than 10 percent of the population will use interactive personalized guidance tools.

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

Since less than 10 percent of the population follows the pyramid guidelines, it makes sense to focus on core messages and not the graphic to provide detailed educational messages. To be effective, the messages should be simple. Example: Count calories. Count steps.

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E) Key components for effective interactive educational tools.

Key components of an effective interactive educational tool are easy to use, easily accessible, rewarding, and fun. The tool will not be used if it is not marketed to the consumer. The consumer will not use the tool if they do not know it exists.

We do not believe the Interactive Healthy Eating Index (IHEI) and Interactive Physical Activity Tool (IPAT) are effective tools. The consumer is not aware of the indexes. Buried in CNPP's web site, they are laborious to use. The indexes would be more effective if they were in a web site that had a memorable name.

Using the pyramid as a linking icon, a stand-alone web site for the Food Guidance System could include all educational materials for the System as well as links to the indexes. Sample menus and recipes may help the site become more rewarding. Encourage the private sector to hyperlink to the web site by putting the pyramid/slogan icon on the home page of their web site. When viewers mouse over the pyramid graphic, they are linked to the web site.

Or, the pyramid could have a space to enter your birth year resulting in a link to ideal weight and activity levels depending upon your gender.

This idea comes from an online service provided by Capitol Advantage. Capital Advantage offers a service called CapWiz that links Internet users to their Congressional representatives when they enter their zip code into a graphic of the Capitol dome. You can see how it works by visiting NAMA's web site at http://www.namamillers.org.

Other possible tools to consider: slide charts or wheels, calorie counters, and pedometers.

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

The Internet is a wonderful tool and accessed by a large segment of the population. It is not likely to be used to a great extent by the elderly or lower income families. A portion of the population simply won't spend the time to "search the net."

A large number of consumers will be impacted by messages that are simple and concise.

Ideas for delivering messages:

- Provide posters, brochures, slide charts, and counters to the offices of healthcare providers.
- Prepare a series of one-minute video messages for use in the offices of healthcare providers, Channel One programming at schools, retail grocery stores and airport terminals.
- Develop a healthy eating lesson plan that teachers can download from the Internet.
- Offer family nutrition classes to expecting mothers through their healthcare provider.

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- Offer a family nutrition class to parents of children entering school.
- Form a partnership with retail grocers such as Wal-Mart.

Mothers, followed by teachers, are the primary audiences to target. Children eat what their parents and teachers prepare for them. Mothers plan family meals, prepare the meals, and do the shopping. Mothers decide whether or not to stop at a fast food restaurant or prepare their family meal at home. Mothers prepare school lunches for their children.

First time expectant mothers are particularly open to receiving nutritional messages. First time mothers are looking for guidance and information on raising healthy children.

Given the proper educational materials, teachers can develop curriculums to convey the desired messages. Teachers can reinforce what is practiced at home.

NAMA applauds CNPP's initiative to review and update the Food Guide graphic and educational materials for professionals and consumers. We appreciate the opportunity to provide our ideas.

Sincerely,

Betsy Faga

Betsy Faga
President

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August 26, 2004

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

Comments in Response to Federal Register Doc. 04-15710, Vol.69, No. 133

The California Tree Fruit Agreement (CTFA) writes this letter in support of a recommendation for the revised Food Guide Pyramid Graphic urging consumers to eat at least 5 to 13 servings of fruits and vegetables per day. Further, we support increased prominence for fruits and vegetables in the revised graphic by placing this important food group at the bottom of the pyramid.

Our organization is especially concerned about growing health issues concerning poor nutrition among children. In 2004, the California Tree Fruit Agreement launched the "Healthy Kids" promotion which emphasized the importance of consuming more fruits and vegetables and specifically provided fun and tasty ways to include more peaches, plums and nectarines in kids' diets. Since the Food Guide Pyramid is an important learning tool in many classrooms, increased prominence for fruits and vegetables in the graphic will provide an important foundation for programs like CTFA's "Healthy Kids."

As the nutrition community is well-aware, produce organizations often fight a difficult battle competing against high-fat, high sodium processed foods. Revising the Food Guide Pyramid to reflect the importance of fresh fruit and vegetables in the diet is one way the government can help fruit and vegetable producers communicate to consumers the benefits of our healthful products.

We appreciate your consideration of this letter.

Best regards,

BRRLL

Blair R. Richardson
President

cc: Elizabeth Pivonka

By Federal Express Overnight

WESTERN GROWERS™

Fresh produce from our families to yours.

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August 24, 2004

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

RE: Center for Nutrition Policy and Promotion; Notice of Proposal for Food Guide Graphic Presentation and Consumer Education Materials; Submission of Public Comment

Dear Sir or Madam:

Western Growers Association represents 3,000 growers, shippers and packers of specialty crops who produce 90 percent of the fresh vegetables and nearly 70 percent of the fresh fruit and nuts grown in Arizona and California, or about one-half of the nation's fresh produce. Since the organization was founded in 1926, Western Growers has been dedicated to increasing the production and consumption of fruits, vegetables and nuts domestically and abroad through legislative efforts, industry partnerships, science and technical guidance and promoting nutrition through consumer education and advocacy. In addition, the association also provides health insurance to tens of thousands of families in both states. Our interest has always been in maintaining the health of those families and businesses.

With the restructuring of the Food Guide Pyramid, Western Growers is fully supportive of the Department's reassessment of the national policy towards nutrition, including the recommendation to increase the daily intake of fruits and vegetables. With rising childhood obesity and diet-related diseases, it is imperative that families be provided with guiding nutrition principles to promote a healthier lifestyle and diet. The average American consumes only 1.5 servings of fruits and 3.3 servings of vegetables daily. Americans are lacking in vital nutrients, including vitamins A, C and E and the minerals potassium, calcium and magnesium. The most efficient and cost-effective way to get these nutrients is by eating fruits and vegetables. Western Growers strongly supports the revised Food Guide Pyramid's recommendation of the consumption of at least five and as many as 13 servings of fruits and vegetables per day.

Mailing Address: Newport Beach, CA **Street Address:** Irvine, CA
T **F:** **Internet:** www.wga.com

Mc Inerney
2 of 2

Science continues to promote the benefits of fruits and vegetables, such as greatly reducing the risk of diseases, including cancer, diabetes and heart disease. Most recently, an antioxidant in blueberries has been found to lower cholesterol. Almost daily, we learn more and more about the healthful results of increasing our intake of fruits and vegetables, but yet 85 percent of all Americans do not eat the recommended daily five servings per day. Western Growers believes it is critical that this process look at opportunities to enhance key message points directed at consumers and thus provide the most accurate help to consumers in order to close the gap between actual intake and recommended intake, and encourage the highest consumption of a variety of fruits and vegetables in their daily diet.

Our association would also recommend that the final iteration of the dietary guidelines encourage the consumption of foods that are lower in fat, sugar and sodium. Fruits and vegetables are naturally low in fat and sodium, but we would also support the usage of the "low fat" or "lean" designations.

Western Growers, while open minded to a graphic shape other than a pyramid, strongly encourages that should the current pyramid shape stay in place, fruits and vegetables would be an appropriate cornerstone displayed at the bottom of the pyramid to emphasize the recommended increased consumption of produce as suggested by the Dietary Guidelines Advisory Committee.

We also encourage coordination among government agencies to promote the Guidelines, including the school lunch program, as well as other programs which are designed to educate Americans on a healthy lifestyle.

Thank you for your consideration in accepting these comments.

Sincerely,

Matthew M. McInerney

Matthew M. McInerney
Executive Vice President
Western Growers Association

A. L. Gilbert Company
Oakdale, California
Fax
Since 1892
Bulk Dairy Feeds Sacked Feeds Liquid Feeds Field Seeds

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August 26, 2004

Food Guide Pyramid Reassessment Team
U.S.D.A. Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria VA 22302

Dear Reassessment Team:

We would like to take this opportunity to thank the U. S. Government and U.S.D.A. for studying the values represented in California's milk standards. You went the distance for California consumers in protecting our concerns in the 1995 Farm Bill. Thank you!

Since the need for any standards is being debated, we would like to share with you a description of the values we perceive in California Milk Standards:

- California's four milk choices of whole, reduced fat or 2-10, low fat or 1-11 and non fat provide a nice variety of choices that families make use of for individual needs. Of these choices the formula that we choose for ourselves can be counted on to be consistent in flavor, taste and nutrition, because the variability of the milk solids in each choice is minimized. Total milk solids are always consistent and that allows us to have confidence in our choice and be comfortable that we will get a consistent favor and taste. We know what we are going to get, each time.

- Another value that we receive in our California Milk Standards is one of economic value. By having the milk solids at a consistent level we know that the cost value of each unit of protein, calcium, vitamin and energy levels are maximized. Also of importance when analyzing the value or cost per unit of nutrient is to know that the packaging, shipping and retailing of a consumer food product is a large portion of the cost. Take the example of bottled milk or bottled water. Both products have a large cost associated with getting the nutrients to the consumer. However if protein and calcium is what you are paying for, it helps that the contents of the container is nutrient dense, in order to deliver that nutrient most economically. By standardizing with very few variables, we know we are maximizing our economic value through increased nutrient density. In

California the nutrient density in our reduced fat, 2-10 and 1-11 is also enhanced by adding solid-not-fat to make up for the removal of fat. First, by making the total milk solids similar to that of whole milk, flavor and taste is enhanced. Secondly, the added nutrient density per serving allows for greater economic value per unit of nutrient.

- There is an additional value the consumer gets by having the consistency of our milk choices and that is performance. By having a good understanding and a confident attitude in the foods we eat, we can prepare for the tasks of thinking, doing physical work, or better endurance. The results are like having an extra person on your side or a hidden advantage when it comes to your performance. This value is something we all need in order to contribute fully to society.

Concerning the current Federal Whole Milk Standard:

- For the reasons stated above, we eagerly encourage you to strengthen the Federal Whole Milk Standards of solids-non-fat, proteins and fat so that flavor, taste, consistent nutrition, economic value and confidence in the product are enhanced. Putting in the milk solids, equivalent of what the cow produces will provide a standard that is reliable and consistent.

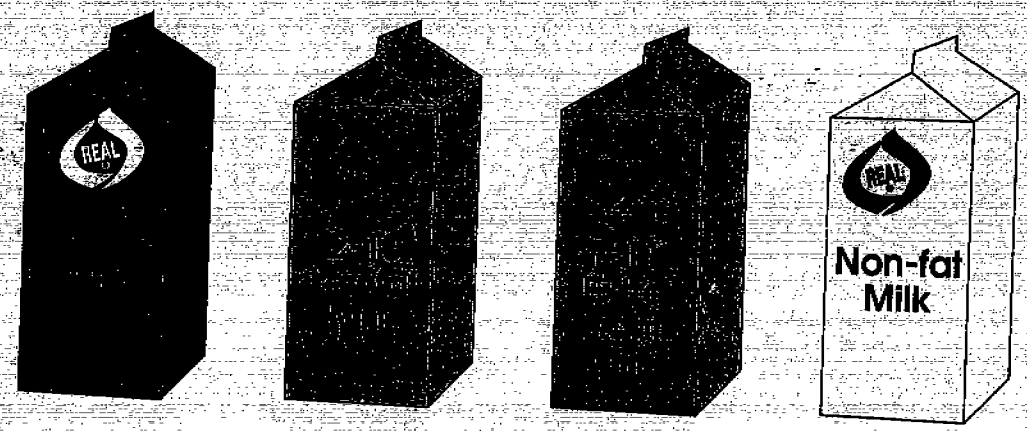
Sincerely,

William M. Daly

William M. Daly
A. L. Gilbert Company

"High 5 for Milk"

Reduced fat Low fat



Daily

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- 76% of the CALCIUM needed for your bones and teeth
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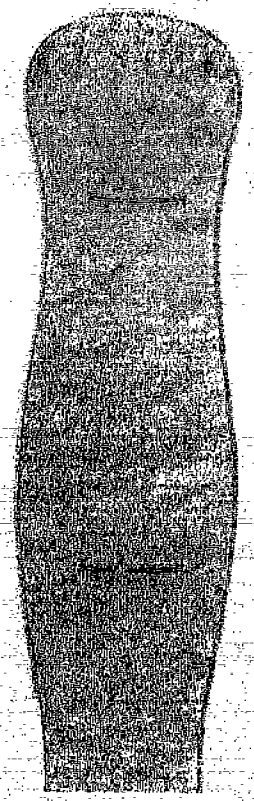

To allow for your body's peak performance CALIFORNIA MILK STANDARDS offer 4 ENERGY choices. Designed to fit your own individual need.

Enjoy 2-4 servings of dairy products daily.

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WHITE Technical Research

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Comments on the Proposed Plan for Revising the Food Guide

White 1 of 2

27 August 2004

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

Dear Sirs:

Please accept this submission, made on behalf of the Corn Refiners Association, in response to the Federal Register notice dated July 13, 2004 concerning proposals for the food guide pyramid and consumer education materials. The Corn Refiners Association of Washington, DC is the trade association that represents the corn wet milling industry.

Our firm, White Technical Research, is located in Argenta, IL. With 25 years experience in nutritive sweetener chemistry, metabolism and nutrition, we provide technical research services to the food and beverage industry. The Corn Refiners Association is one of our clients.

In testimony before the Committee on August 19, 2004, Bill Sanda, Director of Public Affairs for the Weston A. Price Foundation, urged USDA to recommend a decrease in the consumption of highly processed foods, especially foods containing high fructose corn syrup (HFCS). Mr. Sanda's testimony, however well-intentioned, is without scientific merit. His testimony confuses the identity, composition, chemistry and metabolism of common sweeteners; incorrectly extrapolates studies conducted at unphysiologically high fructose concentrations to HFCS; misquotes sweetener production and daily intake values; and reports anecdotal evidence as though it were fact.

It is important to recognize that HFCS is not pure fructose. Rather, HFCS is comprised of approximately equal amounts of glucose and fructose. For this reason it is inappropriate to extrapolate studies conducted with fructose to HFCS: the two are neither equivalent in composition nor metabolic response. Further, many of the studies referenced by Mr. Sanda were conducted at very high levels of fructose - levels that are rarely encountered, even in the most extreme diets. These studies have been dismissed by expert scientific panels, including the

wtrg@argenta.net

Fructose Nutrition Review of 1993, published in the American Journal of Clinical Nutrition.

We urge the Food Guide Pyramid Reassessment Team to maintain its focus on the total diet, rather than on single ingredients. We support your assertions regarding the importance of energy balance in maintaining good health and the lack of a unique role for simple sugars in promoting disease.

As you correctly conclude, there is little difference in glucose-to-fructose ratios among common nutritive sweeteners like sucrose, HFCS, honey, invert sugar, and many fruits and juices. Consequently, there is also little difference in the absorption and metabolism of these sweeteners.

Despite the current rash of statistical associations, there remains no evidence of a credible scientific relationship between carbohydrate intake and the incidence of either type 1 or type 2 diabetes. The only verified role of simple sugars in the development of obesity is their contribution, along with other macronutrients, to the total caloric load.

It is important to remember that the U.S. Food & Drug Administration (FDA) awarded HFCS "Generally Recognized as Safe (GRAS)" status in 1983. FDA reaffirmed GRAS status for HFCS again in 1988 and 1996 after careful review of the scientific literature.

Today's busy lifestyles require ready access to nutritious, appealing foods in shelf-stable, easy-to-prepare forms. Without the availability of nutritive sweeteners like those above — with their important functional properties — the successful manufacture of many products would not be possible.

Respectfully yours,

John S. White

John S. White, Ph.D., President
White Technical Research

wtrg@argenta.net

National Sunflower ASSOCIATION

Bismarck, ND USA
Phone:
Fax:
www.sunflowernsa.com

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

August 27, 2004

Dear Food Guide Pyramid Reassessment Team:

Sunflower seeds are power packed with healthy fats, protein, fiber, minerals, vitamin E and phytochemicals.

Sunflower Seeds are Nutrient Dense
Sunflower seeds are nutrient dense and should be mentioned by name in the proposed Daily Food Intake Patterns. Most Americans are not currently meeting the requirement for vitamin E. Sunflower seeds are an excellent source of hard-to-get vitamin E (1,2) and they contain mostly healthy unsaturated fats, which help with the absorption of vitamin E.

According to the USDA National Nutrient Database for Standard Reference, Release 17, a single serving (one ounce) of sunflower seeds provides 71% of the Recommended Daily Allowance for vitamin E, the highest of any whole food (1). In addition, sunflower seeds provide 9% of the Daily Value for magnesium, 17% of the Daily Value for folate, 4% of the Daily Value for potassium, and 8% of the Daily Value for fiber (1), nutrients which the Dietary Guidelines Committee 2005 has identified as lacking in American diets.

Therefore, sunflower seeds fit into the Food Guidance System proposed core message to "Promote nutrient dense food choices to increase intake of vitamins, minerals, fiber and other key nutrients, especially those that are often low in typical diets."

Proposed Core Messages—Substituting Unsaturated Fats for Saturated Fat
Scientific evidence proves that substituting unsaturated fats in place of saturated fats in the diet is beneficial for health (3). We support Food Guidance System proposed core messages intended to "lower chronic disease risk by lowering intake of saturated fats, trans fats, cholesterol, [etc.]." Moreover, a substitution message that advises consumers to consume unsaturated fat foods with high nutrient density, like sunflower seeds, in place of saturated fat foods, would optimize consumer education efforts.

