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October 27, 2003

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Food Guide Pyramid Reassessment Team
USDA Center for Nutrition Policy and Promotion
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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. 68 Federal Register 53536, September 11, 2003

FOOD GUIDE PYRAMID REASSESSMENT COMMENTS

The National Cattlemen's Beef Association (NCBA) appreciates the opportunity to provide comments on the U.S. Department of Agriculture (USDA), Center for Nutrition Policy and Promotion's (CNPP) proposed Food Guide Pyramid Daily Food Intake Patterns and Technical Support Data. Producer-driven and consumer-focused, NCBA is the trade association of America's cattle farmers and ranchers, and the marketing organization for the largest segment of the nation's food and fiber industry.

NCBA commends USDA's leadership in reassessing and updating the Food Guide Pyramid—the nation's primary educational tool to help Americans make daily food choices to promote health and prevent disease. This is a significant undertaking for CNPP and we applaud the agency for conducting the review in a science-based manner.

NCBA concurs that this reassessment is timely given changes in scientific and medical knowledge, changes in nutritional standards and goals established by the IOM Dietary Reference Intakes released between 1997 and 2002 and the *2000 Dietary Guidelines for Americans*. Other recent information such as changes in food consumption reported in the USDA Continuing Survey of Food Intakes by Individuals (CSFII) 1994-1996 and updates in the nutrient composition of the U.S. food supply signify further the need for such a scientific review.

Due to the significance of this notice, the limited time to review and prepare comments, and the lack of pre-cursor data used by CNPP, NCBA requested an extension of the comment period and that CNPP make available the data that was used to make their assumptions. The request for extension of the comment period was denied. Therefore, we are submitting today the most detailed comments as possible under the time limitations. However, no comment has been received from CNPP regarding our request for additional data. We believe that this data should have been made available per the Freedom of Information Act, Data Quality Act and subsequent guidelines issued by the Office of Management and Budget in 2002 and we urge CNPP to disclose the data now and similar data in the future.

CNPP solicited comments on all aspects of the proposed Daily Food Intake Patterns and the accompanying technical support data tables. In addition, CNPP expressed interest in receiving

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comments on several specific issues and questions. NCBA offers the following overarching comments and then will address specific issues and questions in turn.

CNPP's Proposed Daily Food Patterns and Technical Support Data May Contain Incomplete, Outdated and Inaccurate Information on Beef Products

CNPP's proposed revisions to the daily food intake patterns may not comply with CNPP's own stated philosophical goals for the Food Guide Pyramid and the technical support data may not accurately and fairly depict the nutrient composition of beef products that are currently available in the marketplace today. Our concerns stem from the fact that CNPP may not have used the most recent beef nutritional data and/or the leanest beef products in calculating the nutrient profiles for the meat group. Failure to use the lowest fat content of beef products would produce significant errors in the nutrient profiles for the group and result in corresponding implications to other food groups as well as additional fat. It would also inject unjustifiable prejudice against beef products in the resulting food guide and impair the scientific credibility and integrity of the nation's premier nutrition educational tool.

We are, however, unable to ascertain with certainty the validity of CNPP's calculations of the nutrient profile for the meat group due to lack of sufficient documentation and substantiation in the data available electronically or in hard copy as outlined in its notice of September 11, 2003 [68FR53536-53539]. As mentioned above, our request for access to supplemental data has not been addressed by CNPP.

CNPP states that "Proposed revisions to the daily food intake patterns are based on the same philosophical goals that were used in developing the original Pyramid." One of the eight philosophical goals underpinning USDA's food guidance has been to "...allow maximum flexibility for consumers to eat in a way that suits their taste and lifestyle while meeting nutritional criteria. The goal of allowing maximum flexibility was one reason that CNPP established nutrient profiles for food groups using foods in their forms that are lowest in fat and that have no added sugars."¹ USDA stated that

"Once vitamin, mineral, and protein needs are met, theoretically, the balance in calories could be made up by fat and added sugars. Total fat intake is limited by the goal of keeping it below a specified percentage of calorie intake. This approach allows consumers to decide which foods they prefer as sources of fat and added sugars. A food guide that rigidly proscribes certain foods is not likely to be followed consistently."²

CNPP states that it used foods in their lowest fat forms without added sugars to develop the nutrient profiles for each food group. These nutrient profiles form a cornerstone in CNPP's development of the daily food intake patterns. If there are errors in the nutrient profiles, then these errors could result in inaccurate, misleading and incorrect daily food intake patterns.

If CNPP's proposed nutrient profile for the meat group did not use beef products in their lowest fat form, then this would adversely affect CNPP's development of food patterns that would

¹ USDA's Food Guide: Background and Development, USDA/HNIS, Misc. Pub. 1514, September 1993, p. 6.

² IBID.

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provide maximum flexibility for consumers in choosing sources of protein foods within the fat and calorie limits specified.

We have two reasons to believe that CNPP did not use the lowest fat content of beef products to develop its proposed daily food intake patterns:

- CNPP may not have used Standard Reference, Release 16 (SR 16)—the most accurate and current nutrient data now available—to derive the lowest fat content of beef products, and
- CNPP may not have used the leanest version of the beef products profiled.

Most Current Beef Data May Not Have Been Considered

SR 16—USDA's National Nutrient Database, was updated on July 30, 2003, likely after CNPP initially conducted its reassessment analysis.³ CNPP needs to use the nutrient data for beef products from SR 16 to ensure that the future food guide is the most up to date scientifically. According to USDA's administrative report for SR 16, "Several major changes were made to the database since the last release."⁴ Among the major changes listed was a change in trimmed retail beef cuts. Specifically the report states

"In past releases, data representing beef retail cuts trimmed to 1/8" external fat were derived by regression equations using values from beef retail cuts trimmed to 1/4" external fat and 0" external fat. This release will include new analytical data for many retail cuts trimmed to 1/8" external fat as well as updated values for many cuts trimmed to 0" external fat. Data for beef retail cuts trimmed to 1/4" external fat will be phased out as new corresponding 1/8" fat trim data becomes available."⁵

In addition, previous Standard Reference releases included 1/8" trim data on cuts analyzed as "lean and fat." SR 16, for the first time, lists 1/8" trim cuts as "separable lean only."

These changes are meaningful and dramatic and reflect the beef industry's considerable efforts to meet consumer demand and expectations for lean beef. The changes also accurately reflect what is available to consumers in the marketplace. In fact, SR 16 documented seven additional lean cuts of beef above the previous release. There are now at least 19 cuts of lean beef—many of which are the most popular cuts among consumers. (USDA defines lean as less than 10 g of total fat, 4.5 g of saturated fat and 95 mg of cholesterol per serving and per 100 g.) While it may surprise some to learn the extent to which lean beef has become widely available and consumed in the marketplace, it reflects the hard work and resources that America's cattle farmers and ranchers have invested to respond to governmental recommendations and consumer demand. CNPP needs to accurately account for these substantial changes that have already occurred in the marketplace.

³ U.S. Department of Agriculture, Agricultural Research Service. 2003. USDA National Nutrient Database for Standard Reference, Release 16. Nutrient Data Laboratory Home Page, <http://www.nal.usda.gov/fnic/foodcomp>

⁴ Composition of Foods Raw, Processed, Prepared. USDA National Nutrient Database for Standard Reference, Release 16, July 2003, p. 1.

⁵ IBID., p. 2.

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Our analysis of nutrient database (NDB) codes for ground beef and beef cuts in the CSFII Primary Dataset for Survey Foods and the corresponding NDB in SR 16 showed at least 15 beef products that were newly released in SR 16 that were leaner—in many cases dramatically leaner—than previously reported data. Appendix I contains the results of this analysis.

The following example illustrates the magnitude of the difference. CSFII Primary Dataset for Survey Foods code 13204 (beef, round, tip round, select, separable lean only, ¼" fat, cooked, roasted) was 30 percent higher in saturated fat and 32 percent higher in total fat than SR-16 NDB 13426 (beef, round, tip round, select, separable lean only, 0" fat, cooked, roasted).

Leanest Form of Beef Products May Not Have Been Considered

In addition to possibly not using the most current nutrient data on beef products, CNPP may not have used the leanest form of beef products (ground beef and cuts) in calculating the nutrient profile for the meat group. This is because CNPP may have used *separable lean and fat* rather than the leaner form which is *separable lean only*. The difference between the two categories is substantial. "Separable lean and fat" by definition includes the trimmable outside fat (the ¼" fat) and seam fat—in essence, the visible fat. "Separable lean only" data are taken from cuts that have had all the "trimmable" fat removed prior to analysis. That is, all the trimmable outside and seam fat have been removed, and the data reported on the remaining lean muscle portion only. Thus, "lean and fat" will have a higher total fat and saturated fat content than the "lean only" data. (In both cases the data are reported on cooked product.)

In our analysis of nutrient database (NDB) codes for ground beef and beef cuts in the CSFII Primary Dataset for Survey Foods compared with the corresponding NDB in SR 16 we identified 54 cases where beef products—again, many of the most popular cuts among consumers—for which the "lean only" had significantly lower fat and saturated fat content than the "lean and fat" version. Again, in many cases the "lean only" version is dramatically leaner than the "lean and fat" version. (See Appendix I.)

Table 1 below shows the percent difference in total fat and saturated fat for 10 of the top 21 most popular beef cuts between using the leanest version of the relevant beef product and the version listed in the CSFII Primary Dataset. These 10 cuts represent over 21 percent of the total retail beef cut pounds. These cuts, on average, are 56% leaner in total fat and 58% leaner in saturated fat. Taken together, these cuts represent a significant amount of beef products currently in the marketplace. Thus, failure to use the leanest version of beef products would significantly affect the nutrient profile of the meat group.

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Table 1 Percent Change in Total and Saturated Fat Using Lean Form of 10 of 21 Most Popular Beef Cuts Listed in CSFII Primary Dataset

NDB code ¹	Description	Calories per 3 oz. avg	Fat (g) per 3 oz.	Fat % decrease if use leanest	Sat. Fat (g) per 3 oz.	Sat Fat % decrease if use leanest	% pounds sold at retail ²
13127	Beef, rib, small end (rib 10-12), all grades, separable lean and fat, 1/4" fat, cooked, broiled	286	22.083		8.942		
13184	Beef, rib, small end (rib 10-12), all grades, separable lean only, 0" fat, cooked, broiled	181	8.755	60.4%	3.536	60.5%	3.76%
13282	Beef, short loin, top loin, all grades, separable lean and fat, 1/4" fat, cooked, broiled	244	16.796		6.647		
13448	Beef, short loin, top loin, all grades, separable lean only 0" fat, cooked, broiled	168	7.140	57.5%	2.720	59.1%	3.41%
13127	Beef, round, top round, all grades, separable lean and fat, 1/4" fat, cooked, braised	211	9.715		3.672		
13184	Beef, round, top round, all grades, separable lean only, 0" fat, cooked, braised	169	4.260	56.5%	1.462	60.2%	3.38%
13278	Beef, short loin, top sirloin, all grades, separable lean and fat, 1/4" fat, cooked, broiled	219	13.098		5.219		
13454	Beef, short loin, top sirloin, all grades, separable lean only, 0" fat, cooked, broiled	162	5.780	55.9%	2.252	56.8%	2.37%
13182	Beef, round, bottom round, choice, separable lean and fat, 1/4" fat, cooked, braised	211	16.210		5.712		
23622	Beef, round, bottom round, choice, separable lean only, 0" fat, cooked, braised	194	7.671	49.7%	2.643	53.7%	2.01%
13152	Beef, round, full cut, choice, separable lean and fat, 1/4" fat, cooked, broiled	204	11.577		4.386		
13156	Beef, round, full cut, choice, separable lean only, 1/4" fat, cooked, broiled	162	6.213	46.3%	2.176	50.4%	1.62%
13022	Beef, retail cuts, brisket, whole, all grades, separable lean and fat, 1/4" fat, cooked, braised	327	26.826		10.523		
23585	Brisket, retail, separable lean only, 1/8" trim, all grades, braised	167	5.103	81.0%	1.956	81.6%	1.58%
13192	Beef, round, tip round, all grades, separable lean and fat, 1/4" fat, cooked, roasted	199	11.254		4.267		
13424	Beef, round, tip round, all grades, separable lean only, 0" fat, cooked, roasted	150	5.015	55.4%	1.751	59.0%	1.17%
13184	Beef, round, eye of round, all grades, separable lean only, 1/4" fat, cooked, roasted	143	4.165		1.513		
13418	Beef, round, eye of round, all grades, separable lean only, 0" fat, cooked, roasted	141	3.995	4.1%	1.445	4.5%	1.04%
13439	Beef, tenderloin, all grades, separable lean and fat, 0" fat, cooked, broiled	200	11.178		4.293		
13442	Beef, tenderloin, all grades, separable lean only, 0" fat, cooked, broiled	175	8.075	27.8%	3.018	29.7%	1.04%
	Average 10 of Top 21 Cuts Sold at Retail	227	14.193	56.3%	5.517	58.4%	21.38%
	Average if Leanest	167	6.200		2.294		

¹ First line of entry is Nutrient Database (NDB) codes, description from CSFII Primary Dataset. Second line of entry is corresponding NDB in SR 16.
² Data from Freshlook Marketing, June 2003.

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The following example illustrates the magnitude of the difference. CSFII Primary Dataset for Survey Foods code 13278 (beef, short loin, top sirloin, all grades, separable lean and fat, ¼" fat, cooked, broiled) was 57 percent higher in saturated fat and 56 percent higher in total fat than SR 16 NDB 13454 (beef, short loin, top sirloin, all grades, separable lean only 0" fat, cooked, broiled).

Using the "lean only" version not only better fulfills CNPP's established philosophical goal of flexibility and better ensures accurate nutrient profiles for determining the daily food intake patterns, it also fulfills CNPP's goals of being useful for consumers and being realistic in the development of a food guide that is based on commonly used foods.⁶ The vast majority of beef eaters trim beef cuts of visible fat before they eat. In a nationally representative survey of 950 consumers conducted by Ipsos-Reid in August 2003, 80 percent of beef eaters said they prefer the fat trimmed from beef before they eat.⁷ Moreover, 66 percent of beef steak eaters and 70 percent of beef roast eaters said they trim off all visible fat before eating. Thus, "lean only" more closely matches consumer behavior and is the leanest form of beef products.

Taken individually or collectively, using the most current data (SR 16) and/or the leanest form of beef products could have dramatic impact on CNPP's analysis of total fat, saturated fat and energy intakes from beef products. CNPP needs to use the updated SR 16 data as well as the data on the leanest form of beef product—namely "lean only"—to calculate the correct nutrient profile for the meat group and thus daily food patterns. CNPP also needs to disclose to the public its complete and exact methods, procedures and analyses to document all the steps inherent in calculating the nutrient profiles of the proposed daily food pattern before it finalizes the daily food patterns. Such documentation and disclosure is in the best interest of the public given the importance of the food guide in assisting consumers in building healthy diets.

NCBA recognizes that this is not a trivial undertaking. However, because CNPP announced that it is presently analyzing data from the 1999-2000 National Health and Nutritional Examination Survey (NHANES), released in August 2002 by the Department of Health and Human Services, to corroborate the adequacy of the proposed food intake patterns, NCBA believes that the request is not only timely, but the right thing to do in the public interest.⁸

CNPP expressed interest in receiving comments on specific issues and questions. The following are NCBA's comments on those questions.

1. Appropriateness of using *sedentary, reference-sized individuals* in assigning target calorie levels for assessing the nutritional adequacy and moderate of each food intake pattern.

NCBA believes that it is highly inappropriate and counter to the public health interest of the nation to use sedentary energy intake levels of individuals to determine the target calorie level for each food intake pattern. As multiple authoritative governmental and health organizations have declared, increasing the physical activity of the population is a clear public health priority. From *Healthy People 2010* to the IOM macro-ingredient report, to the Surgeon General's Report on Physical Activity, to the *2000 Dietary Guidelines for Americans*, the message has been clear

⁶ USDA's Food Guide: Background and Development, p. 6.

⁷ Ipsos-Reid U.S. Public Affairs research August 2003 (margin of error ±3.1)

⁸ 68FR53536-53539

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for individuals to be more active. In fact, the 2000 Dietary Guidelines specifically advises individuals to "Be physically active each day" and the IOM recommended that individuals adopt an active lifestyle to decrease the risk of chronic disease and to maintain ideal body weight.

To the extent that the Food Guide Pyramid is intended to help individuals put the Dietary Guidelines into practice, the reassessed food guide should incorporate physical activity goals similar to nutritional goals. In essence the food guide should show Americans how to achieve energy balance at various levels of activity, not just how few calories a sedentary person needs to achieve a nutritionally adequate diet.