Thank you for your consideration.

Best Regards,

Larry Kleingartner
Executive Director

References:
1. USDA National Nutrient Database for Standard Reference, Release 17. July 2004. Accessed August 25, 2004.

2. US Food and Drug Administration. A Food Labeling Guide—Appendix B. Relative (or comparative) Claims. September 1994, Revised June 1999. Accessed February 9, 2004. http://vm.cfsan.fda.gov/~dms/flg-6b.html
3. Ascherio A, Willett, WC. Trans fatty acids and coronary heart disease. *New England Journal of Medicine*. 1999;340:1994-8.

Kleingartner

2 of 4

National Sunflower ASSOCIATION

Bismarck, ND USA
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www.sunflowernsa.com

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

Kleingartner
3 of 4

August 27, 2004

Dear Food Guide Pyramid Reassessment Team:

A new variety of sunflower oil, NuSun™, is a highly stable and healthful unsaturated oil. It can be used in commercial food applications without contributing trans fat, as most other unsaturated oils do.

Food Guide Pyramid Graphic
Currently, all fats and oils are placed at the top of the pyramid in the "use sparingly" section, which causes confusion. A distinction should be made between healthy unsaturated fats and oils and saturated and trans fats, which are known to be harmful to health. Healthful unsaturated oils are essential to the diet and should appear near the bottom of the pyramid, or if another graphic is used, they should appear in the "consume regularly" section.

Proposed Core Messages—Substituting Unsaturated Fats for Saturated and Trans Fat
Scientific evidence proves that substituting unsaturated fats in place of saturated fats and trans fats in the diet is beneficial for health (1). We support Food Guidance System proposed core messages intended to "lower chronic disease risk by lowering intake of saturated fats, trans fats, cholesterol, [etc.]." Moreover, a substitution message that advises consumers to use unsaturated fats in place of saturated fats would be most helpful to consumers.

Researchers at The Pennsylvania State University recently compared healthful diets with either NuSun™ sunflower oil or olive oil, to the average American diet. Preliminary results from this clinical study show that substituting small amounts of NuSun™ sunflower oil daily in place of saturated fat had a significant cholesterol lowering effect, proving that small changes in the fat profile of the diet can have big benefits to health (2).

Decreasing Both Trans and Saturated Fats in the Diet
NuSun™ sunflower oil does not require hydrogenation and is naturally trans fat free. From a health stand point, NuSun™ sunflower oil also is low in saturated fat.

NuSun™ was developed by standard breeding techniques and is therefore, a natural, non-transgenic cooking oil. NuSun™ sunflower oil works extremely well in commercial cooking and frying, with a smoke point of 450° and a clean light taste. In addition, the natural stability of NuSun™ sunflower oil enhances product fry-life and shelf-life.

Thank you for your consideration.

Best Regards,

Larry Kleingartner
Executive Director

Kleingartner 4 of 4

References:

1. Ascherio A, Willett, WC. Trans fatty acids and coronary heart disease. *New England Journal of Medicine*. 1999;340:1994-8.
2. Abstract 7930 (revised). Experimental Biology 2003, San Diego, CA.

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THE Peanut Institute

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

August 27, 2004

Dear Food Guide Pyramid Reassessment Team:

Based on a substantial amount of research, peanuts and peanut butter can and should be a part of an energy-balanced, heart-healthy, cholesterol-lowering diet (1,2). Peanut butter and peanuts should specifically be included in dietary guidance for the core messages.

Proposed Core Messages

a. *Keep caloric intake balanced with energy expenditure to prevent weight gain, promote weight loss, and/or maintain a healthy weight.*
   - A weight-loss study conducted at Harvard School of Public Health showed that dieters actually lost more weight and kept it off when they could include small amounts of peanut butter and peanuts in their daily diets (3).
   - Research shows that peanuts satisfy hunger and keep people feeling full longer than other snack foods, suggesting that they may be helpful in promoting energy balance (4). Peanut butter and peanut-users also have lower body mass index scores versus non-peanut users (5).

b. *Promote nutrient dense food choices to increase the intake of vitamins, minerals, fiber and other key nutrients, especially those that are often low in typical diets.*
   - Peanuts and peanut butter provide an economical source of protein and many other nutrients such as vitamin E, magnesium, fiber and folate, which have been identified by the Dietary Guidelines Committee 2005 as lacking in American diets.
   - Data from the 1994-96 Continuing Survey of Food Intakes by Individuals (CSFII) shows that peanut butter and peanut-users had an improved diet quality versus non-users. They had higher intakes of vitamin A, vitamin E, folate, calcium (62% of peanut butter sandwiches are consumed with milk), magnesium, zinc, iron and dietary fiber. Further, peanut-users had lower intakes of bad saturated fat and cholesterol, versus non-peanut users (5).

c. *Lower chronic disease risks by lowering intake of saturated fats, trans fats, cholesterol, sodium, and other food components that are often consumed in excessive amounts.*
   - A Food and Drug Administration qualified health claim already exists that recommends that Americans consume1.5 ounces of peanuts daily to prevent cardiovascular disease (6).
   - It should also be noted that not all food sources of solid fats are harmful to health. A substitution message that advises consumers to use unsaturated, plant-based fats and oils in place of saturated fats (e.g., a peanut butter sandwich in place of a deli sandwich) would be more instructive.

Powell 2 of 2

Peanuts and Peanut Butter Should Be Included in Food Guide Pyramid Graphics

Because almost 80 percent of the "nuts" eaten in the US are peanuts and peanut butter (7), we feel it is important to make consumers aware of their position in a healthy diet by including them visually and in the descriptive wording on the Food Guide Pyramid, or whatever the final graphic might be.

Proposed Daily Food Intake Patterns

Peanut butter and peanuts are one of the favorite and most frequently eaten foods in the US. The current nomenclature of the proposed daily food intake patterns does not seem to provide the correct identification of these foods that research shows should be eaten daily.

a. Meat and Beans Group

Peanut butter and peanuts are technically in the legume family, which represents how they are often eaten in other cultures or in the South as boiled peanuts. However, they are most widely consumed as peanut butter (sandwiches and with fruits and vegetables) or as peanut snacks, similar to nuts. Since "nuts" could be interpreted as only "tree nuts," the description of food items included in this group should read as one of the following:

...eggs, peanuts, nuts and seeds, OR
...eggs, nuts, (including peanuts), and seeds, OR
...eggs, peanut butter, nuts and seeds.

This would be reflective of consumer intake since "nut" consumption is over one third peanut butter, one third peanuts and approximately one third all nine tree nuts combined.

b. Vegetables—Legumes

Peanut butter and peanuts should also be included in the "legumes" subgroup of the "vegetables" group, since they are technically in the legume family.

Thank you for your consideration.

Sincerely,

John T. Powell

John T. Powell
President

References

1. Kris-Etherton PM, Pearson TA, Wan Y, Hargrove RL, Moriarty K, Fishell V, Etherton TD. High-monounsaturated fatty acids lower both plasma cholesterol and triacylglycerol concentrations. *American Journal of Clinical Nutrition*. 1999;70:1009-1015.
2. Kris-Etherton PM, Guixiang Z, Binkoski ME, Coval SM, Etherton TD. Special article: The effects of nuts on coronary heart disease risk. *Nutrition Reviews*. 2001;59(4):103-111.
3. McManus K, Antinoro L, Sacks F. A randomized controlled trial of a moderate-fat, low-energy diet compared with a low-fat, low-energy diet for weight loss in overweight adults. *International Journal of Obesity*. 2001;25:1503-1511.
4. Alper CM, Mattes RD. Effects of chronic peanut consumption on energy balance and hedonics. *International Journal of Obesity*. 2002;26:1129-1137.
5. "Dietary Patterns for Families," Scientific Presentation by Penny Kris-Etherton, PhD, RD. American Dietetic Association Meeting, October 19, 2002.
6. Nuts and coronary heart disease. (Docket No 02P-0505). July 2003. http://www.cfsan.fda.gov/~dms/qhcnuts2.html
7. *Federal Register*. September 11, 2003. Vol. 68, No. 176.

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Chor San Khoo, Ph.D.
Vice President – Global Nutrition & Health

Campbell Soup Company

Camden, NJ (

Phone
Fax

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August, 27, 2004

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

Attn: Dr. Eric Hentges, Executive Director

Re: Notice of Proposal for Food Guide Graphic Presentation and Consumer Education Materials

Dear Dr. Hentges,

Campbell Soup Company ("Campbell") is a global manufacturer and marketer of high quality soup, sauces, beverages, biscuits, confectionery and prepared food products. The Company is 135 years old, with $7 billion in annual sales and a portfolio of more than 20 market-leading brands.

We applaud the efforts of the USDA Center for Nutrition Policy and Promotion (CNPP) to revise the current Food Guidance System ("System") to make it simpler, more effective and more understandable to the general public. This undertaking is necessary to improve the nutritional and health status of the American population. We agree with you that a multi-component System is crucial for achieving the goals set forth in the Notice and for translating those goals into positive food choices and dietary actions.

We offer the following response to your request for comment on topics of particular interest:

COMMENTS CONCERNING THE MOTIVATIONAL/AWARENESS COMPONENTS

1. **Even though the current pyramid graphic benefits from significant public awareness, we recommend that it be replaced by a different graphic that is more easily understood by consumers and more likely to motivate behavior change than the existing graphic.**

We created and engaged one of the world's largest independent consumer research organizations to test a number of different graphics and have attached a report of the results of that research as Attachment A. The research investigated the attitudes of 1100 consumers in a quantitative national study conducted this month. As you can see from Attachment A, we found that circular or rounded graphics were significantly preferred over the current graphic for: (a) being easier to understand, (b) being more visually appealing, (c) best explaining what a healthy diet should include, (d) having more impact on guiding food decisions, and (e) being more motivating to change behavior. Including a figure of a runner also reinforced the notion and importance of regular physical activity.

A graphic that we have designated as "Rings" performed very well with consumers and was the strongest of all of the options tested, including the current food guide pyramid, especially on the dimension of motivating a change in behavior. For your convenience, we have also included, as Attachment B, what we recommend as an improved version of this distinctive graphic.

Khou 2 of 30

A consumer preference for a circular shape is consistent with USDA's 1992 findings, where consumers found a bowl shape to be more appealing than a pyramid, especially in conveying variety.

Although one should not casually depart from a graphic that has been used over a period of time, it is more important that a graphic be effective in communicating the desired messages than that it be already well known. The anticipated investment in the educational campaign will provide the awareness that the pyramid graphic already has.

2. The graphic should communicate a limited number of essential messages so as to avoid confusion. Those messages should be limited to: (a) variety, (b) proportionality, (c) moderation, (d) exercise, and (e) the benefit of following this holistic advice.

We agree that burdening the graphic with too much information will prevent it from effectively communicating any of the information. On the other hand, we believe that it is essential to add two elements to the graphic as essential parts of a motivating basic message addressing change in overall lifestyle. The first of those elements is exercise. It is well accepted that exercise is an essential component of maintaining a healthy weight and maintaining basic fitness. The graphic should remind consumers of this in a motivating way. The second new element is a statement of the benefit of following dietary guidelines and exercising. One way to express that benefit is in terms of "feeling good."

We believe the study referenced in Attachment A supports the effectiveness of incorporating exercise and feeling good messages in a graphic. All test graphics included the phrase "EAT RIGHT. BE ACTIVE. FEEL GOOD." Even though the graphics designated as "Black Bowl" and "Revised Pyramid" did not perform as well as the current pyramid, their performance on the attribute "Is more motivating to change your behavior" was directionally better than their performance on the other attributes tested. The "Rings" graphic stands out on the "is more motivating to change your behavior" attribute, presumably because the call to action "EAT RIGHT. BE ACTIVE. FEEL GOOD" was reinforced with a figure of a runner. It was the only graphic to include such a figure.

The recommended graphic (included as Attachment B-1) adds the language "EAT RIGHT. BE ACTIVE. FEEL GOOD," used for the purposes of testing, under the design, adds an additional running figure, and does not include specific serving range recommendations.

3. The graphic should not specify numbers of servings, because these recommendations should vary according to people's individual needs, and providing numbers adds confusion.

For many people, the numbers of servings specified on the current food guide pyramid are not appropriate. Any core graphic for the Food Guide System should be valid for all Americans. In addition, specifying the numbers of servings adds confusing detail to the graphic, and does not substantially enhance the communication of proportionality and moderation conveyed by the recommended graphic. Information about the numbers of recommended servings should be included in the educational components because they vary according to the factors described below in item 7. For your convenience, the recommended graphic modified to include serving ranges is included as Attachment B-2. Further research is needed to better understand whether specifying a wide range of recommended numbers of servings on a graphic (with no explanation) is helpful or confusing to consumers in motivating a change of behavior.

COMMENTS CONCERNING THE EDUCATIONAL COMPONENTS

4. The serving sizes used in consumer education materials and label serving sizes should be the same.

Serving sizes are confusing to consumers. The size of a "serving" is not readily apparent, especially given the sizes of servings to which consumers have become accustomed. This is, obviously, compounded if official dietary guidance and government mandated nutritional information are based on different serving sizes.

5. **It is important to teach consumers how to incorporate processed foods into dietary planning.**

More than 60% of the food Americans consume is processed food. Processed foods are more affordable and accessible to people than fresh foods. This makes it important that dietary guidance teaches people how to incorporate processed foods into their diets. Not including processed foods in recommendations also perpetuates the mistaken belief that processed foods are not as nutritious as fresh foods. People should be taught how to use the foods that are available to them effectively.

6. **Recommendations for servings of grains should remain the same. However, dietary guidance should include a substantial increase in the servings of fruits and vegetables to a level at least double the current recommendation. It should also emphasize the contributions of food sub-groups so as to encourage variety, including a specific recommendation to consume three or more servings of whole grains.**

Current scientific evidence supports a very significant increase in the recommendations for consumption of fruits and vegetables, as well as a specific recommendation of servings of whole grains.

7. **We agree with CNPP that food choice and serving size recommendations should be tailored to sub-groups of the population. Specific recommendations should be contained in educational materials and should not be included in the graphic.**

Indeed, one recommendation does not fit all. Appropriate food choice and serving size recommendations depend upon a person's age, sex, anthropometrical state (height and weight), ethnicity, physical activity, and physiological state (e.g., pregnancy, lactation, disease condition, and disease risk status). Different recommendations concerning intake of saturated fats and cholesterol may be made, for example, for people at risk for heart disease.

We appreciate the opportunity to comment on this Proposal, and are available to support you in your efforts to make the Food Guidance System more effective in fulfilling its mission.

Sincerely,

Chor San Khoo, Ph.D.

Attachment

(Attachment A)

Balanced Lifestyle Guide Project

PREPARED FOR: Campbell's

PREPARED BY: Synovate

DATE: August 27, 2004

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I. Background & Objectives

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Background:

The USDA creation of the Food Pyramid was originally intended to help Americans make choices that 1. were adequate in meeting nutritional standards but 2. moderate in energy level and in food components often consumed in excess. Its goal was to make "total diet" recommendation.

Learning that most Americans are familiar with the Food Pyramid Guide, but few follow the recommendations, the USDA seeks to develop a new consumer presentation to help motivate consumers to improve their food choices.

Aware that the USDA was seeking input to create a food guidance system that is more effective, more comprehensible and simpler for general public usage, the Campbell Soup Company fully supported this effort. Campbell's hired an independent, global market research company, Synovate, and initiated a primary research project to explore alternative graphic designs. Four different graphic depictions were created for consumer evaluation.

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About Synovate

Synovate, formed in 2001 (formerly Aegis Research) and branded as Synovate in 2002, was acquired by the Aegis Group plc in London in 1999. In the United States, Synovate includes the former Market Facts Inc., founded in 1946 and based in Chicago; BAIGlobal; Strategy Research Corp.; MarkTrend Research Inc.; Copernicus Inc. and IMR Research Inc.

Robert Philpott is CEO of Synovate in the Americas and Adrian Chedore is worldwide CEO for Synovate.

Synovate is a top global research company, operating in 47countries and employing more than 3,300 people. The company generates consumer insights that drive competitive marketing solutions and provides a broad range of market intelligence services - using powerful and established methodologies, as well as innovative and tailored solutions.

Synovate's clients range from Fortune Global 500 conglomerates to entrepreneurial start-ups and come from all sectors of industry, including consumer packaged goods, petrochemicals, media and advertising, government, fast food, health care, technology and more.

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Research Objectives:

The objective of this research was to obtain consumer feedback on the strengths and weaknesses of various graphic designs, specifically: ease of understanding, communication of a well balanced diet, and the ability to motivate a change in behavior.

Additionally, the research was to offer the USDA graphic design options with improved communications for an improved Food Guide.

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II. Methodology

Library
9-16-20

Methodology:

A five-cell, protomonadic test was conducted via the internet using Synovate's ePanel. The end sample size was n=1,100.

Among four of the five cells, 200 interviews per cell were conducted among a nationally representative sample of adults, aged 18-69, 80% female/20% male. In these cells, respondents were shown one of four alternative food guide graphic depictions, asked for monadic evaluations and then were exposed to the current food guide pyramid to obtain preference on key measures.