CNPP stated it used the sedentary energy level because "...it does not require the assumption that a person needs to be active in order to meet nutrient needs," and "...it was considered better not to assume any specific level of physical activity." CNPP's use of the sedentary energy level does not help educate Americans on the more important dietary component—namely energy balance. A food guide that does not help teach consumers how to balance overall energy will not help to prevent overweight and obesity in the U.S. CNPP's rationale addresses the historical issue of adequacy for only one energy level, but not moderation. Using only the sedentary energy level without educating consumers on energy balance is likely to have the reverse effect that CNPP intends. Telling consumers they can get a nutritionally adequate diet if they're sedentary with fewer calories does nothing to promote increased activity and skills in appropriately balancing calories eaten with those expended. It also does not educate consumers on achieving a nutritionally adequate diet if they are more physically active.

CNPP states that it does plan to encourage physical activity in materials designed for consumers. However, this is a superficial approach to dealing with what is arguably the number one public health issue in the nation—reducing and preventing obesity. While it may require additional work and may be inconvenient for the government's schedule, CNPP should undertake appropriate consumer research through experimental design using principles of child and adult learning and behavior change to incorporate the concept of energy balance into the food guide. Alternatively, CNPP could consider developing daily food patterns at different activity levels or using the IOM recommended physical activity level of ≥ 1.6 and < 1.9 , which equates to walking at 4 miles/hour for 1 hour a day. In short, CNPP needs to incorporate physical activity and energy balance into the core components of the food guide.

2. Appropriateness of the *selection of nutritional goals for the daily food intake patterns.*

As noted above, NCBA believes CNPP should specifically include physical activity goals similar to nutritional goals in developing the daily food patterns.

3. Appropriateness of the proposed *food intake patterns for educating Americans about healthful eating patterns.*

NCBA believes that consumer education tools, such as the food guide, should be based on naturally nutrient rich foods, such as lean beef. In fact, given the public health epidemic of overweight and obesity it becomes even more important that consumers choose their calories by

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the company they keep – choosing naturally nutrient rich foods first with additional fats and added sugars as energy needs allow.

NCBA questions whether CNPP has sufficient knowledge and understanding of consumer eating behavior and preferences to determine the appropriateness of the proposed food intake patterns. In particular, CNPP does not provide any research or the results of any consumer testing to show that the proposed food intake patterns are useful, practical, and relevant to consumers today. Developing food patterns to meet nutritional goals and standards is an academic exercise unless CNPP also determines that the food patterns are attractive to consumers, can be successfully implemented by consumers and can be sufficiently flexible to accommodate wide variations in consumer preferences and needs.

It is our observation that when reassessing the Food Guide Pyramid, the primary issue of public health lies mainly in achieving consistent compliance with the Food Guide Pyramid. Yet, consumer compliance is inadequate. According to survey data, about 80 percent of adults recognize the Food Guide Pyramid as the cornerstone of a healthy diet. However, CNPP's own Healthy Eating Index report for 1999-2000 documented that only 10 percent of Americans had a "good" diet and that Americans' eating patterns had not changed from 1996 to 1999-2000.⁹ The issue of lack of compliance is seen clearly when looking at NHANES 3, NHANES 4 and CSFII 94-96 data which indicate that less than one percent of the population actually consumes the recommended number of servings from all food groups. CNPP needs to understand fully the basis of the gap between recommendation and compliance to understand best how to improve food guidance.

Furthermore, to have any possibility of having a measurable impact on public health, the food guide should be designed in a manner that consumers can and will want to adopt. While it is true the government has not promoted the food guide as it needs, no amount of promotion will compensate for inherently unacceptable, unpalatable, impractical food patterns. For example, CNPP notes that the proposed daily food intake patterns include higher levels of dark green vegetables, legumes and oils and soft margarines than the original Pyramid. Yet, CNPP does not provide any consumer data to show that these levels are feasible, practical or desirable. In regard to legumes, based on CSFII 94-96, 98 data, it is possible that CNPP is not being practical or realistic as it considers adding more legumes to the food pattern for the Food Guide Pyramid. According to CSFII, very few Americans currently eat meaningful levels of legumes. In fact, 74% do not have any in two days of intake. This is compared to meat (beef, pork, lamb) where only 17% of people consumed none during the same time frame. While NCBA believes increasing legume consumption is laudable, that increase has to be within reasonable attainment of consumers to be feasible and practical.

Furthermore, CNPP needs to address calorie equivalency as it develops the food intake patterns. Given the current concern over caloric intake relative to obesity, it is important to note that when comparing protein equivalence, meat provides significantly fewer calories than do legumes. In fact, it takes 1.7 times more calories to get the same amount of protein from legumes than from meat. According to SR 16 data, beef (using a ground beef composite) has 65 calories per ounce and legumes contain 119 calories per ½ cup, which is the same protein equivalent.

⁹ The Healthy Eating Index: 1999-2000. USDA, CNPP-12. Dec. 2002. p. 13.

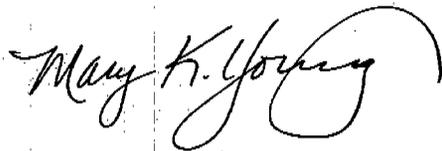
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4. Appropriateness of using "cups" and "ounces" vs. "servings" in consumer materials to suggest daily amounts to choose from each food group and subgroup.

NCBA believes that the answer to this question depends on the basis of more extensive consumer research than CNPP has conducted to date. Ultimately, improving the utility and practicality of the food guide will aid in its increased usage and application. Thus, it is important to understand consumer practice and behavior in designing the food guide. CNPP's qualitative Consumer Food Guide Pyramid Study provided insights into consumer thinking about servings and serving sizes. However, the study does not and cannot by its very design, show the fundamentally superior approach in consumer implementation. NCBA does support, however, the core concept of using common household measurements as a major line of inquiry in additional research.

NCBA appreciates the opportunity to provide comment on this very important consumer education tool.

Sincerely,



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APPENDIX I

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Nutrient Database (NDB) codes for ground beef and beef cuts in the Primary Dataset for survey foods, and the corresponding NDB in the Standard Nutrient Database, Release 16

NDB code	Description - all 3 ounces	calories	Fat (g)	Fat % decrease if use leanest	Sat. Fat (g)	Sat Fat % decrease if use leanest
GROUND BEEF						
13295	Beef, ground, extra lean, raw	199	14.511		5.793	
23557	Beef, ground, 95% lean, raw	116	4.250	70.7%	1.886	67.4%
13298	Beef, ground, extra lean, cooked, broiled, medium	218	13.880		5.257	
23558	Beef, ground, 95% lean, cooked, broiled	145	5.568	59.9%	2.614	52.1%
13299	Beef, ground, extra lean, cooked, broiled, well done	225	13.430		5.279	
23558	Beef, ground, 95% lean, broiled	145	5.568	58.5%	2.614	50.5%
13300	Beef, ground, extra lean, cooked, pan-fried, medium	217	13.957		5.489	
23559	Beef, ground, 95% lean, pan-broiled	139	5.049	63.8%	2.369	56.6%
13302	Beef, ground, lean, raw	225	17.580		7.068	
23557	Beef, ground, 95% lean, raw	116	4.250	75.8%	1.886	73.3%
13305	Beef, ground, lean, cooked, broiled, medium	231	15.691		6.162	
23558	Beef, ground, 95% lean, broiled	145	5.568	84.5%	2.614	87.6%
13306	Beef, ground, lean, cooked, broiled, well done	238	14.994		5.890	
23558	Beef, ground, 95% lean, broiled	145	5.568	62.9%	2.614	55.6%
13309	Beef, ground, regular, raw	264	22.581		9.168	
23557	Beef, ground, 95% lean, raw	116	4.250	81.2%	1.886	79.4%
13312	Beef, ground, regular, cooked, broiled, medium	240	16.702		6.562	
23558	Beef, ground, 95% lean, broiled	145	5.568	66.7%	2.614	60.2%
13313	Beef, ground, regular, cooked, broiled, well done	269	18.249		7.689	
23558	Beef, ground, 95% lean, broiled	145	5.568	68.6%	2.614	65.9%
13314	Beef, ground, regular, cooked, pan-fried, medium	n/a	n/a		n/a	
23559	Beef, ground, 95% lean, pan-broiled	139	5.049		2.369	n/a

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BEEF CUTS									
13004	Beef, composite of trimmed retail cuts, all grades, separable lean and fat, 1/4" fat, cooked	259	18,309	7,259	58.5%				
13364	Beef, composite of trimmed retail cuts, separable lean only, 0" trim, all grades, cooked	179	7,888	3,009	58.5%				
13012	Beef, composite of trimmed retail cuts, all grades, separable lean only, 1/4" fat, cooked	184	8,424	3,221	61.6%				
13064	Beef, composite of trimmed retail cuts, separable lean only, 0" trim, all grades, cooked	179	7,888	3,009	61.6%				
13022	Beef, retail cuts, brisket, whole, all grades, separable lean and fat, 1/4" fat, cooked, braised	327	26,826	10,523					
23595	Brisket, flat half, separable lean only, 1/8" trim, all grades, braised	167	5,103	1,935	81.6%				
13024	Beef, retail cuts, brisket, whole, all grades, separable lean only, 1/4" fat, cooked, braised	206	10,526	6,876	81.6%				
23596	Brisket, flat half, separable lean only, 1/8" trim, all grades, braised	167	5,103	1,935	81.6%				
13034	Beef, chuck, arm pot roast, all grades, separable lean and fat, 1/4" fat, cooked, braised	282	20,238	7,973					
13376	Chuck, arm pot roast, separable lean only, 0" trim, all grades, braised	179	6,460	2,346	70.6%				
13036	Beef, chuck, arm pot roast, choice, separable lean and fat, 1/4" fat, cooked, braised	296	21,918	8,666					
13377	Chuck, arm pot roast, choice, separable lean only, 0" trim, braised	180	6,820	2,498	71.4%				
13038	Beef, chuck, arm pot roast, select, separable lean and fat, 1/4" fat, cooked, braised	268	18,462	7,285					
13378	Chuck, arm pot roast, select, separable lean only, 0" trim, braised	166	4,930	1,865	74.4%				
13042	Beef, chuck, arm pot roast, all grades, separable lean only, 1/4" fat, cooked, braised	184	7,056	2,558					
13376	Chuck, arm pot roast, separable lean only, 0" trim, all grades, braised	179	6,460	2,346	83.9%				
13044	Beef, chuck, arm pot roast, choice, separable lean only, 1/4" fat, cooked, braised	191	7,905	2,865					
13377	Chuck, arm pot roast, choice, separable lean only, 0" trim, braised	180	6,520	2,468	13.9%				
13046	Beef, chuck, arm pot roast, select, separable lean only, 1/4" fat, cooked, braised	176	6,120	2,219					
13378	Chuck, arm pot roast, select, separable lean only, 0" trim, braised	166	4,930	1,865	16.9%				
13050	Beef, chuck, blade roast, all grades, separable lean and fat, 1/4" fat, cooked, braised	293	21,837	8,696					
13058	Beef, chuck, blade roast, all grades, separable lean only, 1/4" fat, cooked, braised	213	11,135	4,318	50.3%				
13052	Beef, chuck, blade roast, choice, separable lean and fat, 1/4" fat, cooked, braised	309	23,647	9,416					
13060	Beef, chuck, blade roast, choice, separable lean only, 1/4" fat, cooked, braised	224	12,240	4,743	49.8%				
13072	Beef, rib, whole (ribs 6-12), all grades, separable lean and fat, 1/4" fat, cooked, broiled	291	23,316	9,461					
13084	Beef, rib, whole (ribs 6-12), all grades, separable lean and fat, 0" fat, cooked, broiled	190	10,387	4,224	55.4%				
13110	Beef, rib, large end (ribs 6-9), all grades, separable lean and fat, 1/4" fat, roasted	310	25,604	10,209					
13116	Beef, rib, large end (ribs 6-9), all grades, separable lean only, 1/4" fat, cooked, broiled	201	11,220	4,479	66.1%				
13124	Beef, rib, small end (ribs 10-12), all grades, separable lean and fat, 1/4" fat, cooked, broiled	286	22,083	8,942					
13394	Beef, rib, small end (ribs 10-12), all grades, separable lean only, 0" fat, cooked, broiled	181	8,755	3,536	60.5%				

13y15
Young &
Wilkinson

13180	Beef, rib, small end (ribs 10-12), all grades, separable lean only, 1/4" fat, cooked, broiled	188	3,657.0	3,842	8.0%	3,836	8.0%
13181	Beef, rib, small end (ribs 10-12), all grades, separable lean only, 0" fat, cooked, broiled	181	3,755	3,536	8.0%	3,536	8.0%
13148	Beef, rib, short ribs, choice, separable lean and fat, cooked, braised	400	35,683	15,130		15,130	
13150	Beef, rib, short ribs, choice, separable lean only, cooked, braised	251	15,410	6,579	56.8%	6,579	56.5%
13182	Beef, round, top round, choice, separable lean and fat, 1/4" fat, cooked, broiled	204	11,577	4,386		4,386	
13146	Beef, round, top round, choice, separable lean only, 1/4" fat, cooked, broiled	162	6,218	2,776	46.3%	2,776	60.4%
13160	Beef, round, bottom round, all grades, separable lean and fat, 1/4" fat, cooked, braised	234	14,365	5,415		5,415	
13407	Beef, round, bottom round, all grades, separable lean only, 0" fat, cooked, braised	173	6,460	2,184	55.0%	2,184	59.7%
13192	Beef, round, bottom round, choice, separable lean and fat, 1/4" fat, cooked, braised	241	15,240	5,712		5,712	
23322	Beef, round, bottom round, choice, separable lean only, 1/8" fat, cooked, braised	194	7,671	2,843	49.7%	2,843	58.7%
13176	Beef, round, eye of round, all grades, separable lean and fat, 1/4" fat, cooked, roasted	195	10,838	4,233		4,233	
13418	Beef, round, eye of round, all grades, separable lean only, 0" fat, cooked, roasted	141	3,995	1,445	63.1%	1,445	65.9%
13184	Beef, round, eye of round, all grades, separable lean only, 1/4" fat, cooked, roasted	145	4,163	1,513		1,513	
13193	Beef, round, eye of round, all grades, separable lean only, 0" fat, cooked, roasted	141	3,995	1,445	41%	1,445	45%
13192	Beef, round, lip round, all grades, separable lean and fat, 1/4" fat, cooked, roasted	199	11,254	4,267		4,267	
13424	Beef, round, lip round, all grades, separable lean only, 0" fat, cooked, roasted	150	5,015	1,751	55.4%	1,751	59.0%
13194	Beef, round, lip round, choice, separable lean and fat, 1/4" fat, cooked, roasted	210	12,681	4,619		4,619	
13426	Beef, round, lip round, choice, separable lean only, 0" fat, cooked, roasted	150	5,157	1,945	56.8%	1,945	59.6%
13196	Beef, round, tip round, select, separable lean and fat, 1/4" fat, cooked, roasted	191	10,328	3,910		3,910	
13426	Beef, round, tip round, select, separable lean only, 0" fat, cooked, roasted	127	3,723	1,329	64.0%	1,329	66.0%
13200	Beef, round, lip round, all grades, separable lean only, 1/4" fat, cooked, roasted	157	5,865	2,049		2,049	
13424	Beef, round, lip round, all grades, separable lean only, 0" fat, cooked, roasted	150	5,015	1,751	14.5%	1,751	14.5%
13202	Beef, round, tip round, choice, separable lean only, 1/4" fat, cooked, roasted	160	6,205	2,167		2,167	
13425	Beef, round, tip round, choice, separable lean only, 0" fat, cooked, roasted	150	5,457	1,945	12.1%	1,945	10.2%
13204	Beef, round, lip round, select, separable lean only, 1/4" fat, cooked, roasted	153	5,440	1,904		1,904	
13426	Beef, round, lip round, select, separable lean only, 0" fat, cooked, roasted	127	3,723	1,329	31.6%	1,329	30.2%
13208	Beef, round, top round, all grades, separable lean and fat, 1/4" fat, cooked, broiled	184	8,177	3,077		3,077	
13217	Beef, round, top round, all grades, separable lean only, 1/4" fat, cooked, broiled	153	4,165	1,428	49.1%	1,428	53.6%
13211	Beef, round, top round, choice, separable lean and fat, cooked, panined, 1/4" fat	235	13,065	4,497		4,497	
13436	Beef, round, top round, choice, separable lean only, cooked, braised, 0" fat	176	21,930	11,692	62.3%	11,692	62.4%