The fifth cell, with 300 interviews, always exposed the current food pyramid first, obtained the monadic evaluation, and the respondents were shown one of the four alternative test designs to get preference on the same key measures (n=75 per test design).

On all tables, lower case letters represent significantly higher than column indicated at the 80% level of confidence; capital letters represent significantly higher than column indicated at the 90% level of confidence.

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II. Graphic Designs

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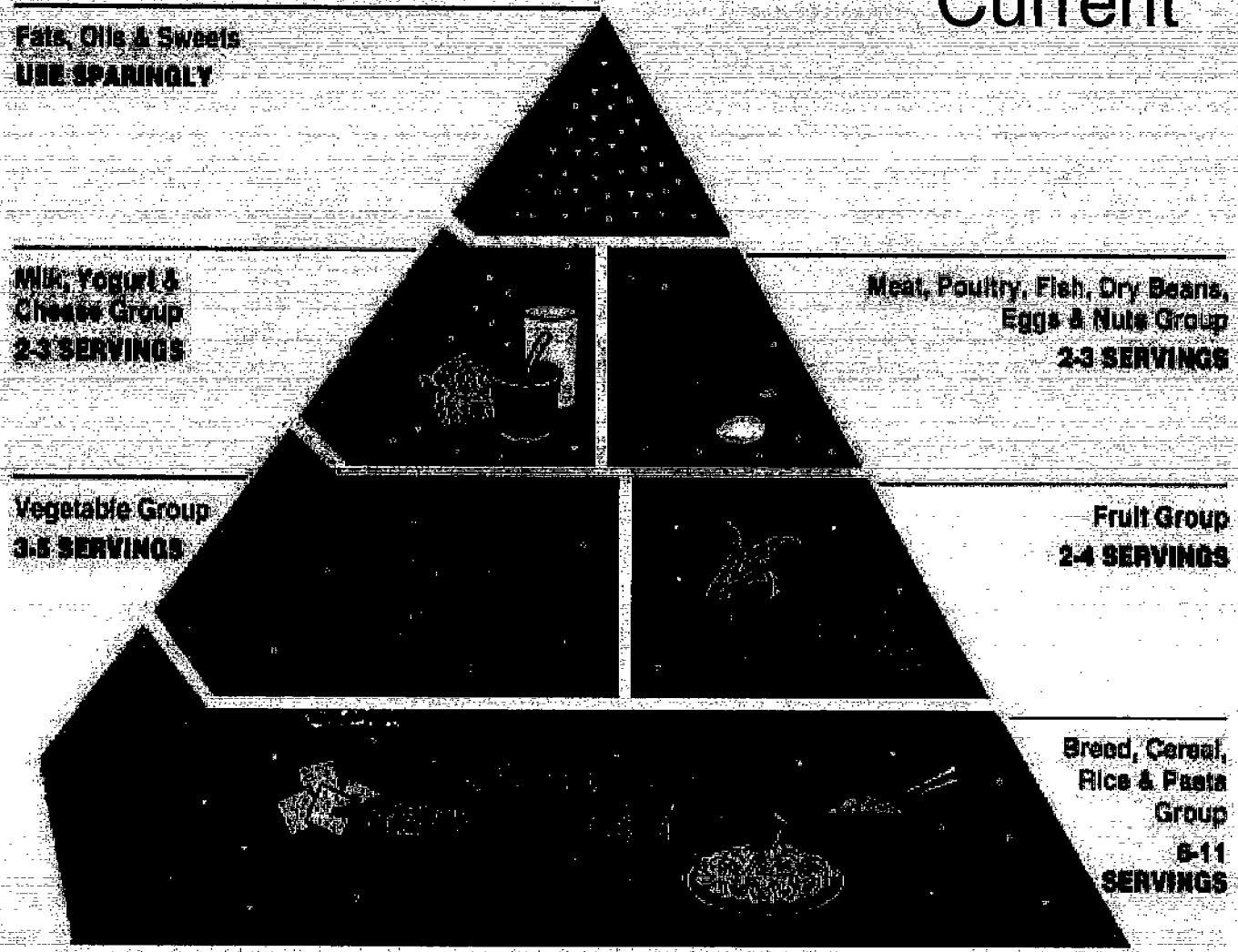
Current



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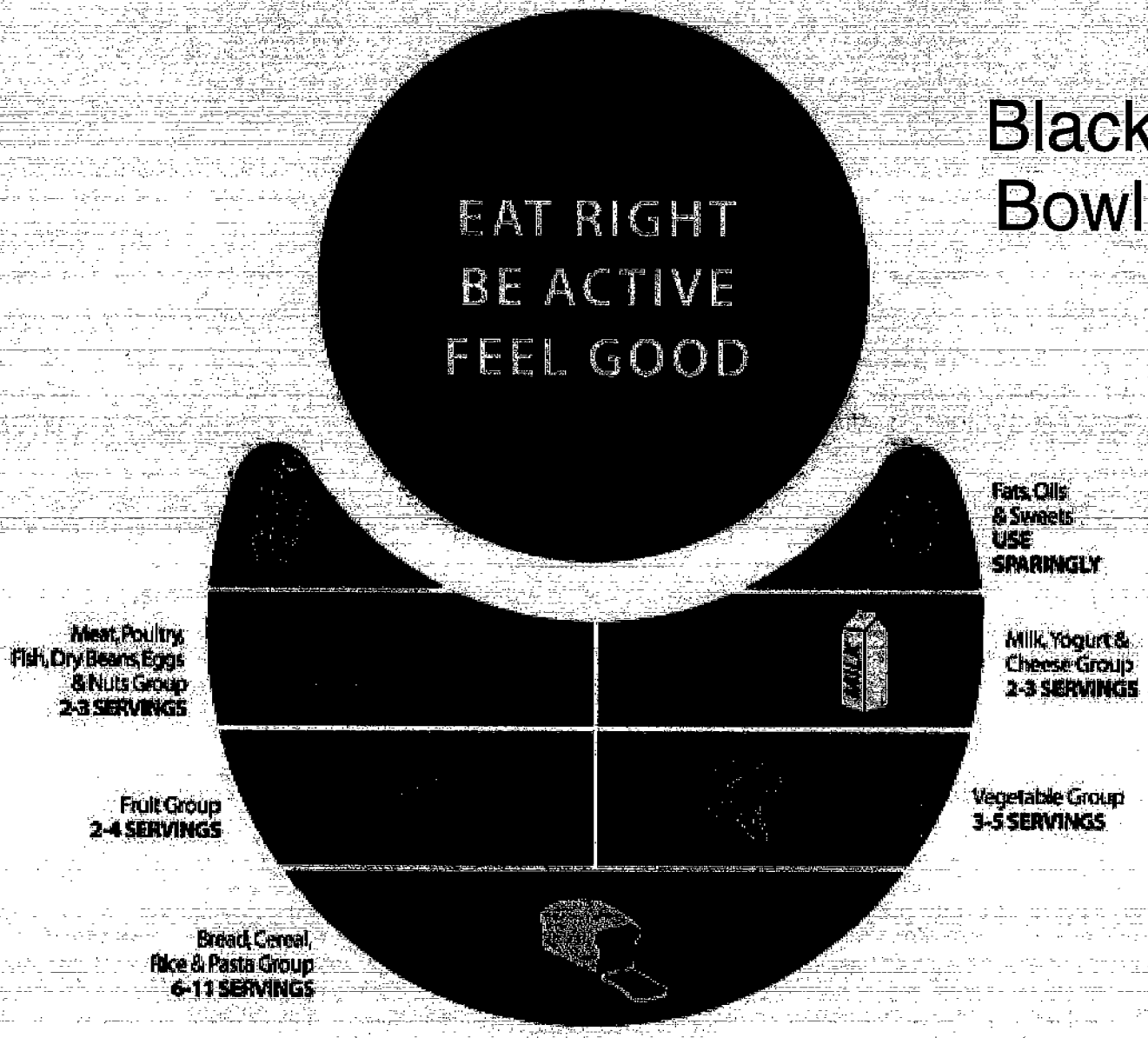
Black Bowl



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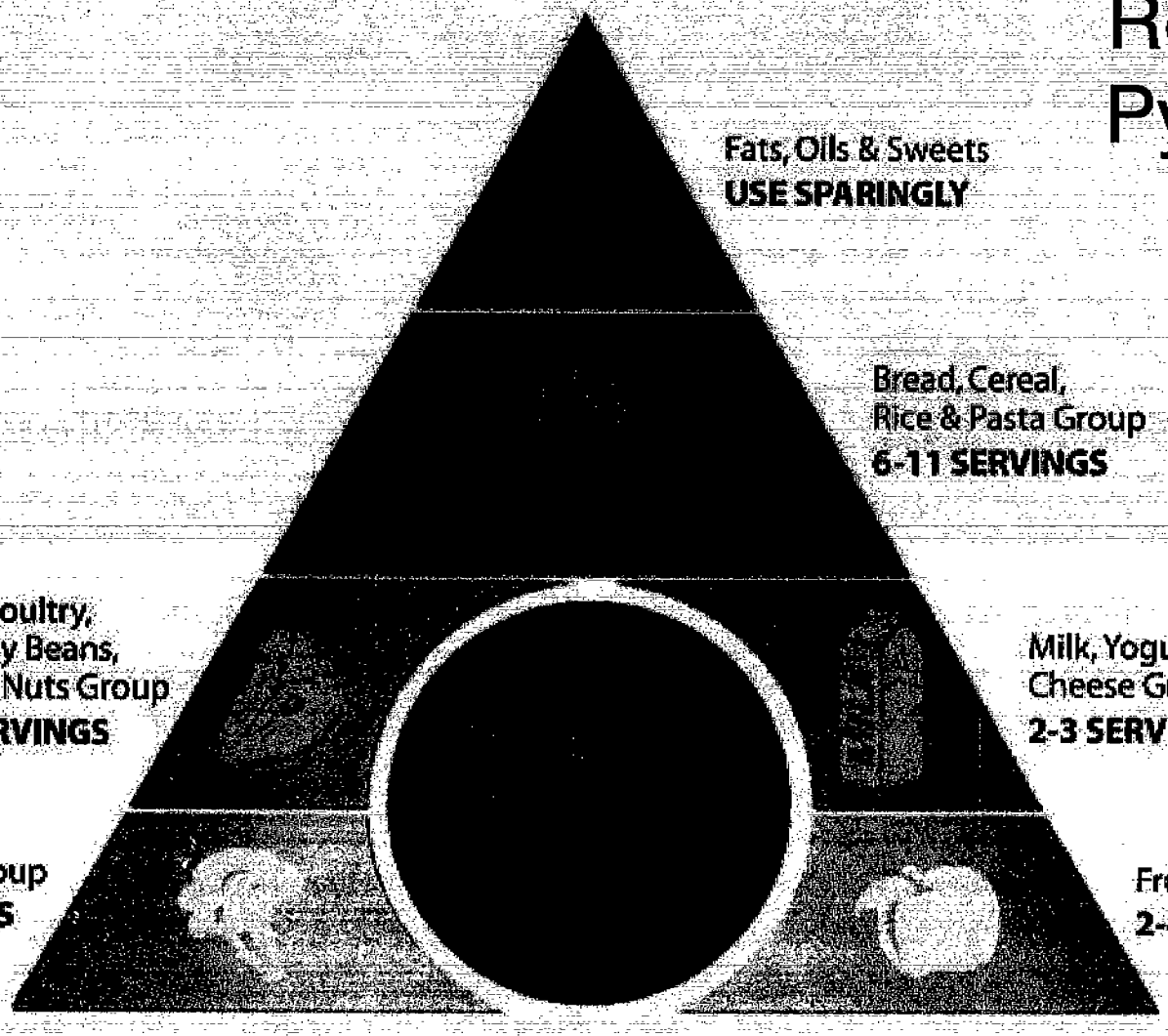
Revised Pyramid



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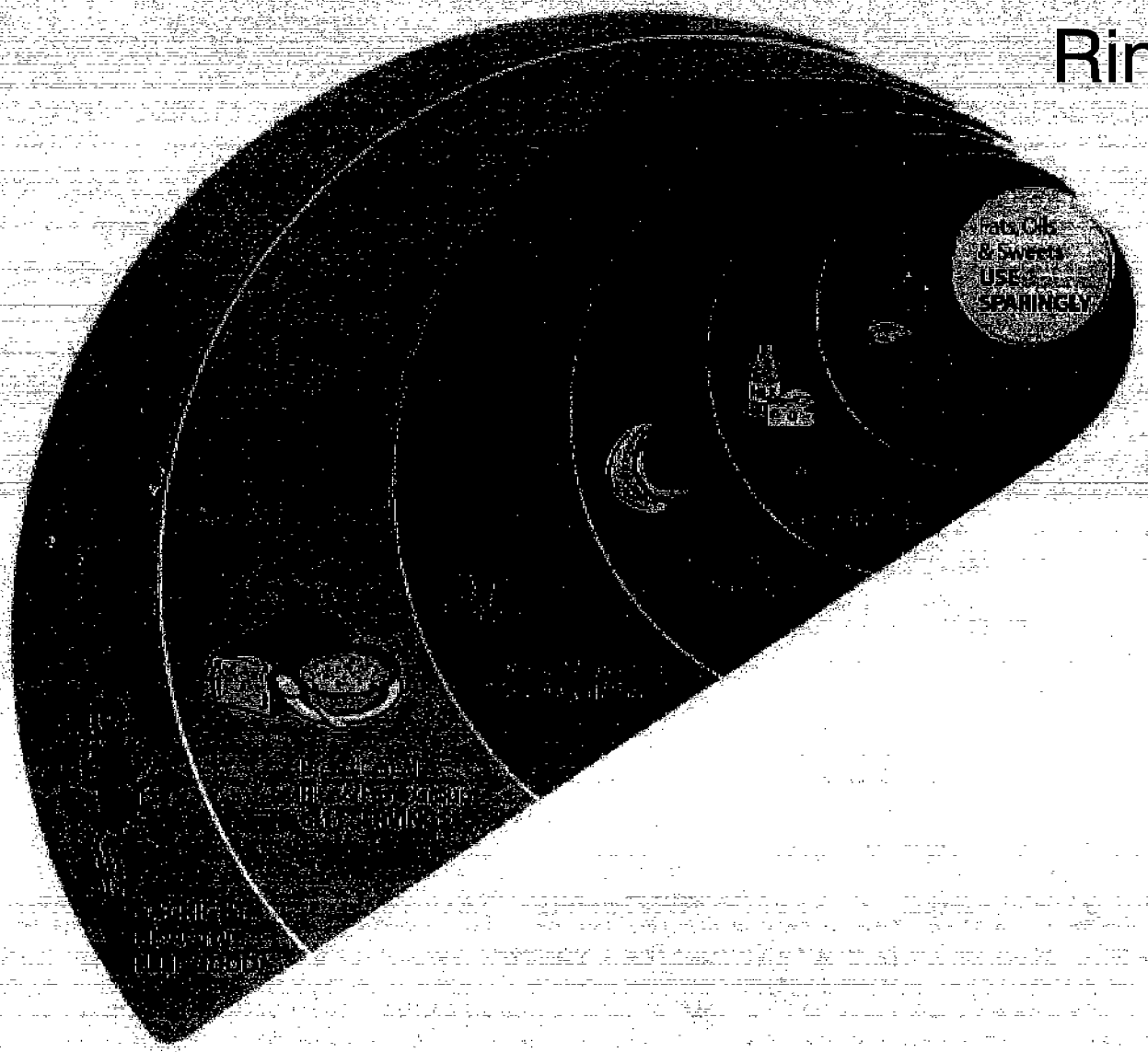
Rings



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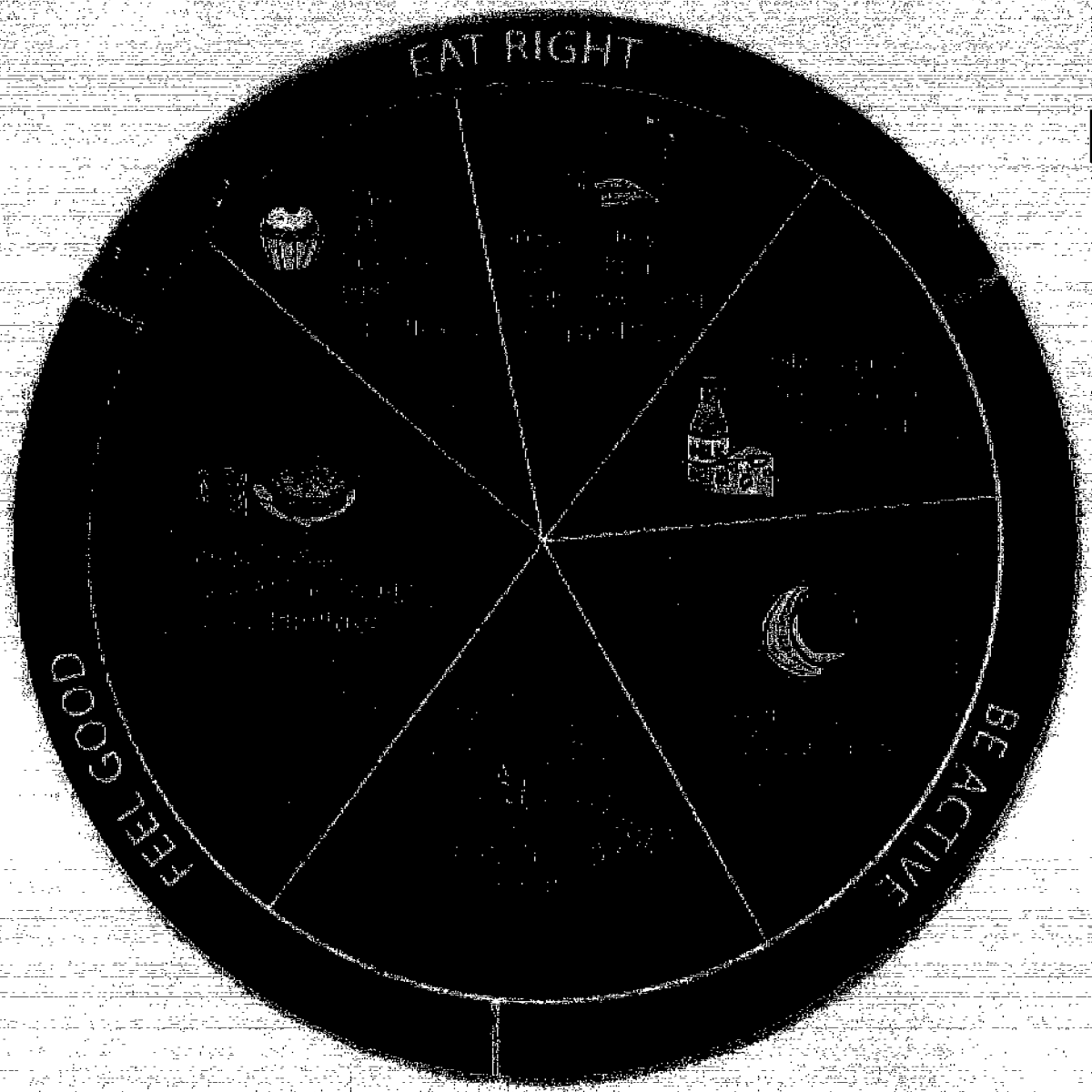
Pie



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III. Management Summary

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Management Summary:

Consumers expressed preference for two designs over the current Pyramid Guide. Two elements stand out as contributing to preference and better communication than the current Pyramid.