14815
Yang & Wilkinsons

13220	Beef, round, top round, choice, separable lean only, 1/4" fat, cooked, pan-fried	193	7,293	32.4%	2,057	17.7%
13436	Beef, round, top round, choice, separable lean only, cooked, braised, 0" fat	176	4,930	32.4%	1,892	17.7%
13238	Beef, short loin, tenderloin, all grades, separable lean and fat, 1/4" fat, cooked, broiled	247	17,224	58.1%	6,758	55.3%
13442	Beef, short loin, tenderloin, all grades, separable lean only, 0" fat, cooked, broiled	175	8,075	58.1%	3,018	55.3%
13250	Beef, short loin, tenderloin, all grades, separable lean only, 1/4" fat, cooked, broiled	179	8,500	5.0%	3,179	5.1%
13442	Beef, short loin, tenderloin, all grades, separable lean only, 0" fat, cooked, broiled	175	8,075	5.0%	3,018	5.1%
13262	Beef, short loin, top sirloin, all grades, separable lean and fat, 1/4" fat, cooked, broiled	244	16,788	57.6%	6,647	59.1%
13448	Beef, short loin, top sirloin, all grades, separable lean only, 0" fat, cooked, broiled	168	7,140	57.6%	2,720	59.1%
13270	Beef, short loin, top loin, all grades, separable lean only, 1/4" fat, cooked, broiled	176	7,990	10.6%	3,051	10.8%
13448	Beef, short loin, top loin, all grades, separable lean only, 0" fat, cooked, broiled	168	7,140	10.6%	2,720	10.8%
13270	Beef, short loin, top sirloin, all grades, separable lean and fat, 1/4" fat, cooked, broiled	219	18,098	56.9%	6,219	56.8%
13454	Beef, short loin, top sirloin, all grades, separable lean only, 0" fat, cooked, broiled	162	5,780	56.9%	2,252	56.8%
13281	Beef, short loin, top sirloin, choice, separable lean and fat, 1/4" fat, cooked, pan-fried	277	19,414	52.0%	7,574	54.9%
13290	Beef, short loin, top sirloin, choice, separable lean only, 1/4" fat, cooked, pan-fried	202	9,325	52.0%	3,417	54.9%
13287	Beef, short loin, top sirloin, all grades, separable lean only, 1/4" fat, cooked, broiled	166	6,120	5.6%	2,252	5.4%
13454	Beef, short loin, top sirloin, all grades, separable lean only, 0" fat, cooked, broiled	162	5,780	5.6%	2,252	5.4%
13289	Beef, short loin, top sirloin, choice, separable lean only, 1/4" fat, cooked, broiled	172	6,800	18.1%	2,643	19.8%
13455	Beef, short loin, top sirloin, choice, separable lean only, 0" fat, cooked, broiled	160	5,567	18.1%	2,121	19.8%
13292	Beef, short loin, top sirloin, select, separable lean only, 1/4" fat, cooked, broiled	158	6,270	15.9%	2,049	20.5%
13450	Beef, short loin, top sirloin, select, separable lean only, 0" fat, cooked, broiled	150	4,270	15.9%	1,628	20.5%
13361	Beef, composite of trimmed retail cuts, all grades, separable lean and fat, 0" fat	232	14,764	46.6%	5,822	48.3%
13364	Beef, composite of trimmed retail cuts, all grades, separable lean only, 0" fat, cooked, braised	179	7,888	46.6%	3,009	48.3%
13367	Beef, retail cuts, brisket, whole, all grades, separable lean and fat, 0" fat, cooked, braised	247	16,592	46.4%	6,401	51.6%
13368	Beef, retail cuts, brisket, whole, all grades, separable lean only, 0" fat, cooked, braised	185	8,568	46.4%	3,086	51.6%
13373	Beef, chuck, arm pot roast, all grades, separable lean and fat, 0" fat, cooked, braised	238	14,459	55.3%	5,627	58.3%
13376	Beef, chuck, arm pot roast, all grades, separable lean only, 0" fat, cooked, braised	179	6,460	55.3%	2,346	58.3%
13379	Beef, chuck, blade roast, all grades, separable lean and fat, 0" fat, cooked, braised	284	20,579	44.9%	8,752	46.2%
13382	Beef, chuck, blade roast, all grades, separable lean only, 0" fat, cooked, braised	216	14,305	44.9%	4,386	46.2%
13385	Beef, rib, large end (ribs 6-9), all grades, separable lean and fat, 0" fat, roasted	300	23,970	52.5%	9,664	52.9%
13388	Beef, rib, large end (ribs 6-9), all grades, separable lean only, 0" fat, roasted	202	11,390	52.5%	4,547	52.9%

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Yang &
Wilkinson

13391	Beef, rib, small end (ribs 10-12), all grades, separable lean and fat, 0" fat, cooked, broiled	252	17,944	7,269	51.2%	31.3%
13394	Beef, rib, small end (ribs 10-12), all grades, separable lean only, 0" fat, cooked, broiled	181	8,735	2,618	14.1%	16.6%
13398	Beef, round, bottom round, all grades, separable lean and fat, 0" fat, cooked, braised	173	6,460	1,674	12.3%	13.7%
13407	Beef, round, bottom round, all grades, separable lean only, 0" fat, cooked, braised	145	4,556	1,475	6.55	2.431
13415	Beef, round, eye of round, all grades, separable lean and fat, 0" fat, cooked, broasted	211	9,715	3,672	24.6%	28.0%
13418	Beef, round, eye of round, all grades, separable lean only, 0" fat, cooked, broasted	169	4,250	1,462	56.3%	60.2%
13421	Beef, round, tip round, all grades, separable lean and fat, 0" fat, cooked, roasted	178	5,364	1,913	20.8%	23.6%
13424	Beef, round, tip round, all grades, separable lean only, 0" fat, cooked, roasted	169	4,250	1,462	10.7%	10.7%
13427	Beef, round, top round, all grades, separable lean and fat, 1/4" fat, cooked, braised	174	4,780	1,632	4.293	3.018
13430	Beef, round, top round, all grades, separable lean only, 1/4" fat, cooked, braised	169	4,230	1,462	27.8%	29.7%
13434	Beef, tenderloin, all grades, separable lean and fat, 0" fat, cooked, broiled	200	11,178	4,293	18.1%	19.2%
13442	Beef, tenderloin, all grades, separable lean only, 0" fat, cooked, broiled	175	8,075	3,018	3.349	3.349
13445	Beef, top loin, all grades, separable lean and fat, 0" fat, cooked, broiled	160	5,221	1,936	31.9%	32.8%
13448	Beef, top loin, all grades, separable lean only, 0" fat, cooked, broiled	168	7,140	2,720		
13451	Beef, short loin, top sirloin, all grades, separable lean and fat, 0" fat, cooked, broiled	183	8,483	3,349		
13454	Beef, short loin, top sirloin, all grades, separable lean only, 0" fat, cooked, broiled	162	5,780	2,252		

10/21/03 Parnell

SCHOOL FOOD & NUTRITION SERVICES
OF NEW ORLEANS, INC.

received
10/21/03

KIT

October 24, 2003

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

To Whom It May Concern:

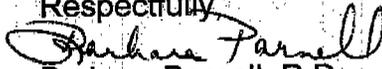
I am writing in response to the proposed changes to the Food Guide Pyramid. Although not perfect, the current Food Guide Pyramid has been helpful for educating students and consumers in making healthier food choices. Therefore, the revised version should not be too complicated so that it remains easy to follow by the general public.

Specific recommendations regarding the Food Guide Pyramid are as follows:

1. The Food Guide Pyramid, Nutrition Facts Labels and the Dietary Guidelines for Americans should complement each other using the same terminology and serving sizes.
2. Serving sizes for foods should be stated in specific volume or weight measures rather than the broader term of one serving.
3. It should be stressed that a standard portion does not compare to what the average American typically consumes, especially that offered by the fast food industry.

Thank you for your efforts.

Respectfully,


Barbara Parnell, R.D.
Nutrition Coordinator

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received
10/21/03
KW

October 24, 2003

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

Dear Sir or Madam:

We are writing to you in support of a letter sent to you by Ms. Mary Palmer-Sullivan, The Executive Director of the National Barley Foods Council concerning the inclusion of barley in revised Food Guide Pyramid.

We have been actively working with food barley for over 20 years and are ardent believers and supporters of this grain for its nutrition and health benefits. As researchers at Montana State University we published numerous articles showing the positive benefits of barley when it is included in the diet. Food barley is not a new unproven ingredient for the human diet. It is unfortunate that this grain has been significantly ignored in recent years by the major actors in the American cereal industry and relegated mostly to "barley soups". There are many ways that barley can be utilized other than in soup.