1. A more circular shape

Overall, consumers preferred a more circular graphic to the current Pyramid approach, as both "Rings" and "Pie" are significantly preferred with respect to all five preference measures over Current.

- Easier to understand
- More visually appealing
- Best explains what a healthy diet should include
- Has more impact on guiding food decisions
- Is more motivating to change your behavior
  - Rings significantly outperforms Pie on this one measure
- These are also the designs with the highest liking scores, and generally score as well or better than current on the 9 attributes.

2. The figure of the runner reinforces the notion of physical activity

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IV. Preference Measures

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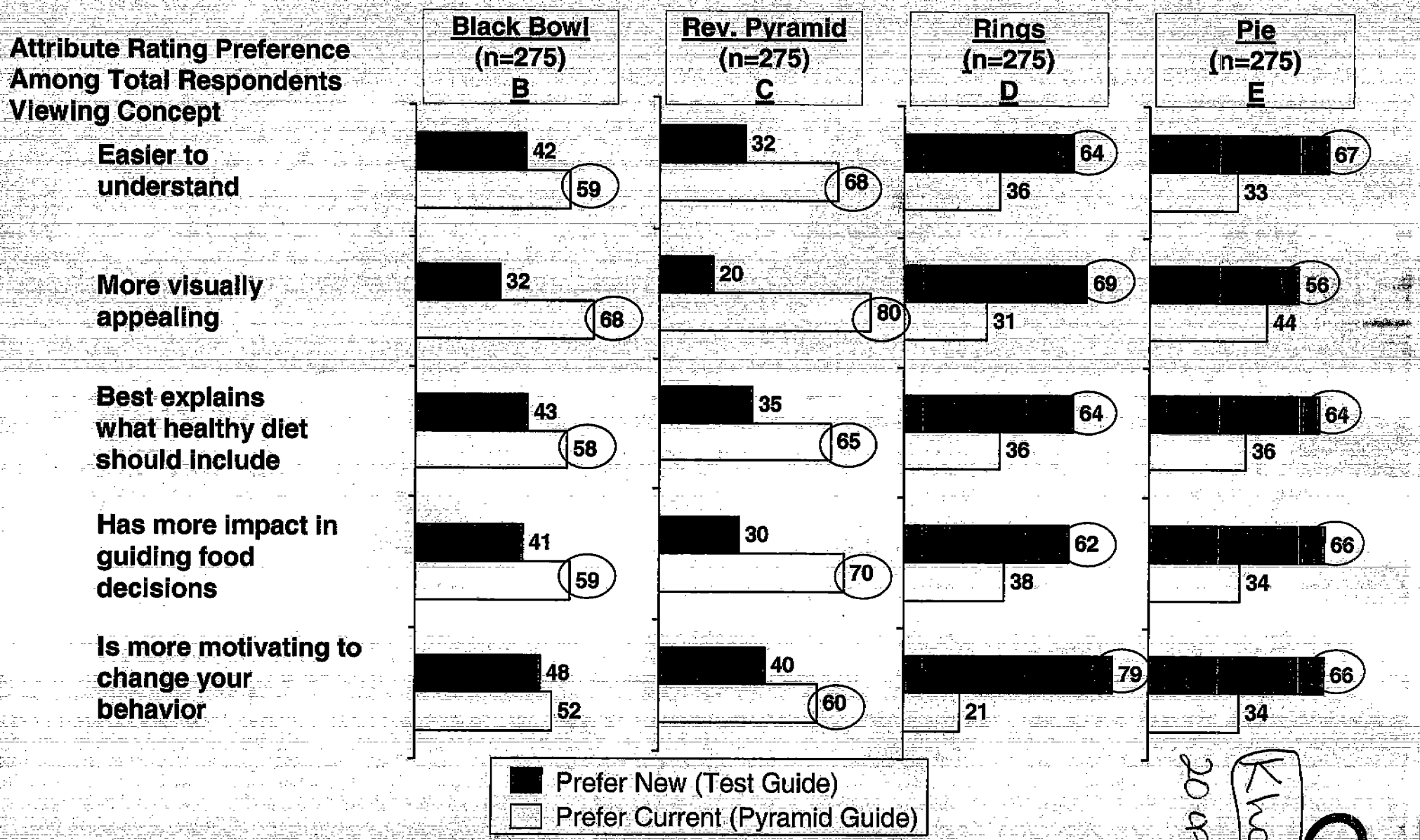
'Rings' and 'Pie' are significantly preferred over Current Food Guide Pyramid on all key attributes



Q.7 You will now be shown another design of a Food Guide, along with the one you have already seen. Choose the Food Guide design that is best described by each of the statements below.

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(Balanced Lifestyle Guide Project.ppt)

V. Monadic Evaluations

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21 Apr 30

With exception of 'Black Bowl', Consumers expressed significantly higher levels of liking for the alternate designs over Current Pyramid

Overall Liking	Black Bowl	Revised Pyramid	Rings	Pie	Total Current
Base: Total Respondents	(200)	(200)	(200)	(200)	(300)
	%	%	%	%	%
	A	B	C	D	E
Like Extremely/Very Well	**29**	**38^{AE}**	**42^{AE}**	**40^{AE}**	**30**
Like Extremely Well	6	7	7	9	6
Like Very Well	23	31^{AE}	35^{AE}	31^{AE}	24
Neither Like Nor Dislike	61^{C}	55	52	56	56
Dislike Very/Extremely Much	**10^{D}**	**7^{d}**	**7^{d}**	**3**	**14^{BCD}**
Dislike Very Much	8^{D}	5^{d}	6^{d}	2	13^{aBCD}
Dislike Extremely Much	2	2	1	1	1
Mean	3.2	3.4 AE	3.4 AE	3.5 AE	3.2
Standard Deviation	.75	.76	.74	.72	.78
Standard Error	.05	.05	.05	.05	.04

Among equal representation of Test and Current (n=200)

Q.3 Which one phrase below best describes how much you like or dislike the look of THIS Food Guide shown?

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'Pie' and 'Rings' are comparable or better than other design, but Rings wins on communicating the value of physical activity.

The fact that the circle shapes score comparably or better than the Current Pyramid, an already well established graphic with 80% recognition, serves as further testament to the strength of the alternative graphic designs.

Attribute Ratings – Top Box Summary
Among Viewers of each design

	Black Bowl A	Rev Pyramid B	Rings C	Pie D	Current E
A guide to help you improve your food choices	29	35[a]	36[a]	38[A]	38[A]
Easy for kids to understand	33[B]	20	30[B]	34[B]	29[B]
Gives good direction on how to put together a well balanced diet	26	30	37[A]	40[AB]	35[A]
Suggests that you monitor your caloric intake	12[b]	8	16[Bd]	10	12[b]
Suggests that physical activity is important	22[E]	19[E]	49[ABDE]	24[E]	13
Tells you how much to eat of each food group in comparison to other foods in diet	35	33	44[aB]	41[b]	43[aB]
Encourages physical activity in comb with balanced diet	19[E]	17[e]	45[ABDE]	19[E]	12
Shows the importance of including a variety of foods everyday	39	42	52[AB]	45	50[Ab]
Shows that all foods fit into a healthy diet	31	27	41[ABE]	38[aB]	33

Among equal representation of Test and Current (n=200)

Q.6 Below are a number of characteristics, which may or may not describe the graphic you are viewing. Please indicate how much you agree or disagree that each characteristic describes the graphic.

(Balanced Lifestyle Guide Project.ppt)

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	Black Bowl A	Revised Pyramid B	Rings C	Pie D	Current E
Is a guide to help you improve your food choices	28.7	35.2a	35.7a	38.1A	37.6A
Mean	3.8	4.1A	4.0a	4.1Ae	4.0a
Standard Deviation	1.04	0.92	1	0.92	1.07
Standard Error	0.07	0.06	0.07	0.06	0.06
Would be easy for kids to understand	32.5B	19.9	29.6B	34.0B	28.7B
Mean	3.8	3.7	3.9B	4.0ABE	3.8
Standard Deviation	1.19	1	1.05	0.93	1.1
Standard Error	0.08	0.07	0.07	0.07	0.06
Would give good direction on how to put together a well balanced diet	26.2	30.2	36.5A	39.7AB	35.3A
Mean	3.7	3.9	3.9a	4.0ABE	3.8
Standard Deviation	1.06	1.08	1.13	1.05	1.17
Standard Error	0.07	0.08	0.08	0.07	0.07
Would suggest that you monitor your caloric intake	12.2b	7.8	15.7B d	10.3	11.8b
Mean	2.9E	2.9e	3.0E	3.0E	2.7
Standard Deviation	1.21	1.21	1.35	1.22	1.33
Standard Error	0.09	0.09	0.09	0.09	0.08
Would suggest that physical activity is important	21.7E	19.4E	49.0ABDE	24.2E	12.9
Mean	3.2E	3.2E	4.3ABDE	3.4bE	2.2
Standard Deviation	1.31	1.39	0.85	1.31	1.43
Standard Error	0.09	0.1	0.06	0.09	0.08

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	Black Bowl A	Revised Pyramid B	Rings C	Pie D	Current E
Would tell you how much to eat of each food group in comparison to other foods	35.4	33.4	44.0aB	41.2b	43.0aB
Mean	4	4	4.1ab	4.1a	4.1
Standard Deviation	0.99	0.96	1.01	0.95	1.06
Standard Error	0.07	0.07	0.07	0.07	0.06
Would encourage physical activity in combination with a balanced diet	19.2E	16.6e	44.9ABDE	19.2E	11.5
Mean	3.2E	3.2E	4.2ABDE	3.3E	2.2
Standard Deviation	1.28	1.36	0.89	1.26	1.38
Standard Error	0.09	0.1	0.06	0.09	0.08
Would show the importance of including a variety of foods everyday	38.9	41.6	51.8AB	45	49.5Ab
Mean	4.1	4.2	4.4ABDE	4.3A	4.3A
Standard Deviation	0.94	0.86	0.75	0.84	0.92
Standard Error	0.07	0.06	0.05	0.06	0.05
Would show that all foods, in moderation, fit into a healthy diet	30.6	27.4	40.9ABE	38.2aB	32.7
Mean	3.9e	3.9e	4.2ABE	4.1aE	3.8
Standard Deviation	0.96	0.94	0.89	0.96	1.16
Standard Error	0.07	0.07	0.06	0.07	0.07

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VI. Appendix

Awareness of Food Guide

Base: Total Respondents	Total	GENDER: Males	GENDER: Females	PRESENCE OF KIDS: With Kids	PRESENCE OF KIDS: Without Kids
	% A	% B	% C	% D	% E
Black Bowl	(200) 34	(45)* 34	(155) 34	(137) 36	(63) 31
Revised Pyramid	(200) 60	(44)* 53	(156) 62	(133) 64[e]	(67) 52
Rings	(200) 31	(42)* 34	(158) 30	(134) 27	(66) 38[d]
Pie	(200) 41	(44)* 39	(156) 42	(128) 40	(72) 43
Current Pyramid	(300) 79	(63) 66	(237) 82	(193) 78	(107) 80

* Caution small base

Q.2 Have you ever seen THIS Food Guide before?

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Where Have Seen Food Guide

	Total	GENDER: Males	GENDER: Females	PRESENCE OF KIDS: With Kids	PRESENCE OF KIDS: Without Kids
Base: Total Respondents	(1,100)	(239)	(861)	(726)	(374)
	%	%	%	%	%
	A	B	C	D	E
From nutrition education	26	23	27	27	25
Food magazines	23	15	25[B]	24	20
Through school/in my child's school	20	14	22[B]	23[E]	13
Fitness magazines	18	16	19	17	20
On packages of food	15	12	16[b]	14	17
Television programs	14	13	15	15	14
Diet books	13	10	14[B]	13	15
Cookbooks	12	9	13[b]	12	11
Internet informational websites	11	12	11	10	12
Through food assistance program	9	5	11[B]	12[E]	5
Newspapers	6	5	6	5	7[d]
On beverages	1	2[C]	1	1	2[d]
Other	5	5	5	5	5

Q.2 Where have you seen THIS Food Guide before?
Lower case letter – significantly higher than column indicated at the 80% level of confidence
Capital letter – significantly higher than column indicated at the 90% level of confidence

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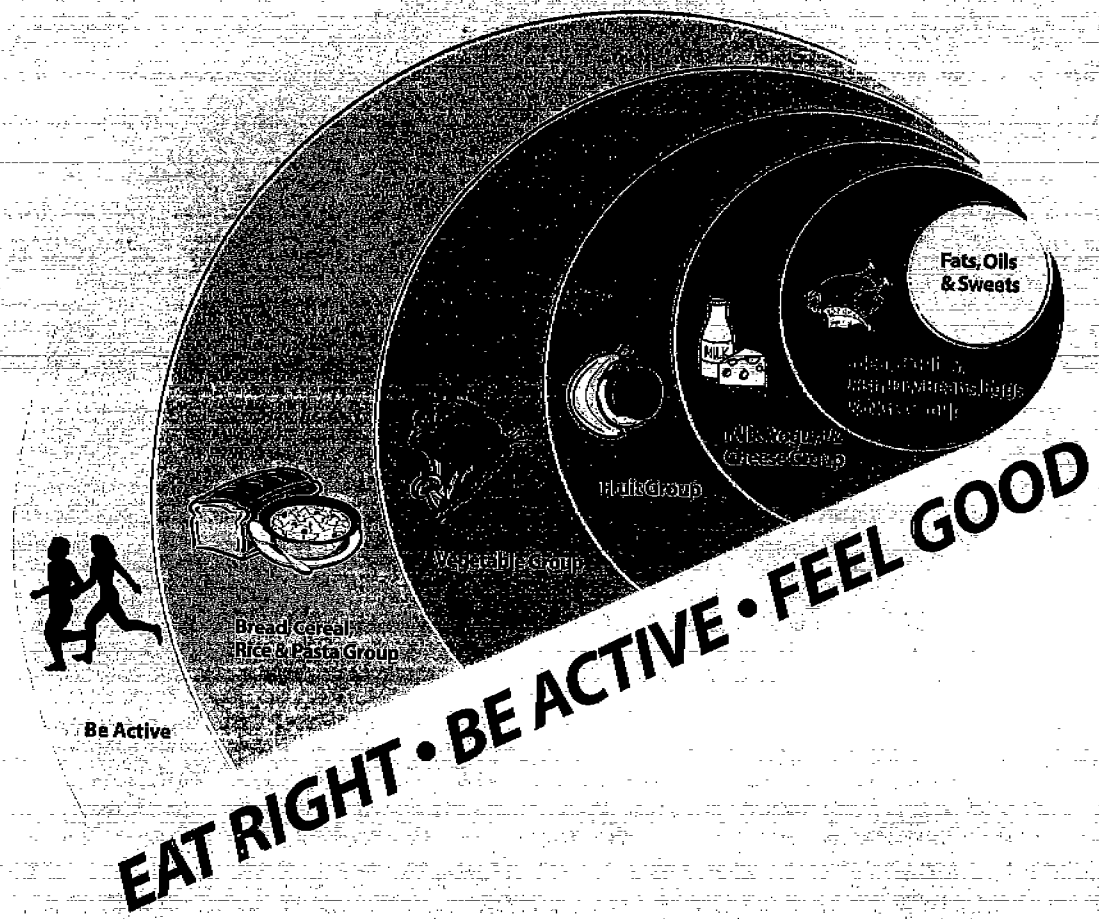
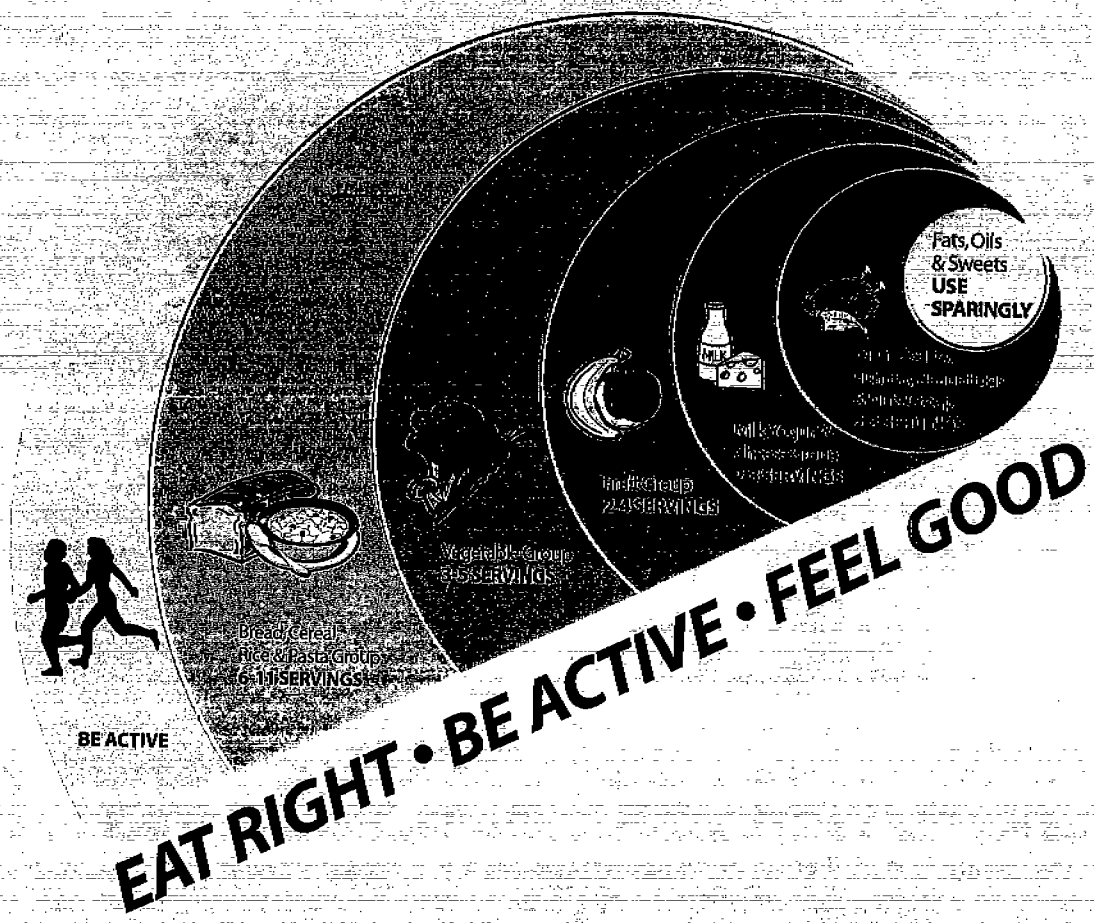
ATTACHMENT B-1



ATTACHMENT B-2

B-2



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THE SUGAR ASSOCIATION

AUG 27 2004

August 27, 2004

Original copy sent via courier.

Briscoe 1 of 2

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

RE: Comments/Suggested Revisions to the Food Guide Pyramid

Dear Dr. Hentges:

While the Sugar Association has already submitted a set of formal comments, I would like to share a couple of quick suggestions for the Center for Nutrition Policy and Promotion to consider in its effort to create a science-based, consumer-friendly tool to communicate and reflect the updated Dietary Guidelines to all Americans in their battle to maintain a healthy lifestyle. Attached is a graphic which includes the suggested revisions outlined below.

1) I would recommend changing the title from "Food Guide Pyramid" to "Lifestyle Pyramid." This name change reiterates the importance of energy in versus energy out in the pursuit of a long, productive and active life.

2) I would recommend the actual graphic reflect what the science clearly supports that physical activity is half the equation in maintaining a healthy lifestyle. Visually reinforcing the importance of physical activity as part of a "Lifestyle Pyramid" will help provide consumers and children alike the need to include 30-60 minutes of activity in their daily schedules.

These recommendations would improve on the existing success that the Food Guide Pyramid has achieved in consumer recognition. It would be science-based. And it would truly reinforce the critical importance of physical activity in our daily lives.

Thank you and CNPP for opening up the process to allow for shareholder input and participation in updating and making the Pyramid a better tool to help consumers with nutritional decisions and educating them on healthy lifestyle choices .

Sincerely,

Andrew Briscoe III

Andrew C. Briscoe III
President & CEO
The Sugar Association

Briscoe 2 of 2

Lifestyle Pyramid

KEY
- ☐ Fat (naturally occuring and added)
- ☑ Caloric Sweetener (natural and formulated)

Physical activity is essential for maintaining weight and a useful component of weight control.

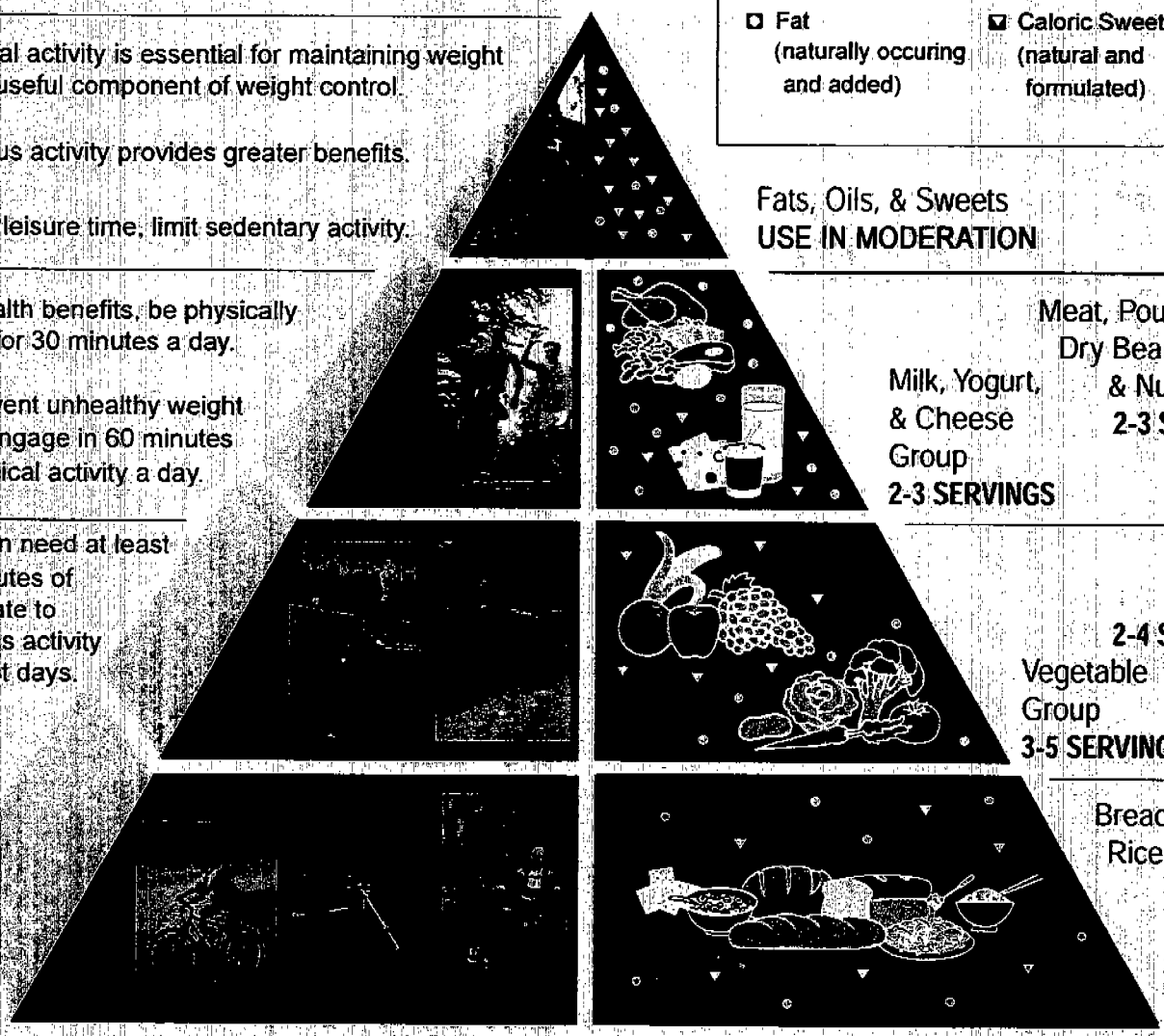
Vigorous activity provides greater benefits.

During leisure time, limit sedentary activity.

For health benefits, be physically active for 30 minutes a day.

To prevent unhealthy weight gain, engage in 60 minutes of physical activity a day.

Children need at least 60 minutes of moderate to vigorous activity on most days.



Fats, Oils, & Sweets
USE IN MODERATION

Meat, Poultry, Fish, Dry Beans, Eggs, & Nuts Group
2-3 SERVINGS

Milk, Yogurt, & Cheese Group
2-3 SERVINGS

Fruit Group
2-4 SERVINGS

Vegetable Group
3-5 SERVINGS

Bread, Cereal, Rice, & Pasta Group
6-11 SERVINGS

Source: U.S. Department of Agriculture/U.S. Department of Health and Human Services

A healthy lifestyle involves energy in vs. energy out. To achieve this goal, a variety of foods should be consumed in moderation and physical activity must be part of a daily schedule.

Wegmans

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August 26, 2004

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

RE: **Comments on Proposed Changes to USDA Food Guide Pyramid**

Wegmans Food Markets was the first food company in the nation to use the Food Guide Pyramid on food packaging. We have also used the Food Guide Pyramid as the basis for our "Good Food Tours" for 4th graders involving over 126,000 students since 1992. Based on our experience, we recommend that the revised Food Guide Pyramid maintain the current shape.

We understand that the Dietary Guidelines Advisory Committee will recommend that consumers eat at least **5 to 13** servings of fruits and vegetable a day, depending on their calorie needs. There is no debate about the health benefits associated with fruits and vegetables and we strongly support the recommendation for increasing consumption to at least **5 to 13** servings. At the same time, we believe that many consumers do not know how to apply the dietary guidelines to their specific needs and encourage the development of specific guidance for specific calorie needs.

Wegmans has experience educating consumers and employees to the need to "Strive for Five" servings of fruits and vegetables a day. We have been impressed by the enthusiasm of over 2,000 employees who counted fruit and vegetable servings as part of our "Eat Well, Live Well" 2004 challenge. Yet many of our employees didn't know what counts as a serving. We encourage USDA to do much more to educate consumers on what constitutes a serving.

Lastly, given the increased emphasis on fruits and vegetables, any changes to the Food Guide Pyramid must reflect this and feature fruits and vegetables more prominently in the graphic.

Thank you for the opportunity to offer these comments.

Sincerely,

David Corsi

David Corsi
V.P Produce Merchandising
Wegmans Food Markets

Dow AgroSciences LLC

Washington, DC

rec'd 8/27/04 DH

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August 27, 2004

Dow AgroSciences

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

Dear Food Guide Pyramid Reassessment Team:

Based on substantial scientific evidence, Americans need to reduce both saturated and trans fat simultaneously in their diets. Further, research shows that substituting non-hydrogenated unsaturated fats for saturated and trans fats in the diet can reduce coronary heart disease risk (1,2).

Proposed Core Messages
We support Food Guidance System proposed core messages intended to "lower chronic disease risk by lowering intake of saturated fats, trans fats, cholesterol, [etc.]." Moreover, a substitution message that advises consumers to use unsaturated fats in place of trans and saturated fats would be more instructive.

For example, the most recent American Heart Association Dietary Guidelines 2000 advise consumers to, "Limit foods high in saturated fat and cholesterol; and substitute unsaturated fat."

Food Guide Pyramid Graphic
The Food Guide Pyramid graphic should make clear that non-hydrogenated, unsaturated oils are essential to the diet and that they should be consumed in small amounts throughout the day. Currently, all fats and oils are lumped together at the top of the pyramid in the "use sparingly" section, whereas healthful unsaturated oils should appear near the bottom of the pyramid, or if another graphic is used, they should appear in the "consume regularly" section. A weight-loss study conducted at Harvard School of Public Health showed that dieters actually lost more weight, kept it off, and consumed an extra two servings of vegetables a day when they could use healthy oils for dressings, stir fries, etc. (3)

Reduction of Trans and Saturated Fats in Food Supply—Natreon™ Canola Oil
Natreon is a new, improved canola variety that is naturally stable and can decrease trans and saturated fats in the food supply today. Like traditional canola oil, Natreon contains about 7 percent saturated fat, the lowest of any vegetable oil. Natreon has over 70 percent monounsaturated fat for stability and has a higher 18:3 content than most of the partially hydrogenated oils it can replace. The finished product contains less than 1 percent trans, which is acquired during processing.

Natreon is competitively priced to most non-hydrogenated oil alternatives and has equal or superior functional applications for food service and food manufacturing.

Thank you for your consideration.

Sincerely,

Bradley A. Shurdut
Global Director, Public & Government Affairs, Biotechnology
Dow AgroSciences

Shurdut 2 of 2

References:

1. Ascherio A, Willett, WC. Trans fatty acids and coronary heart disease. *New England Journal of Medicine*. 1999;340:1994-8.
2. Hu FB, Willett WC. Optimal diets for the prevention of coronary heart disease. *Journal of the American Medical Association*. 2002; 288(20): 2569-2578.
3. McManus K, Antinoro L, Sacks F. A randomized controlled trial of a moderate-fat, low-energy diet compared with a low-fat, low-energy diet for weight loss in overweight adults. *International Journal of Obesity*. 2001;25:1503-1511.

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STATE OF FLORIDA
DEPARTMENT OF CITRUS
LAKELAND, FLORIDA

100% PURE FLORIDA

DAN L. GUNTER
EXECUTIVE DIRECTOR
Phone:
Fax:

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ANDREW R. TAYLOR
CHAIRMAN
FLORIDA CITRUS COMMISSION

August 24, 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:

The Florida Department of Citrus (FDOC) is a governmental state agency responsible for advertising, marketing, regulating and promoting Florida citrus products throughout the world, as well as conducting and promulgating research on behalf of Florida citrus growers and the citrus industry.

The Florida Department of Citrus endorses the Food Guide Pyramid Reassessment Team's goal of (1) increasing consumer awareness of the new science-based nutrition guidance, (2) encouraging consumers to make positive changes in their food choices, and (3) educating consumers about food choices and amounts to consume. The FDOC strongly supports the new food guidance system and believes that the accompanying materials should continue to emphasize that only 100% fruit juices should be considered a fruit serving. We also concur that core messages promoting nutrient-dense food choices as a means to increase the intake of vitamins, minerals, fiber and other key nutrients must remain central to the goal. The FDOC applauds the Administration's aggressive approach to devise recommendations that continue to emphasize choosing carbohydrates that "maximize nutrient value per calorie" and differentiating between the preferability of fruit and fruit juices without added sugars. Studies conducted by the Center for Science in the Public Interest show that orange juice and grapefruit juice rank number 1 and number 2, respectively, as being the most nutritionally dense juices an individual can drink. An 8-oz. glass of orange juice is fat free, cholesterol free, sodium free, provides over 100% of recommended daily vitamin C, is a good source of folate, potassium, and thiamin and also provides magnesium, riboflavin, and niacin. An 8-oz. glass of grapefruit juice is fat free, cholesterol free, sodium free, an excellent source of vitamin C, and provides folate, potassium, thiamin, and magnesium.

Numerous studies have been conducted on the nutrients found in citrus fruit, including orange juice, and the role these nutrients may play in reducing the risk of such diseases as cancer, heart disease, birth defects and stroke when part of a low-fat diet rich in fruits and vegetables. And, there is also a growing body of medical research that supports the health benefits of antioxidants such as vitamin C, as well as folate, dietary fiber (including soluble fiber), and other vitamins and minerals found in Florida citrus.

Gunter 2 of 2

We also know that orange juice is synonymous with breakfast. Studies consistently show that breakfast eaters demonstrate increased performance in work and school, maintain a better nutritional profile and fight illness, among other health benefits. Simply put, kids who eat breakfast perform better in school. They're also less likely to be anxious, depressed, or irritable, according to the American Dietetic Association. Recent studies show individuals who eat a healthy breakfast are less likely to be obese than individuals who skip breakfast.