As pointed out to you in the letter from Ms. Palmer-Sullivan, barley is an excellent source of soluble dietary fiber, especially B-glucans, which has been proven with oats and barley alike, to be effective in lowering blood cholesterol and leveling off glucose and insulin spikes in diabetic patients. Barley needs a chance to become an accepted cereal in the food industry for the benefit of the consuming public. This will not only provide an alternative grain of known health benefits for consumers, but will help American barley farmers by providing an additional market for their product.

Sincerely,



C.W. Newman Ph. D., FASAS
R.K. Newman, Ph.D., RD, CDE, FADA
Professor Emeritus, Montana State University

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NORTH DAKOTA
DEPARTMENT OF HEALTH

received
10/24/03

COMMUNITY HEALTH SECTION KT

October 23, 2003

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

199' Northrup

Oct 24, 2003

received
10/24/03
KT

Dear USDA Reassessment Team,

I have been reading about diet for a number of years and have come to be persuaded by the work of Center for Science in the Public Interest, Marion Nestle (Politics of Food), and Walter Willett (Eat, Drink, and Be Healthy). In terms of your particular task, please consider moving toward the improvements suggested by Willett, especially to recommend that we only sparingly eat red meat, butter, white rice, white bread, white potatoes + pasta, and sweets. It is hard to imagine that you (who are on this ^{team}) don't know this to be the best advice that you can offer the public, but I appreciate the difficult politics of your task. Please push as effectively as you can for modifying the pyramid to conform to our best science-based information.

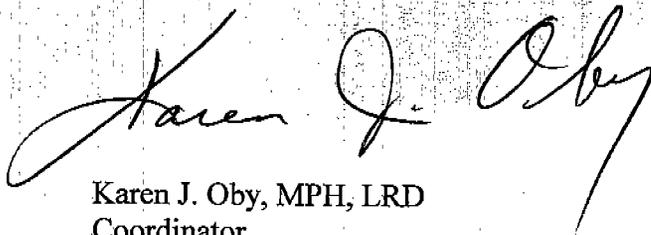
Good luck! Eric Northrup

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We commend the increased emphasis on whole grains. This is an area that needs more emphasis. By increasing emphasis in the Food Guide Pyramid, more whole-grain options will be offered in supermarkets and restaurants. Think of how fast-food chains could help increase the fiber intake of this country, if they just offered a bun that was one-third whole-wheat.

CNPP mentioned in the notice that physical activity will be encouraged in the Food Guide Pyramid consumer materials. We recommend that the CNPP consider including guidance on other positive behaviors that provide for better nutrition and social interaction in our society, such as promoting family meals; eating regular meals and snacks throughout the day and turning off the TV at mealtimes. There should be a section on infant/toddler feeding that promotes breastfeeding and offers other feeding suggestions such as attention to hunger/fullness cues when feeding young infant and toddlers and the inappropriateness of using food as a reward for good behavior.

Sincerely,



Karen J. Oby, MPH, LRD
Coordinator
North Dakota Healthy Weight Council

10/21
Sloan

received
10/27/03
KT

October 23, 2003

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

Dear Mr. Hentges:

As a registered dietitian and consultant to the California Walnut Commission, I am writing in regard to the Proposed Daily Food Intake Patterns for Food Guide Pyramid. As the government modifies the food guide pyramid, I am pleased that the revisions suggest daily intake amounts of essential alpha-linolenic acid (ALA), however food sources noted of this essential fatty acid are misleading and incomplete. I realize that the main food sources of ALA in the American diet based on national surveys, are canola oils and soft margarines, however as American consumers begin to think about changing their personal dietary choices, they may want to know more about walnuts. Walnuts are unique as one of the only whole food sources of ALA – often thought, to be only in canola oil and canola based soft margarines. In addition, walnuts are also lower in calories and saturated fat than canola oil, plus offer protein, fiber and other nutrients. Recently, the Food and Drug Administration (FDA) affirmed the health claim, "Supportive but not conclusive research shows that eating 1.5 ounces per day of walnuts as part of a diet low in saturated fat and cholesterol may reduce the risk of heart disease. See nutrition information for fat content." This FDA decision comes in response to a petition filed by the California Walnut Commission, which highlights a body of international scientific research substantiating the specific benefit of consuming walnuts as part of a heart healthy diet in reducing the risk of heart disease. The body of evidence suggests that the nutritional composition of walnuts contribute to these heart health benefits.

Clearly, further steps need to be taken to place greater emphasis on utilizing walnuts as a rich source of ALA, as well as polyunsaturated fat. I hope the USDA will join the U.S. Food and Drug Administration, the Food Nutrition Board of the National Academy of Sciences and other recognized agencies such as the American Heart Association in acknowledging the health benefits derived from the ALA in walnuts as they make their revisions to the Food Guide Pyramid.

Thank you for your consideration.

Sincerely,


Carol Berg Sloan RD

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Taylor &
Stewart

THE
TAYLOR-HIGH
Center for Preventive Medicine **CLINIC**

received
10/21/03
KT

October 24, 2003

U.S.D.A. Center for Nutrition
Policy and Promotion
3101 Park Center Drive
Room #1034
Alexandria, VA 22302

Dear Members:

The Taylor-High Center for preventive medicine is a preventative medicine specialty clinic that specializes in the reduction of heart disease, diabetes, and high blood pressure. The majority of the clinic's patients are treated for both primary and secondary outcome from these illnesses. We see a substantial amount of obesity as well. As health care professionals with 30 years of combined experience we believe that nutrition and exercise are the cornerstones to achieving a healthy society. If the food guide pyramid is to be used as an educational tool for Americans then it should promote a plant-based whole food diet. It should also strongly advocate daily exercise.

The present food guide pyramid needs revision primarily in two categories, bread, cereal, rices, and fats, oils and sweets. If one simply looks at today's pyramid it would allow potentially for excessive amounts of starches to be served to populations who could be at extreme risk for developing a disease. For example, Native American Indians when using today's pyramid could consume 11 servings of white bread and sugar-coated cereals. This is a population that is at high risk for developing diabetes, and is essentially being recommended a food group that we may very well find out in the future is linked to increasing the likelihood of developing this particular illness. The U.S.D.A. Center for Nutrition Policy and Promotion should not encourage the already high rate of diabetes in any population but especially in the Native American population.

Another recommendation in the pyramid is that fats and oils should be used sparingly. As more and more information becomes available about fats it is clear that there are both good fats and bad fats. While we are discovering that saturated fats tend to be harmful and unsaturated fats tend to be helpful, the pyramid does not address this in its current structure. Every American should have a healthy amount of monounsaturated fat in their diet which should comprise of three generous servings a day. Omega-3 fish oils are just one example of a healthy fat that should be incorporated into a person's diet on a regular basis. The healing and nutritional benefits of omega-3s are well-documented throughout the medical literature.

The problem with today's nutritional debate is that it is clouded with faulty and sometimes dubious research. We feel that research needs to be evidence-based, well-constructed, and thoroughly peer reviewed to have merit. We look toward studies such as the Framingham Heart Study and the Nurses Healthcare Study to support our conclusions for developing a healthier framework for nutrition. Walter Willett, M.D. is a well-respected and well-published author in the nutritional field. He has testified before the U.S.D.A. Senate for Nutrition Policy on research that promotes plant-based full foods and unsaturated fats as the cornerstone of dietary changes. Dr. Willett's research outlines the dangers of only certain carbohydrates and does not condemn the entire category of carbohydrates. We support Dr. Willett's proposal for a change in the U.S.D.A. pyramid, and we support his particular model for that change.

292
Taylor &
Stewart

Dr. Willett's evidence-based and sound approach in changes in the nutritional pyramid represents today's best medical advice regarding diet and its impact on overall health.

If there was one area of the pyramid that we would like to emphasize it would be the inclusion of exercise on a daily basis. Americans are more sedentary and more overweight than ever before, and these two facts are not coincidental. Any consistent message regarding health and nutrition must have a message regarding exercise given in tandem as well.

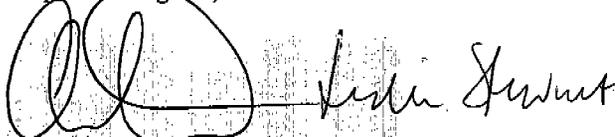
Our country will soon experience an additional financial hardship when the baby boomers hit Medicare age. This baby-booming population is currently far too heavy, far too sedentary, and at high risk for the development of diabetes, heart disease, and numerous other medical complications. Pharmaceuticals can only help prevent a small number of future medical events in a medication managed population.