Consumer understanding of the revised Pyramid graphic is essential. In the fruits category graphics, we recommend the guidance system include a statement of "100% fruit juice" or a visual of a glass of 100% fruit juice. Since orange juice is the most nutrient dense 100% fruit juice, we advocate including a glass of orange juice in the new Food Guidance System, but regardless, feel that consumers need a point of reference to understand that one serving of 100% fruit juice = 1 fruit serving. The current Food Guide Pyramid graphic does not clearly illustrate this point.

Studies show consumers want to eat more healthfully. We propose that the educational and motivational components provide more comprehensive information in identifying specific fruit juices and foods that are nutritionally dense, and based on studies and sound science, list the potential health benefits that one might derive from daily consumption.

Again, we commend the Reassessment Team's efforts in providing information to consumers that reflects sound science and promotes a healthy lifestyle. The Florida Department of Citrus looks forward to working with you as you finalize the food guidance system for Americans. Additionally, we look forward to using the new Food Guide Pyramid language and graphics, whenever possible, throughout our marketing efforts, including public relations, Internet, advertising and promotions.

Sincerely,

Dan L. Gunter

Dan L. Gunter
Executive Director

CALIFORNIA Walnuts

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AUG 27 2004

August 26, 2004

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

Dear Committee Members:

On behalf of the California Walnut Commission, I am pleased to provide comments to the USDA Center for Nutrition Policy and Promotion and the Food Pyramid Reassessment Team. As mentioned in the Federal Register, Vol. 69, No. 133, dated July 13, 2004, we would like to offer comment on the areas requested.

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

Consumers are already familiar with the food pyramid graphic. We feel the most important aspect to address is updating the content of the graphic to reflect a more balanced diet rich in whole foods, such as walnuts, that provide essential nutrients. As a registered dietitian, I feel the credibility that has been built around the Food Pyramid graphic would most likely suffer if a new graphic was introduced.

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

Messages must be consistent and clear. Since the pyramid is used as a guide for school food service and federal nutrition programs, whole unprocessed foods that are readily available should be positively reflected. In addition, a variety of food sources must be shared for specific nutrients. For example, for consumers to receive adequate amounts of alpha linolenic acid (ALA) as recommended by the National Academy of Sciences DRI report of September 2002 suggesting walnuts, in addition to marine sources and canola based soft margarines, as a rich source provides an important variety of choices for consumers who may otherwise not get this important nutrient.

California Walnut Commission

Sacramento, California • **Telephone** **FAX**

E-mail: • **Web Site: www.walnuts.org**

Sloan 2 of 2

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

Consumers are different; therefore, individual guidance is key. Proper nutrition education materials prepared for health professionals and nutrition educators who are the gatekeepers of consumer messaging will be vital.

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

A graphic is crucial for simple messaging, and more specifics are needed for those consumers who want more information, as well as for the health professional and educators who convey these messages.

E. Key components for effective interactive educational tools.

Messages once again must be consistent and not misleading. A variety of foods must be emphasized for all nutrients that are not based on food consumption patterns of the past. Emphasis on what we should be eating is necessary, not on what we have been eating.

The science has shown what constitutes a healthy diet, i.e., whole grains, fruits and vegetables, nuts such as walnuts for alpha linolenic acid, lean protein, and calcium sources, as well as proper hydration and daily exercise.

F. Channels of delivery for the Food Guidance system.

Consistent use of the Food Guide Pyramid and US Dietary Guidelines by food companies, nutrition education programs, and school food service will be helpful in getting the message across to all consumers. Hopefully, there can be harmony and not dissension among corporations and governmental offices.

The California Walnut Commission appreciates the opportunity to provide comment to the USDA in regard to the Food Guide Pyramid revisions. Thank you for your consideration.

Sincerely,

Carol Berg Sloan RD.

Carol Berg Sloan, RD
Consultant
California Walnut Commission

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August 26, 2004

American Cancer Society

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

Doyle 1 of 1

Dear Colleagues:

On behalf of the American Cancer Society, I would like to thank you for the opportunity to respond to proposed changes in the Food Guide Pyramid. The Society, like the United States Department of Agriculture (USDA), is committed to improving the nutrition and physical activity of all Americans because of the proven health benefits and the corresponding reduction in cancer risk.

The Food Guide Pyramid is a key communication tool used to educate consumer and influence behavior and we appreciate the opportunity to provide input into the review process. While we support the ongoing use of the pyramid shape to guide consumers in making healthy food choices, we do feel the following issues need to be addressed:

- The Pyramid must convey the concept of weight control and physical activity as important components of a healthy lifestyle, in addition to food choices. To this end, consideration should be given so that the name of this newly-revised tool reflects these additional components.

- Within each food group, emphasis must be placed on nutrient quality, and icons should be used to depict those healthier choices. Whole grains need to be distinguished from and emphasized over refined or processed grains; whole vegetables and fruits should be emphasized over juice; starchy vegetables should be included within the grains group; lean protein sources should be emphasized over those higher in saturated fat; sources of plant oils and "healthy fats" should be emphasized over other fat sources.

- The Pyramid should continue to reflect foods and nutrients to be consumed infrequently, including saturated fat, added sugars and refined grains.

We look forward to continuing our collaborative efforts to achieve our mutual goals of improving the public's health.

Sincerely,

Colleen Doyle, MS, RD
Director, Nutrition and Physical Activity

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NATIONAL DAIRY COUNCIL® 290

MANAGED BY
DAIRY MANAGEMENT INC™

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August 26, 2004

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

FR Docket No. 04-15710 Center for Nutrition Policy and Promotion; Notice of Proposal for Food Guide Graphic Presentation and Consumer Education Materials; Opportunity for Public Comment

Dear Sir or Madam:

The NATIONAL DAIRY COUNCIL® (NDC) submits the following comments on the docket referenced above.

The NDC is an organization that initiates and administers nutrition research, develops nutrition programs, and provides information on nutrition to health professionals and others concerned about good nutrition. The NDC has been a leader in nutrition research and education since 1915. Through its affiliated Dairy Council units, the NDC is recognized throughout the nation as a leader in nutrition research and education.

We commend the USDA and HHS for employing a science-based approach to develop nutrition guidance that will meet the current and future health and nutrition needs of Americans.

We appreciate the opportunity to provide comments on the proposal for Food Guide Graphic Presentation and Consumer Education Materials. To better understand consumer perspectives on food guidance the NDC conducted a study among 1,000 consumers from July 29 – August 5, 2004. The results are incorporated into these comments.

Miller 2 of 5

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

Research demonstrates the **Food Guide Pyramid with the five food groups is the most appropriate symbol for national nutrition guidance and education [1].** The Dietary Guidelines Advisory Committee recently concluded that individuals should choose from within and among the five food groups [2].

New consumer research shows most Americans (60 percent) are extremely, very or somewhat familiar with the Food Guide Pyramid, yet most (60 percent in the survey said "not at all") do not use it to influence their daily food intake [1].

There are advantages to building on consumer familiarity with the pyramid shape. Introducing a new shape might cause more confusion among consumers, further delaying the adoption of positive eating behaviors that are urgently needed to address the needs of overweight but undernourished Americans who may also have other health problems [3]. Extensive consumer research prior to the release of the Food Guide Pyramid determined it was the best graphic to convey proportionality, variety, and moderation [4]. Based on consumption data, these continue to be important concepts for people to understand.

When used alone (as it is on food packages and educational materials), the proposed new graphic, envisioned as a simplified symbol or "brand" to represent the system but not provide detailed information, may not help consumers make healthy food choices. **There are advantages to retaining the pyramid shape and the five food groups within it.** As stated above, the shape has equity among most Americans, and while most don't use the Food Guide Pyramid to influence their daily food intake, there are advantages to building on the group of Americans who do (39 percent said often or occasionally) [1]. The five food groups provide a simple guide for Americans to follow, based on usual food patterns, so they get the nutrients they need each day for good health and nutrition. A new symbol without the basic guidance of food groups may further confuse rather than help Americans.

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

Consumers need reinforcement at multiple touch points throughout the course of the day to help them choose foods among the five food groups and achieve energy balance.

American consumers may not be motivated to respond to a simple graphic without context information, even if it is in the recognizable pyramid shape. There will be educational moments with the graphic alone. **By incorporating simple educational messages into the pyramid graphic, such as one target number of servings instead of a range of servings for each food group, it could clearly and immediately communicate core nutrition guidelines for Americans.** This is extremely important, as the symbol may continue to be used without context on food packages and in educational outreach.

[Miller] 3 of 5

Previous NDC comments outlined the benefits of harmonizing the serving sizes of the Food Guide and Nutrition Facts label to reduce consumer confusion [5]. The Nutrition Facts labels of food packages use 2,000 calories as a reference point. New research shows the majority of Americans (57 percent) claim to know exactly or approximately how many calories they should take in per day based on their gender and activity level [1]. Therefore, most Americans would likely relate to a single reference point of 2,000 calories for the symbol, and understand that they should eat more or less of the recommended serving for each food group based on their individual needs.

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

For the minority of Americans who require or want more customized guidance, it will be especially important to motivate and educate them using the individualized tools proposed. The Pyramid symbol or **"brand" could be "co-branded" with customized individual pyramids that may be more relevant to the individual audience. This customized guidance could be individualized to reflect calorie intake levels, age and sex, but also for other key factors that may drive food choices more than health: taste and cultural preferences, convenience and cost. The individualized Pyramids could then share essential food guidance core messages**

When designing individualized guidance, it may be important to consider that consumers today are time-crunched and looking for simple solutions to make their lives easier, including the choices they make about nutrition. The current proposal would require that a consumer take four steps to get specific recommendations. **It will be critical to conduct extensive testing of the proposed package of educational tools – symbol plus slogan plus core messages plus individualized/customized guidance – among representative U.S. households to ensure that consumers will truly implement the four steps, and that it will fit within the time and in the manner in which they currently plan, purchase, and prepare foods.**

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

Core messages could help individuals make appropriate food choices and link together individualized pyramids or educational materials. These simple actionable core or generalized messages could contain enough information -- about food groups and target serving per food group, for instance -- to further help Americans make individual choices. An actionable message such as 3-A-Day of Dairy has been proven to be clear and understandable to consumers [6].

As stated in section B, a symbol with a single serving target number for each food group based on a 2,000 calorie diet represents educational opportunity. When combined with the proposed core messages, it can become an even more powerful public health message:

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- The core message about keeping calorie intake balanced with energy expenditure to prevent weight gain, promote weight loss, and /or maintain a healthy weight is important. As the Dietary Guidelines Advisory Committee recently concluded: **"Consuming three servings per day of milk and milk products can reduce the risk of low bone mass and contribute important amounts of many nutrients. Furthermore, this amount of milk product consumption is not associated with increased body weight. Therefore, the intake of three servings of no and lowfat milk products per day is recommended" [2]. This core message, and others like it, would fulfill one of the original purposes of the Food Guide Pyramid, which is to provide visual representation of the Dietary Guidelines [3].**

  In the case that this core message cannot be included due to time or space limitations, the inclusion of a specific serving recommendation for three servings of dairy in the symbol would accommodate for the missing message.

- The core message about promoting nutrient dense food choices to increase the intake of vitamins, minerals, fiber, and other key nutrients, especially those that are often low in typical diets is important. With an increased focus on making calories count, it's even more important for Americans to maximize their nutrient intake by choosing naturally nutrient rich foods first. Because of its total nutrient package, intake of milk and other dairy foods also improves the overall nutritional density of the diet and is a marker of a high-quality diet [7], particularly in women, older adults, children, and adolescents. **Therefore, a core message stating, "Choose nutrient-rich foods first, such as no and lowfat milk products, whole grains, colorful fruits and vegetables, and lean meats."**

Before implementation, it will be important to conduct consumer research to determine what symbol and messages really motivate, educate, and resonate with consumers.

E. Key components for effective interactive educational tools

The Internet is clearly an important channel for reaching consumers, and it provides the best "home" for individualized food guidance tools. Decisions about the most effective interactive tools may be best made by accessing those companies most experienced in creating the tools, in addition to case studies from successful online health, nutrition and dieting programs. NDC has had success in providing a range of nutrition education materials to health professionals and school educators.

F. Channels of delivery for the Food Guidance System

In addition to using the Internet as one of the key channels for delivering Food Guidance System elements, public-private partnerships like the Dietary Guidelines Alliance provide a great way to reach consumers. We are certain the USDA will successfully meet the challenge of providing reliable nutrition advice through the Food Guidance System. Upon this success, the NDC will work with industry and government groups to carry the

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Food Guidance messages to consumers through health professionals, media, schools, and in-store programs.

For more than 85 years the National Dairy Council has worked to advance the state of scientific knowledge on the role and value of dairy foods in promoting and enhancing human nutrition and health. Thank you for encouraging us to take an active role in the public process. We will continue to assist the USDA in any way possible to achieve results that will benefit the health and well being of all Americans.

Thank you for the opportunity to comment on these important issues.

Sincerely,

Gregory D. Miller, PhD, FACN
Senior Vice President
Nutrition & Product Innovation
National Dairy Council

Mollie Waller
Vice President
Nutrition & Health Promotion
National Dairy Council

REFERENCES:

1. StrategyOne omnibus research "Food Guide Pyramid," July-August 2004.
2. Dietary Guidelines Advisory Committee Notebook, Public Display Copy. August 11, 2004; Part D, Section 5, Page 18.
3. USDA/Agricultural Research Service. *Pyramid Servings Intakes by US Children and Adults, 1994-1996, 1998*. ARS Community Nutrition Research Group website. Available at http://www.barc.usda.gov/bhnrc/cnrg. Accessed April 1, 2003.
4. Goldberg JP, et al. The Obesity Crisis: Don't Blame It on the Pyramid. *Journal of the American Dietetic Association*. 2004; 104(7): 1141-1147.
5. National Dairy Council comments to FR Doc. 03-22763 Notice of Availability of Proposed Food Guide Pyramid Daily Food Intake Patterns and Technical Support Data and Announcement of Public Comment Period, http://www.usda.gov/cnpp/pyramid-update/Comments/oct%2027-2003%20d%20--%201%20comment.pdf, October, 2003.
6. GfK Custom Research Inc. "3-A-Day of Dairy Program Tracker," May 2004.
7. Weinberg, LG, et al. Nutrient contributions of dairy foods in the United States, Continuing Survey of Food Intakes by Individuals, 1994-1996, 1998.

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NATIONAL PORK PRODUCERS COUNCIL

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August 27, 2004

Food Guide Pyramid Reassessment Team
United States Department of Agriculture
Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

To Whom It May Concern:

The National Pork Producers Council (NPPC) and the National Pork Board (NPB) appreciate the opportunity to comment on the "Notice of Proposal for Food Guide Graphic Presentation and Consumer Materials" for the Center for Nutrition Policy and Promotion (CNPP).

Americans young and old have come to recognize the Food Guide Pyramid as the standard by which they should plan their meals. Therefore, we believe the CNPP should continue to use the Pyramid graphic, while further refining the supporting messages to improve the adoption of the Dietary Guidelines recommendations. We believe both generalized and audience-appropriate messages should be developed to support the Pyramid recommendations.

The CNPP has proposed several ways by which it plans to use the revised Pyramid as an educational tool. The "Educational Components" detailed in the public notice seek to use both interactive and print media to convey nutrition and health information to consumers. We applaud the use of the "Interactive personalized guidance tools" as an innovative method of helping consumers to individualize food intake based on personal preferences and nutritional needs.

In developing interactive personalized guidance tools, consideration should be given to practicality, flexibility and ease of compliance. With the variety of food choices available, any interactive tool needs to take into account the diversity of the American diet. As has been done in other programs of the CNPP, consumers must recognize that all foods can be part of a healthful diet, if eaten in appropriate amounts. Consumers taking advantage of the personalized tools should be provided information that details nutrient composition of foodstuffs and portion sizes. Consumers should also be directed to resources that can aide in physical fitness and general health awareness information.

Food choice combined with health education and physical activity can provide consumers with an effective means of combating obesity.

The number of Americans having access to the Internet and personal computers continues to increase, yet we hope that the CNPP recognizes that a sizeable portion of the population remains without this benefit. We urge the CNPP to enhance efforts to reach this important audience by cooperative programs with health organizations and the private sector using printed materials. For those people without access to the Internet, possible channels of delivery could include working with schools, Cooperative Extension, grocery and convenience stores, health professionals and food assistance programs. As organizations representing over 70,000 American pork producers, we hope to also add legs to the dissemination of messages about healthful eating.

The NPPC and the NPB thank you for this opportunity to share our comments. We look forward to the final Guidelines and anticipate the implementation with the hopes of improving the health and well-being of Americans.

Sincerely,

Harry Snelson, DVM

Ceci Snyder

Harry Snelson, DVM
Director, Science and Technology
National Pork Producers Council

Ceci Snyder, MS, RD
National Pork Board

National Nutrition Services

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August 26, 2004

Snyder 1 of 3

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

Dear Reassessment Team:

The purpose of the Food Guide Graphic Presentation and supporting consumer education materials is to translate the 2005 Dietary Guidelines into a message that is easy for the public to understand. This is a daunting challenge. Our understanding of nutrition and health has exploded since the publication of the first U.S. Dietary Guidelines for Americans. Nutrition recommendations have become increasingly more complex. It is extremely difficult to translate such complicated guidelines into simple messages. You have undertaken an awesome task and I applaud your efforts.