Health care and healthy advice will have to revolve around nutrition and exercise in order to achieve the kind of goals for reduction in heart disease, high blood pressure, diabetes, and cancer that America should strive for. Nutrition and exercise can change not only the country's health, but also the country's economy. The U.S.D.A. Center for Nutrition Policy and Promotion has an obligation to promote a food-based model on a pure reviewed evidence-based medicine.

We appreciate your thoughtful consideration on this important nutritional topic. We realize that there will be many pressures from various industries upon the committee as it develops a new pyramid. We would urge the committee to follow the advice of independent researchers and their well-published medical trials such as Dr. Walter Willett's. We believe it could be easy to be bogged down in research provided by these various industries which clearly have an agenda which may be at odds with achieving optimal health for the American population. Please consider the design of the study and the conductor of the study when viewing any research that may impact your decision on the future pyramid.

In summary, we see preventable disease on a daily basis. We are treating this disease aggressively with medication, and have been woefully disappointed in our inability to stop this runaway health care crisis. Over the years our clinic has gone back towards nutrition and exercise as the cornerstones of health. We have been very pleased with the overall improvement of our healthy population when patients are given the information and direction to provide optimal health. We strongly advocate the revision of the pyramid, and we wholly endorse Dr. Walter Willett's model as a beginning.

Kindest personal regards,



Charles H. Taylor, M.D.
Leslie Stewart, RD, LD

CHT/ITS/46/3404

10/21/03
Heffel

received
10/21/03
KT

To Whom It May Concern,

I read through the changes being made to the Food Guide Pyramid and I am very impressed. The tables used are a great tool for professionals to refer to because they are very informative dealing with all ages and many caloric and energy needs. By working as a nutritionist I am able to use these tables as a reference and feel comfortable doing so. However, I feel that the general public would have a hard time understanding these tables and would use them incorrectly. When working as a Nutritionist for a local health agency, I learned as an educator the need to educate clients on how to use the Food Guide Pyramid properly. Therefore my recommendation would be to put a teaching module together with all the new information about the Food Guide Pyramid and distribute it to educators. This way the general public can learn how to use these tables in an effective way through a class or counseling.

The Food Guide Pyramid design listing serving sizes along with the food groups still needs work. It lists a wide range of servings, especially for the bread and cereal group. I would recommend listing the serving amounts according to activity levels.

I did want to mention that the Food Guide Pyramid for young children is wonderful. Not only is it easy to understand, but also is appealing and gets your attention.

Thank you for you time.

Sincerely,

Carrie Heffel



USA DRY PEA & LENTIL COUNCIL

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received
10/27/03
KT

23 October 2003

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

RE: Food Guide Pyramid revisions

Dear Gentilepersons:

We were pleased to learn that revisions are being considered for the Food Guide Pyramid. As the organization that represents the growers and processors of USA dry peas, lentils and chickpeas, we have commented many times in the past on the inappropriate placement of legumes in the Food Guide Pyramid meat/poultry/fish category, as the Guide currently designed. The placement of legumes with meat/poultry/fish is misleading, since the daily target for this category of 2-3 servings is clearly aimed at limiting the intake of fat and cholesterol. While the protein content of legumes might initially suggest a grouping with meat/poultry/fish, the more appropriate grouping for legumes would be with vegetables, since legumes are similar in a number of ways: low in calories, no cholesterol or saturated fat, very low in fat, and high in fiber. Given the benefits of legumes – high in protein, complex carbohydrates, and folate – we think it is clear that legumes should be put into the vegetable category, in order to encourage more people to consume healthy, low fat foods that provide great nutritional benefits. In fact, leaving legumes in the meat/poultry/fish category does a great disservice to those people who are cutting down on saturated fats by reducing meat intake – their best alternative source of protein is lumped in with meat in the guidelines, instead of in another category, which could help emphasize their suitability as part of a healthy, low-fat daily diet.

You are already aware of the Mediterranean Food Pyramid; in fact, the USDA website links to the Oldways Mediterranean Food Pyramid page at www.nal.usda.gov/fnic/etext/000023.html. The 'Mediterranean' approach mirrors our own view that legumes should be part of the normal daily diet, while foods high in saturated fat and cholesterol should be consumed more sparingly. If legumes are moved in the Food Guide Pyramid from the current meat/poultry/fish category to the vegetable category (or if a separate legumes category is created, as is done in the Mediterranean guide), with a recommendation for the category that would encourage 3 to 5 servings per day, we think the Food Guide Pyramid would better reflect the role of legumes in a healthy diet. Please feel free to contact us if you have any questions or comments, or if you would like any further information on peas, lentils and chickpeas. Thank you for your consideration of our request.

Regards,

Peter Klaiber
Director of Marketing

received
10/21/03



10/21/03 Olson

IDAHO BARLEY COMMISSION

October 24, 2003

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 Idaho Barley Commission would like to submit a comment on the proposed revisions to the daily food intake patterns that serve as the technical basis for the Food Guide Pyramid, regarding Issue No. 3 (the appropriateness of the proposed food intake patterns for educating Americans about healthful eating patterns –FR 68(176):53539).

We would encourage the inclusion of barley in the actual diagrams of the Food Guide Pyramid and in the footnotes that describe whole grains. Barley is high in total dietary fiber and has been recommended by the USDA Dietary Guidelines for Americans as an excellent means to increase whole grains in one's diet.

Human consumption of barley is diminutive compared to other cereal grains, but through consumer education on the nutritional benefits of barley we hope to increase consumption within the U.S.

The role of the Food Guide Pyramid is to be an educational tool for a balanced diet and we believe it is important to include barley as an example serving.

Thank you for your consideration.

Sincerely,


Kelly Olson
Administrator

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Pohl

received
10/27/03
KT

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

Dear FDP Reassessment Team Members:

Thank you for this opportunity to provide comments on revisions to the USDA nutrition education tool.

The Food Guide Pyramid was developed in 1992 and is clearly recognizable to many Americans. The nutrition messages promoted by the Food Guide Pyramid are intended to promote health through eating a variety of foods. The graphic strategically places the food groups to demonstrate proportionality. For example, a larger part of the diet should come from breads and cereals than milk and dairy products. The notoriety of the Food Guide Pyramid is demonstrated by the fact that it has been adapted to many different diets and philosophies by other organizations. Recent pressure has led to an effort to revise the FGP to be consistent with current science and to curb the obesity epidemic.

Critics of the FGP appear to want this allegedly simple graphic to be all things to all people. It is a momentous undertaking. Given the complexity of the field of nutrition, the varying needs of different population groups and conflicting philosophies of nutrition, it appears to be an impossible task. My sympathies are with the group charged with this effort.

If simple solutions are being pursued, these suggestions will prevail. They have been suggested by many others as well.

- Portray foods as servings rather than whole foods.
- Move cakes, cookies & pies from the breads & cereals group to the "other" food category
- Provide actual graphics of foods in the "other" category
- Differentiate between monounsaturated, saturated and unsaturated fats.
- Differentiate between complex carbohydrates, whole grains and enriched grains.
- Add water to the bottom of the pyramid - this is the most important nutrient.
- Identify goods that are excellent sources of fiber

Some experts want the FGP to promote physical activity. If this were done, it would no longer be a Food Guide Pyramid. It would have a different purpose and should be labeled as such. If the intent is to show the relationship of physical activity to food intake

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in maintaining weight – the activity message should be outside of the actual pyramid (or plate). One suggestion would be to demonstrate this with a balance:



Activity pyramids have been developed. The activity pyramid should demonstrate that some energy expenditure is basal, some comes from daily activities (such as walking to work and doing housework) and some is intentional exercise.

The Five A Day the Color Way materials are wonderful. If this could be incorporated into the FGP it would provide more support for variety in the diet.

I am in agreement with those who feel that a new image would better convey the intent of the FGP. I would like to propose that we reconsider the plate as the basis for the nutrition education symbol used by USDA.

- The circle is a symbol of wholeness and unity.
- The circle, which preceded the pyramid, demonstrated how the functions of some foods overlapped (i.e., beans and legumes were placed between fruits and vegetables and meat).
- The space inside the pyramid is more confining than that inside the circle. Foods are not as recognizable due to the limitations on space.
- The FGP has been presented in many different forms by many different groups and this may make it difficult for individuals to distinguish between the USDA developed tool and alternatives.

The pyramid is a symbol from an ancient culture. It is associated with death and burial and mysterious practices that have been lost to modern society. Food is needed to nourish the body and required to reach wholeness. Food is eaten for health and well-being, to support growth, and has social, cultural and emotional connotations. Food intake can be guided by knowledge but it is also guided by a biologically intuitive function. The FGP is a totally knowledge based system that does not acknowledge the intuitive, life affirming aspects of food.