As a registered dietitian, I have been invested in nutrition education for over twenty-five years. In the past five years, there has been an escalating interest in the health benefits of omega-3 fatty acids. The term omega-3 fatty acids has become familiar to may consumers and health professionals. However, the public is frequently confused about the information available through the media.

The preliminary report of the Dietary Guideline Advisory Committee, published in May 2004, strongly recommended two seafood meals per week. This recommendation will result in a very significant dietary change for the majority of Americans. Currently, the average seafood consumption in the U.S. is 15.6 pounds per year. This translates to 4 oz. per week or only one seafood meal per week. Americans will be advised to double their current intake.

Due to the significance of this recommendation, I would suggest the following:

1. Give seafood more prominence in the new or revised graphic presentation. The popular Mediterranean Food Guide Pyramid has devoted a distinct section to emphasize the importance of seafood. (See attached image). I would suggest that the U. S. consider a similar level of prominence.

Cindy Snyder, *MPH, RD, CD*
Shoreline, WA • csnyder.rd@verizon.net

Snyder 2 of 3

2. Provide supplemental information on seafood selection, handling and preparation to reduce public confusion.
The American public is intimidated by seafood. Consumers are unfamiliar with the variety of species available. They are not confident about proper selection and handling techniques. Many are afraid about seafood safety. Comprehensive seafood education materials will need to be created for the public either by CNPP or through an established partnership with national seafood organizations.

Health professionals also need seafood education. Like the American public, many health educators are also intimidated by seafood. USDA needs to provide resources and training for health educators so they can inspire their clients to increase seafood consumption. I would recommend that USDA either develop seafood education materials, provide an incentive for the seafood industry to develop the essential materials, or link to available industry materials.

I appreciate your consideration of these suggestions as you consider the Food Guide Graphic Presentation and supporting consumer education materials. Thank you for your tireless commitment to this very significant effort.

Respectfully submitted,

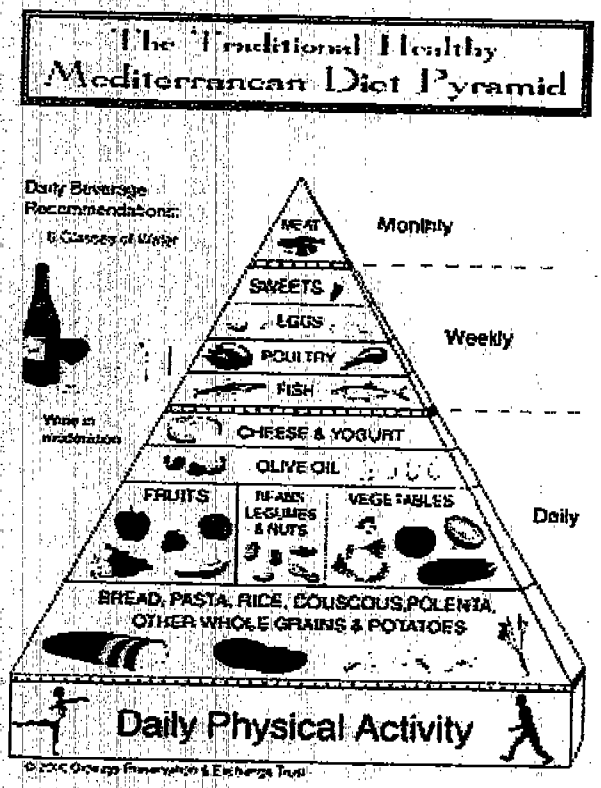
Cindy Snyder

Cindy Snyder, MPH, RD, CD

Cindy Snyder, *MPH, RD*
• *Shoreline, WA* • • csnyder.rd@verizon.net

Snyder 3 of 3

Attachment



***Cindy Snyder**, MPH, RD*

• *Shoreline, WA* • *Tel* • csnyder.rd@verizon.net

AUG 27 2004

Gray 1 of 2

PURDUE
UNIVERSITY

DEPARTMENT OF FOODS AND NUTRITION

August 26, 2004

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

RE: Response to Federal Register Vol. 69, No. 133

Dear FGP Reassessment Team:

We are interns in the Coordinated Program for Dietetics at Purdue University, West Lafayette, Indiana. We would like to offer our comments to the issues outlined in Section VI. A., B., and C.

A.) We would like to keep the overall shape. The graphic is already ingrained in the public's mind. Changing the shape is not necessarily the problem, it is the education. In addition, in changing the shape, Dietetic professionals would loose credibility as the public would assume something was wrong with the old one, as some have speculated. One major overall change would be to remove the number of servings on all mass media venues entirely. This would leave no room for misinterpretation. The pyramid was not meant to stand alone in the first place. The pyramid would only be a symbol, which it should only be. By removing the number of servings, attention may be heightened as people would wonder where the servings went. It is our opinion that showing 6-11 servings from the bread, cereal, and grain group is too vague anyway and not useful. Showing the proportion of foods from each group is more useful for a symbol.

B.) New slogan examples: "It was not meant to stand alone" "My support system is at ...www...FGP.org"

The "support system" would give individuals more individualized information elsewhere. Avenues for the symbol and slogan would be television, billboards, posters in school, on buses, etc... The website should be user friendly and have an easy address. The government should buy the www.fgp.gov or www.foodguidepyramid.gov or www.pyramid.gov to simplify the use of complicated addresses and put all of the campaigns information on one site. A nationwide mailing could be used to launch the campaign. Simple ideas and general messages appropriate for the public would be variety, balance, moderation, and maintenance.

Individualized messages would only be used in education materials and the website. This would lead to less misinterpretation. The costs of these efforts could be offset with partnerships with different food groups. In addition, a comparison to medical costs if prevention is not implemented could justify costs.

C.) An advantage to individualization is personal recommendations. This should only be used in educational material and on the website. One useful piece in information to both the public and professionals would be a calculator to find out the number of servings a person needs from each FGP group where the public can enter their weight, height, activity level, gender, etc... and get their recommended energy intake (or range) and number of servings. This would end the confusion of the range of servings now used. A printable pyramid checklist would help consumers visually keep track of what they are eating.

Sincerely,

Krista Gray Suzanne Braun TusaRebecca Schap Dervise Ugursal
c/o Carol J. Boushey, PhD, MPH, RD

West Lafayette, IN

PURDUE
UNIVERSITY
DEPARTMENT OF FOODS AND NUTRITION

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AUG 27 2004

August 26, 2004

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

RE: Response to Federal Register Vol. 69, No. 133

Dear FGP Reassessment Team:

We are interns in the Coordinated Program for Dietetics at Purdue University, West Lafayette, Indiana. We would like to offer our comments to the issues outlined in Section VI. D., E., and F.

D. The graphic is a good idea because it is highly recognizable. It may be helpful to have information included with the graphic because many people will not go out of their way to look for more details. Perhaps food serving sizes could be on or around the graphic since serving sizes are a common source of confusion.

E. The interactive tool should be:

- easy to use
- colorful
- fun
- culturally appropriate
- account for diseases, conditions, and physical activity levels

Basic information for the interactive tool should provide:

- energy-levels,
- number of servings from food groups recommended based on information from person (e.g. height, weight, sex, physical activity level).

This information could be provided without having to open an account or enter diet recalls.

Planning and assessing information for the interactive tool should analyze the diet entered by the person (e.g. number of servings from different food groups and major nutrients), similar to current healthy eating index. In addition, practical

Glovier 2 of 2

recommendations should be included. For example, if an individual eats an excessive amount of fat and the primary source is high-fat meats, then a message could appear recommending lower-fat versions of meat or other options.

F. TV is probably the best form of media for delivering information about the Food Guide Pyramid because it reaches the broadest, most diverse audience (ethnicity, socio-economic status levels and age). Public service announcements may be an option as well as partnerships with select special interest groups to help with funding. Advertisements should be entertaining, appealing and educational. The recent "VERB - it's what you do" ad campaign is a good example. Radio advertisements could be effective if played on stations that reach the broadest audiences.

The internet is fairly common and a good resource for educators and consumers, but probably not the best form of advertising media for consumers.

Another possibility for advertising information about the Food Guide Pyramid is printing the information on food packaging (milk cartons, food boxes) and grocery bags, making brochures available in the supermarkets (e.g., 5-A-Day campaign), and advertising in printed materials and periodicals, billboards, and public transportation.

Information included on food packaging should include how much of the particular food is a Food Guide Pyramid serving and in which food group(s) the product can be categorized.

Sincerely,

Amy Glovier Kellie Curran Angie Frost Hannah Slack

Amy Glovier Kellie Curran Angie Frost Hannah Slack
c/o Carol J. Boushey, PhD, MPH, RD

West Lafayette, IN

AUG 27 2004

Dawson
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August 25, 2004

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

RE: Request for Printed Comments on new Food Guidance

Dear Team Members,

Thank you for the opportunity to share my comments and recommendations with your team regarding the new Food Guidance to be distributed to the American public in January 2005.

Included you will find notes used for of my presentation at the meeting as well as more specific recommendations that are addressed in the format of the pdf notice that was published on the internet, July 13, 2004.

Since food and nutrition are the essence on which Spirit of Food is based, these comments come well researched. While it may be difficult to recognize the profound effects that nutritional recommendations may have on diagnosed illness of a physiologic nature, my practice has many success stories that attest to this fact.

Several testimonials of patients/clients that are kept on file, indicate that with the proper recommendations and commitment, the desired change can be within reach.

It is with respect that the following is submitted. If I may clarify any of these comments, please contact my corporate offices at (702) 933-4034 or reach me via cell phone# (805) 451-0875. Also, please be aware that my company's services can be contracted for public educational purposes in an interactive presentation format.

COMMENTS IN RESPONSE TO PDF NOTICE, Federal Register, Vol. 69, No. 133, Tuesday, July 13, 2004:

A. Graphic Shape Change?

1. Advantages are that it would be a new look at the old topic.
2. Disadvantages include the rift of a new knowledge base and the current one, creating an opportunity for one factor to claim to be more knowledgeable, while the public would remain in the dark. Also, the costs across all sectors providing nutritional information would be exorbitant and burdensome, creating another opportunity for the American public to be lost in the shuffle. Then there is the issue of what the new shape may be; involving many debates, therefore cost time and again the consumer is not served effectively.

Dawson 2 of 5

3. In the event that another shape is the choice, my recommendation would be a bowl since it is a kitchen item and the association with food is more likely.

B. Usefulness of both motivational/awareness and education messages.

Through survey of individuals in my travels this past summer, with exposure to students in an educational setting, to executives, more people have the message that nutritional information is a part of a healthy life. Information warnings that eating improperly can lead to diabetes, coronary disease, cancer, etc. are beginning to hit the comfort zone. People who eat incorrectly are simply more uncomfortable and more susceptible to pain, disease and emotional illness. It has been my experience that positive motivation must be supported by knowledgeable choices for change.

One approach may be a marketing strategy that alternates the message. For example, one month use the media to send caution messages describing one particular symtomology. The next month could be a guiding month, indicating specific nutritional steps to use to eliminate the possibility of falling into the disease mentioned previously. These messages provide knowledge leading to better choices, not necessarily products required to obtain the goal. This would leave decision to the individual and therefore more personal accountability for health and wellness.

Now that motivation or at least awareness is beginning to develop, stepping in with a trail to the data is the challenge and imperative action to achieve the goal of improved health for the American public.

How that is accomplished may be through a trail map type of icons/pictures that are delivered in one of two ways or both, numeric and pictorial on the Pyramid itself. Sounds may be added when viewing online to move people into sites that deliver data.

One example may be pictures that may actually look like a trail in the woods with a path of "bread crumbs" leading to the goal of appropriate foods. Or another style, a numeric equation, complete with each step attached to foods, with a solution containing the goal meals. And for those auditory learners sounds such as a doorchime, hall footsteps, with kitchen sounds of food preparation, leading to a meal served at a table, all of which deliver food guidance.

C. Advantages/Disadvantages to individualized/generalized

Unanimously, my audiences, or people that have been in conversation with me in regards to nutritional information, prefer to be given individualized data. This can be done in an audience setting, via messages that speak of food types, the properties they possess when ingested, and available choices. This is my chosen work, with **Food Physics and Body Dynamics™**. Using knowledge as a tool people are choosing to be responsible for their decisions by 'doing the research'. This is going to be one of the requirements in the next nutritional era. We have gotten away from nutritional education in the America school systems at an age that could have lifelong effects. This is one of the most important actions we must begin to restore health to the American public.

Food Intake Items mentioned in Section III, B. 1. Paragraph 1, of the Federal Register, / Vol. 69, No. 133/Tuesday, July 13, 2004, age, sex, and activity level must also include the following items to be complete:

Climate/Locale – Availability of foods in a specific region or locale, must be considered. Generally, foods that grow and thrive in an area are best suited to sustain life in that area with fewest additional supplements required. This

Dawson 3 of 5

presumes that the food is handled properly by heating to degree to eliminate unwanted bacteria. Also, that proper hand and food washing takes place. While the body uses some "friendly flora" intestinally, it is good to be in charge of that bacteria presence.

Career choices – Foods that support mental activity are not always the same ones that support our muscles so a healthy balance needs to be addressed in the educational process. This would address the protein/carb craze that continues without proper education of the public about balanced choices. It will be good to remind people that the body is our gift to reside within and to care for appropriately, encouraging responsible choice to experience better quality long term life.

Temperature – Although this is listed last, it may be of primary impact. This particular era of human existence has come to rely on refrigeration for the preservation of our foods. Consideration that humankind has now begun to change our internal climate with the foods that we eat. We drink iced beverages. In doing so, the cold passes our thyroid, parathyroid and blood pressure regulator in our neck and throat. This may be sending the wrong signals to our metabolic system managed by hormonal signals.

Then there is the fact that we handle ice as though is could not carry the bacteria from our hands or the containers it is managed with, stored in, or distributed by. Messages that include proper cleaning of all items that are used in food prepare; etc. may be used to correct this short fall.

Additionally, we are now a generation of microwave users. However, many of us don't know how to properly use a microwave to heat the foods to a temperature to reduce or eliminate bacteria while we retain flavor and nutrients. Messages from microwave manufacturers that address these issues may need to be stressed.

D. Focus on core messages

The plan to use the Pyramid branding the messages targeted appears to be in line with the 'trail guidance' that was previously address in response to item C (above). There is simply too much data for Pyramid alone to relay pictorially to create better health through nutritional awareness.

There may be some difficulty as other agencies are now utilizing the shape to convey their specific method. Is the Pyramid trademarked? If so can we use that ™ symbol to recognize the endorsed information in the future?

E. Key components for effective interactive educational tools. Several tools that are currently on the market will assess the food intake and report to the individual the caloric value, vitamin and mineral content, the food value, etc. As is the case in any self-reliant system, there is the error factor, knowledge required inputting data, and simply 'cheating' (on themselves). Some of these systems have created a human monitor system, like WeightWatchers, to address these difficulties.

Food Physics and Body Dynamics™ is designed to be an interactive presentation at job sites that delivers personal food intake guidelines during interactive presentations,

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in follow-up 'mini' consultations, and when needed in-depth personal one-on-one meetings. Teaching recognition of body signs and behavior that responds to nutritional awareness/choices in a group setting empowers and inspires, not just one, but the group. That power combined with the knowledge of food function as noted by the color and flavor of that item; will give audiences the tools needed to make better food intake choices in all walks of life, locations, and in the age progression.

F. Channels of delivery of Food Guidance System.

During my presentation on August 19, 2004, before the panel, I stated that there were several methods that people are known to receive their information. Readers, listeners, tactile and those that pattern after role models. One of the most profound learning methods appears to be that of patterning after role models. Thus the function of recruiting the services of contractors or employing those that can deliver the information and use it in their daily lives.

Thank you for taking the time to review these comments and recommendations. The draft of my presentation follows to serve as a reminder. Again, I would like to offer my services to deliver this information to the American public. My business plan is one that would allow me to travel for one or two weeks per month, during which I would be sharing the protocol, Food Physics and Body Dynamics™. I would be happy to demonstrate it to the CNPP staff for their personal and professional benefit this autumn. I believe it would be a significant tool to manage obesity. It may be something that could be included in the conference on obesity in October.

Please contact my newly formed corporate offices for more information. The address is 4535 W. Sahara Ave. Suite 204, Las Vegas, phone number (702) 933-4035.

It is my sincere desire that these comments serve the greater good of the project to improve the health and wellbeing of the American public through quality nutritional knowledge and choice.

Sincerely,

Laura L. Dawson

Laura L. Dawson, Dipl. Ac.

NOTES FROM AUGUST 19, 2004 MEETING AT USDA, CNPP, WASHINGTON, DC.

Laura Dawson
Hold a master's in Acupuncture and Oriental Medicine
Accredited School, SB College of Oriental Medicine
Nationally Certified Practionier of Acupuncture and Oriental Medicine, By NCCAOM

Established nutritional education and consultation business in 1998, Spirit of Food.

Dawson 5 of 5

Dedicated to EDUCATE, INSPIRE, AND EMPOWER individuals to achieve and maintain optimum health and enjoy life more fully.
We have developed a method, Food Physics and Body Dynamics™, as a public, interactive presentation to that end.
Nutrition has been the focus of this method to improve and enhance health, thus my presence here today.

In the interest of time I will address my comments to pros/cons of indiviualize versus generalized.

Food Intake patterns:
In additional to AGE, SEX(GENDER), PHYSICAL ACTIVITY

E. Climate/locale – temperature, foods available
F. Genetic background

CLOSING:
It is my hope that the communication tools required to support this added data support the selection for INDIVIDUALIZED information.
It is time that we TEACH at a personal level, the great power that taking responsibility for knowledgeable INDIVIDUAL choice imparts.
In additional to all of the wonderful media tools available, a simple face-to-face, teachable process is of GREAT reward, especially when providing health/life-enhancing data.
There are several types of learners;

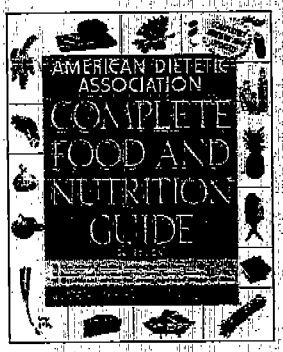
1. readers,
2. listeners,
3. sensory
4. and those that model after role models. I believe this to be one of the most profound learning methods

It is therefore essential to enlist quality stakeholders, as is diligence to promote health through nutritional education. With knowledge comes the power to change…

1. diabetes Type 2
2. cardiovascular diseases
3. chronic illness

The American public enjoys the right to independent choice. It is one of our fundamental rights and one of the things that makes our nation uniquely America.
LET US SUPPORT THAT RIGHT TO CHOOSE WITH THE KNOWLEDGE TO MAKE THE BEST CHOICE.

AUG 27 2004



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DUYFF ASSOCIATES
FOOD AND NUTRITION CONSULTING
ST. LOUIS, MO
www.duyff.com

August 25, 2004

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

As a food and nutrition educator, author, and consultant, I am pleased that dietary guidance for the American public is under careful review to reflect current science and public health issues, and to consider an approach that not only provides guidance but that also helps consumers of all ages apply the guidance to their own individual nutrition needs, food preferences and lifestyles.

As a nutrition educator working closely with the pre-kindergarten through grade 12 school community, I urge the committee to:

- Plan *age-appropriate* implementation strategies, graphics, key messages, etc. to engage young people (grade school, middle school, high school) in using food guidance to meet their individual nutrition needs.

- Involve those of us who create curriculum and textbooks for health, family and consumer science, culinary nutrition and related curriculum in designing those age-appropriate strategies early in the process. Classroom teachers and curriculum designers in family and consumer science, science, and health play a key role in educating youth, and serve as effective partners in updated food guidance initiatives. Textbooks -- often used for five years or longer – often provide outdated food guidance; those designing curriculum need updated information as soon as possible.

As an author of science-based nutrition books for the public, I urge the committee to:

- Reflect the complexities of today's food supply: fortified foods with nutrient profiles that are different from traditional foods, mixed-ingredient foods, diversity of choices including more ethnic foods, various forms of food (fresh, frozen, canned, dried) as a way to help consumers meet dietary goals, among others

- Offer easy-to-use guidance to reflect how much is enough of various foods, as a way to help address overeating

- Recognize that individual eating plans need to not only reflect different calorie levels, but also different development/age needs, different food styles (e.g. vegetarian eating), among others

- Provide guidance on adequate fluid intake, including beverage choices

- Build active living into the guidance, as a way to address energy balance

- Honor the link between flavor/enjoyment and healthy eating in messages about dietary guidance

- Provide opportunities for nutrition professionals, including those who communicate with consumers, to be part of the communications strategy for updated food guidance *early*, by providing us with the information we need to be proactive before -- as soon as -- guidance is released to the public

Again, I commend the USDA for their commitment of time and energy necessary to update and revise the current Food Guidance System.

Roberta L. Duyff, MS, RD, FADA, CFCS

Author, *American Dietetic Association Complete Food and Nutrition Guide* (John Wiley & Sons trade book)
Nutrition and Wellness (Glencoe/McGraw-Hill secondary text)
Food and Nutrition Consultant/President, Duyff Associates

AUG 27 2004

Bernstein 1 of 1

Phylicia Bernstein
145 S. Barbara Way
Anaheim, CA 92806

Food Guide Pyramid
Reassessment Team
USDA Center for Nutrition Policy
3101 Park Center Drive Rm. 1034
Alexandria, VA 22302

August 14, 2004

To Whom it may Concern

My name is Phylicia Bernstein. I am a registered nurse and I am writing to share my thoughts regarding changing the food pyramid.

As a nurse, I have some training in nutrition and I have tried to follow the new food pyramid and the low fat suggestions. I am 57 years old and my weight maxed out at 315 pounds. I knew if I didn't do something I would probably die. I considered many of the diet plans available and I knew that I would have to feel satisfied or I would never stick to it. I decided to go on Atkins low carb program and I now weigh 245 and I am continuing to loose weight. If you look at the Atkins plan, it is all natural foods with no trans fat and low carbohydrate. My LDL cholesterol went from 137 to 100, HDL 80 and my triglycerides went from 103 to 60. I have never felt better, more energy, I was able to go off my blood pressure medication. I plan to stay on a low carbohydrate diet for the rest of my life. I see people in my workplace cafeteria and all they eat is high carbohydrate foods and they are all overweight. I watch what people put in their shopping carts at the grocery store and I am shocked at the amount of carbohydrates . Animal fat is not the problem. The problem is most people don't like fruits and vegetables and load up on pasta, bread, and potatoes.

Thank you for finally reassessing the food pyramid.

Sincerely,

Phylicia Bernstein RN

AUG 27 2004

Manhattan Beach, CA

August 26, 2004

Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive
Room 1034
Alexandria, VA 22032

Rebele 1 of 6

Dear Reassessment Team:

I am writing in response to the call for comments on the proposed Food Guidance System. As a practicing Registered Dietitian for the past four years, I have used the current Food Guide Pyramid in educating numerous patients and community groups about healthful eating. I feel that although the Food Guide Pyramid is a useful tool, it has many shortcomings, as pointed out in the Federal Register of July 2004. I agree that changes need to be made to allow consumers to use the Food Guidance system to make their food choices, however I am concerned that similar problems with the current system will occur with the proposed one.

Over the years of practicing as a Dietitian, I've learned that most people I've come in contact with do not want vague references to what they should eat, such as "limit", "avoid", "go easy" or "eat in moderation". Most consumers want to know exactly what foods they should eat, how much of it should they eat and what they should not eat. While I understand that the Food Guide Pyramid was designed to be used in conjunction with a 32-page booklet providing useful information (which I only became aware of one year ago), I feel that it has failed. In our society of busy, hectic lifestyles more consumers are eating and shopping in a rush. For the new Food Guidance System to be successful, it should provide as much information that would be useful to the consumer without overloading them. Additional and more specific individualized information can be accessed by those interested.

Enclosed in this package are suggestions presented by myself in cooperation with Melissa London, RD and Julia Levine, MS, RD for a graphic presentation of a food Guidance System. We feel that using a traffic light graphic with the red, yellow and green lights representing foods to avoid (red/stop), foods to allow in moderation (yellow/caution) and foods to eat plenty of (green/go) presents the Food Guidance System from a health perspective that can be used by most cultures, age levels and education levels. This simple graphic is easily recognized and most people understand the meaning of the red, yellow and green lights.

This graphic could be used on food packaging (in place of the current Food Guide Pyramid) highlighting what category that food item falls into (red, yellow or green). Having the graphic on food packages will aid the consumers at the point of sale to decide if they should purchase it, then decide how and when it should be consumed. Placing the graphic on food packages may cause some issues with food companies, especially if their food falls into the yellow/caution or red/stop category, however we feel that this is important information for the consumer to have. Many consumers do not interpret the nutrition information labels correctly and are not able to make an informed decision about that food item. The red/yellow/green

symbol will make the process easier for them. This might also prompt the food companies to modify their food products to be healthier thus gaining it a better symbol.

In addition to the traffic light graphic, we have included a very simple graphic representation of what a food plate should look like vs. the current system's serving sizes and servings per day. In my experience, most consumers are not aware of what a proper serving size is or how many to eat. They are often overwhelmed by the number of servings they think they need to eat everyday, not realizing that a serving could be as small as 1 ounce or ½ cup. Many consumers think that a serving size is the amount of food on their plate or the amount of food in a package. The suggested plate visual with everyday items to compare food servings to is clear and easy to understand. We have used these types of visuals successfully with our patients (as verbally reported to us by our patients).

In addition to the above suggestions, the following is in reply to Part VI of the Federal Register "Topics of Particular Interest to CNPP":

A. Advantages/Disadvantages of the Current Graphic…:

Advantages: The current shape is widely recognized and has been in use for many years. Consumers are aware of the symbol and what it represents. The size of the food groupings visually represents which groups to eat more or less of.

Disadvantages: While the graphic is recognizable, many consumers do not interpret it correctly in terms of how many servings to eat and what a serving size is. It does not distinguish whole vs. refined grains or healthy vegetable oils vs. animal fats.

Overall, I do not think it would be important to keep the current shape. It will take some time to educate consumers about a new graphic, however, I think that many consumers are frustrated with the current system and might embrace a new one easily, so long as it is not as cumbersome as the current one. The pyramid may be kept as part of the education materials that will accompany the new Food Guidance System and be used more as a tool in addition to a new graphic to show proportionality.

Shapes to consider: See the explanation above for the traffic light. A plate with food would also be a great way to communicate portion sizes.

B. Usefulness of the Proposed Strategies…:

Using a graphic to identify the "brand" of the Food Guidance System is a great idea, but I think a stand alone educational tool would be a better way to go. In this fast-paced world, people do not have time nor do they want to dig-deeper to figure out what the rest of the message is. They want information that is fast, convenient and easy to interpret.

A well-written slogan is a great idea to spread the word on the new system, if it is designed as well as most successful commercial food ad campaigns are (it will have to compete with these popular messages) vs. most public health approaches. It should be catchy, flashy and convey appropriate information.

C. Advantages and Disadvantages of Individualized Guidance…:

Individualized guidance would be the ideal way to provide the appropriate information to all demographic groups. This type of system would most likely have the greatest success in behavior changes due to the specificity of the message. The materials should be developed using the target groups as advisors and then need to be tested to ensure the messages are well understood. These targeted educational materials should be disseminated via the appropriate channels, i.e., schools, clinics, doctors offices, colleges, fitness centers, etc., to reach as many consumers as possible.

A downside of individualizing messages is that no matter how well it is designed, some groups will still be left out. If there are not any general or universal messages, these consumers may not receive any messages at all.

General health information would be best to include in universal messages such as (but not limited to):

- eating 5 or more fruits and vegetables a day
- limiting alcohol
- exercising daily
- limiting animal fats
- eating more whole grains and beans
- limiting fried foods
- limiting candy and sugar intake

D. Advantages and disadvantages of Focused Core Messages...:

While branding the Food Guidance System will likely help with consumer recognition but as mentioned earlier, using the graphic only as brand identification would be a disadvantage due to the speed at which many consumers require their information. Core messages may be missed if not presented on the graphic. The various core messages might compete with each other, further confusing the public. Too many core messages without a tool to tie them all together may miss those individuals that they are targeted at. The messages should be used in conjunction with the graphic, not as the core to the program. The graphic should communicate essential information that is clear, concise, not confusing or ambiguous.

E. Key Components for Effective Interactive Educational Tools:

Interactive educational tools have had great success with behavior changes, especially if they are personalized. Developing websites and CD-ROM's are great ways to provide more complex food guidance to consumers. A tool that allows the consumer to individualize the program as close to their lifestyle would be beneficial. General information should be based on their age, sex, height and weight. This should be sufficient to provide the minimum amounts of food to consume. The information provided could range from a meal plan to just the amounts of servings of food from each food group to eat each day (let them decide when they will eat it).

For further individualization, some elements to consider for personalization should be:
Age, sex, current eating habits, daily activities, food preferences, cultural food habits, nutrition related disease diagnosis, and food allergies

F. Channels of Delivery of the Food Guidance System:

To reach most consumers with the messages there should be a multi-channel advertising campaign. This should include television, radio, print and internet ads that are targeted to each demographic.

For educators, print and internet based-materials are the best way to disseminate information with copy-ready materials to be used to pass on to clients and patients.

A school-based curricula should be developed and implemented with the Food Guidance System core messages hitting elementary, middle and high school students at critical ages where food habits are formed.

Using the internet as the key channel for delivery of information will likely miss the majority of the population. Many populations including low income, low literacy, elderly, computer illiterate, and the very young do not have access to the internet and would likely miss the information. Other channels would need to be identified for these groups to gain the information. These audiences may be reached via health educators in schools, community groups, senior centers, after-school programs, pre-schools, clinics, libraries, and doctors offices. Written and oral materials should be used and tailored to their demographics.

Thank you for considering the traffic symbol graphic as well as the above recommendations to the proposed Food Guidance System. We hope you will consider these ideas when developing the new system.

Sincerely,

Tara L. Rebele, RD

Tara L. Rebele, RD
Centinela Hospital Medical Center
Clinical Dietitian
University of Southern California
Master of Public Health Student

Manhattan Beach, CA

Rebecka 5 of 6

SPEED FORWARD WITH HEALTHY EATING

- Sausage & Bacon
- Fast Food
- High Fat Foods
- Processed Cheese
- Processed Grains

- "Junk Food"
- Bakery Goods (cookies, pies, cakes, etc)
- Candy
- Candy Bars
- Donuts
- Regular Soda

(red)

- Whole Eggs
- Red Meats
- Deli Meats/ Processed Meats
- Lowfat Cheeses
- Lowfat Dairy Products
- Juice

CAUTION
EAT 2 TO 3 TIMES A WEEK

(yellow)

- Fruits
- Any Vegetables
- Whole Grains – wheat, oat, barley, bran, rye
- High Fiber Cereals
- Fat Free/Nonfat Dairy Products

- Seeds
- Nuts
- Avocado
- Olive & Canola Oil
- Lean Meats
- Egg Whites
- Fatty Fish
- Beans & Lentils

(green)

EXERCISE DAILY

Rebecle 6 of 6

SPEED FORWARD WITH HEALTHY EATING

- Seeds
- Nuts
- Avocado
- Olive & Canola Oil
- Lean Meats
- Egg Whites
- Fatty Fish
- Beans & Lentils

- Fruits
- Any Vegetables
- Whole Grains
- High Fiber Cereals
- Fat Free/Nonfat Dairy Products

EXERCISE DAILY

- Whole Eggs
- Red Meats
- Deli Meats/ Processed Meats
- Lowfat Cheeses
- Lowfat Dairy Products
- Juice

- Sausage & Bacon
- Fast Food
- High Fat Foods
- Processed Cheese
- Processed Grains

- "Junk Food"
- Bakery Goods (cookies, pies, cakes, etc)
- Candy
- Candy Bars
- Donuts
- Regular Soda

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August 24, 2004

Inglewood, CA

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

Dear Reassessment Team:

The current Food Guide Pyramid is a useful tool if the consumer has been educated on how to use it: however, it seems the current pyramid graphic misses many key points that need emphasized. One key point the current graphic does not communicate to the consumer is what types of food provide nutritional benefit and should be eaten often. It doesn't tell the average consumer there is a difference between the healthy whole grains and the less healthy processed grains, the difference between the healthy fats and unhealthy fats, the difference between healthy meats and unhealthy meats, etc. The second fact the average consumer seems to misunderstand from the current graphic depictions is what exactly a serving size is. Our experience working as Registered Dietitians with individuals has shown us most consumers think of a serving as one plateful or one piece of whatever. They are unaware of measurements that represent servings. Finally, we feel that there is not enough emphasis placed on the importance of eating vegetables and fruits and exercising daily. These should be stressed because of their many nutritional and health benefits.

Our suggestions for changes are attached in an easy to understand graphic that can be used across all cultures and most education levels. The graphic does not emphasize portion size as measurements, but rather how to plate food and what foods are the foods to choose from on a daily (green), less frequent (yellow), and infrequent/never (red) basis. It highlights the foods that are nutrient dense, protective, and have disease preventative benefits for the body. Additionally the graphic uses a traffic light that most people can understand as red meaning stop, yellow meaning caution, and green meaning go. Daily exercise is also given emphasis to as being a part of a healthy diet.

Thank you for the opportunity to present our ideas for changes to the Food Guidance System and we hope they will be considered. We can be reached for additional comments/questions via email at melissalondon1@yahoo.com or julialevine@comcast.net

Sincerely,

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AUG 27 2004

August 25, 2004

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Potomac, Maryland

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:

Advantage of retaining the pyramid shape:

- The public are finally familiar with the food guide pyramid.

Disadvantage of retaining the pyramid shape:

- People are consuming too many bread items in the form of high calorie foods such as muffins, cookies and other pastries.
- Protein and dairy sections of the pyramid appear less important than the bread section.

Motional awareness and educational message:

- Both are important for different reasons.
- People of all ages need motivation to make better educated choices.

Individualized guidance contrasted with generalized messages:

- Generalized messages are good for simplicity.
- Individualized advice is just that – individualized.

Core messages contrasted with graphic educational messages:

- Core messages can be more specific.
- Graphic educational messages good for illiterate, low income groups.

Effective interactive educational tools key components:

- Simple/Large Print
- Basic
- Colorful
- Realistic

Sincerely,

Paulette Helman

Paulette Helman, MS, RD
Public Health Nutritionist
DC Office on Aging