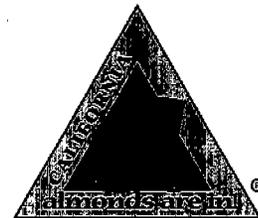
The current FGP has also been criticized for creating the obesity epidemic. This is a ludicrous idea. This would be an overestimate of the influence and educational value of the FGP.

Sincerely,

Susan A. Pohl, M.S., R.D.

1992
K. Lapsley

received
10/21/03



Almond Board of California

October 23, 2003

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

RE: Public Comments on the Food Guide Pyramid

I am writing in response to the USDA's report, *Food Guide Pyramid Daily Food Intake Patterns and Technical Support Data*, and specifically would like to provide comment on the *Nutrition Goal for Vitamin E*. As you are aware, approximately half of Americans are not meeting the current recommendations for vitamin E. In fact, according to CSFII data, Americans consume only about half of the recommended 15 mg of alpha-tocopherol per day.

The Food Guide Pyramid and Dietary Guidelines should be designed to help consumers reach the RDA for alpha-tocopherol vitamin E. Extensive research on vitamin E supports the DRI for the alpha-tocopherol form of vitamin E and suggests that alpha-tocopherol from food sources is the form best used in the body. The National Academy of Sciences has reviewed the body of research on vitamin E and supports these findings. In their 2000 report, the NAS quantified its recommendations for vitamin E in terms of alpha-tocopherol. Moreover, the NAS report does not support the use of high dose dietary supplements, and determined that the DRI for vitamin E can be met through a food first strategy.

Consumers can easily execute this food first strategy and incorporate alpha-tocopherol into the diet when making appropriate food choices. Almonds, for instance, are an excellent source of the alpha-tocopherol form of vitamin E. Eating one ounce of almonds (about a handful, or 23 almonds) provides 7.3 mg of alpha-tocopherol form of vitamin E. In the USDA report, the use of oils is noted to help consumers obtain the recommended amounts of vitamin E. However, research indicates that almonds are a superior source to commonly consumed oils, such as soybean oil. Soybean oil is the most commonly consumed oil (because of the popularity in its use among processed and fried foods), but it only provides a small amount of vitamin E. On a calorie-per-calorie basis, one ounce of almonds – 164 calories – delivers more alpha-tocopherol form of vitamin E than soybean oil. One hundred sixty-four calories in a one-ounce serving of almonds delivers 7.3 mg of alpha-tocopherol. One hundred sixty-four calories of soybean oil (equivalent to 1-1/3 tablespoons) only provides 2 mg of alpha-tocopherol.

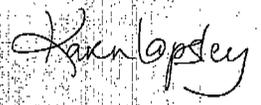
In addition to offering vitamin E, a one-ounce serving of almonds also provides protein, dietary fiber, vitamin B6, zinc, magnesium, copper, calcium, phosphorus and monounsaturated fat. Recent research also links almond consumption to heart health. Per capita consumption of tree nuts, such as almonds, continues to increase, reflecting consumer awareness of the important nutrients found in almonds—like vitamin E. The Food Guide

2007 K. Lapsley

Pyramid and Dietary Guidelines should also reflect this trend, and encourage consumers to choose nutrient-dense foods that will help them meet their vitamin E goal.

Thank you for your consideration of these comments.

Sincerely,



Karen Lapsley, DSc
Director, Scientific Affairs
Almond Board of California



STATE OF NEW YORK DEPARTMENT OF HEALTH

October 22, 2003

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

Dear Sir or Madam:

Thank you for the opportunity to provide comments on the proposed revisions to the daily food intake patterns that serve as the technical basis for the Food Guide Pyramid. As Director of the Hunger Prevention and Nutrition Assistance Program, a program that provides funding and technical assistance to the emergency food network in NYS, I would like to submit the following comments:

- Overall, the nutritional goals for the proposed daily food intake patterns are appropriate for professional use. The important issue is that these goals be communicated in language that people will understand. If foods that are high in desired nutrients are given the most emphasis, the message that they are contributors to a more healthful diet will come across.
- The nutritional goal of 1000 calories per day for children aged 1 to 3 years old and the limit of less than 10% of total calories from saturated fat daily appears to contradict the recommendation that children from 1 to age 2 be given whole milk. Being that whole milk provides approximately 50 saturated fat calories per cup and that one and a half to two cups of milk per day are recommended for this age group, this nutritional goal allows for little to no other sources of saturated fat in the diet of a 1 to 2 year old child.
- The nutritional goals do not take into consideration the nutrient vitamin D, which can be a nutrient of concern for our increasing population of older Americans. Although, the milk or calcium-rich food group includes vitamin D fortified fluid milk, the other calcium-rich dairy foods in this group are not fortified with vitamin D. Therefore, consumer educational materials need to stress the fact that for older Americans to meet their vitamin D requirements, their intake of calcium rich foods should include fluid milk.

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Clarke

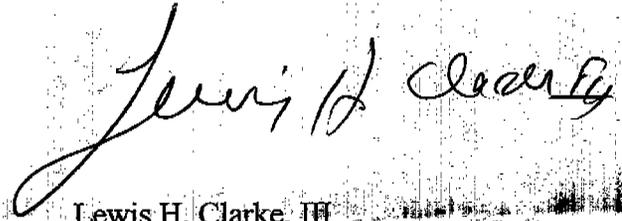
- The proposed daily food intake patterns are appropriate for educating Americans about a healthful diet. The increased amounts of whole grains, dark-green leafy vegetables, legumes and fruits are consistent with chronic disease prevention. The translation of these food intake patterns to Americans is critical. Emphasis should be on low-fat, nutrient dense foods that are minimally processed, as these foods are higher in fiber, lower in added sugars and higher in nutritional value. As director of a program which provides funds to purchase foods to enhance foods donated by food manufacturers and producers, most of which is highly processed food, such an emphasis on nutrient dense foods that are minimally processed, would support our work to improve the nutritional quality of food provided to food insecure individuals and families.
- The labeling of each food group should be considered part of the education on healthful eating. With that in mind, we would recommend that the names of the food groups be more nutrient-based (e.g. Protein-Rich Foods Group, Calcium-Rich Foods Group, etc.) The labels "additional fats" and "added sugars" may be misleading in that consumers may feel they should be added to achieve a healthful diet.
- We recommend the use of cups and ounces, rather than "servings" to suggest daily amounts from each food group. There is tremendous confusion between "serving" and "portion." When cups or ounces are not appropriate, portion sizes should be related to common object sizes, such as the palm of a hand or deck of cards.
- Consumer materials should be focused on balance and variety with special focus to the extreme demands for the best food choices during times of growth (childhood and pregnancy) and as we age. Specific recommendations for consumer materials include:
 - A separate Food Guide Pyramid for children and for older Americans.
 - Pictures of foods used in consumer materials should represent recommended portion sizes.
 - Fats and oils, and sweets should be separated into two groups.
 - Include some reference to trans fats in the fats and oils groups to reflect new labeling requirements.
 - There should be a clear understanding that the range of number of servings is based on age, gender, and physical activity level.
- When looking at Table 2 and Table 3 there are three distinct calorie levels that become apparent within a 600 calorie range determination:
 - Level 1 – Children 2-8 = 1000-1600 calories
 - Level 2 – All females and older Americans (>50) = 1600 – 2200 calories
 - Level 3 – Males 14-50

These three levels could be subsets of the food patterns for developing consumer materials.

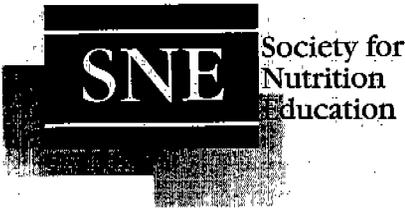
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Clarke

Meeting the dietary needs of Americans is clearly a challenge. With the rise in obesity in all age groups we must strive to shift the current eating and physical activity patterns contributing to this rise. We appreciate the opportunity to contribute to this process and anxiously await the final product.

Sincerely,



Lewis H. Clarke, III
Director
Hunger Prevention and Nutrition
Assistance Program



received
10/24/03
KT

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Voichick
Crockett

October 24, 2003

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 Society for Nutrition Education (SNE) welcomes the opportunity to provide comment and share insights with the U.S. Department of Agriculture's Center for Nutrition Policy and Promotion (CNPP) on the proposed revisions to the daily food intake patterns that serve as the technical basis for the Food Guide Pyramid.

SNE represents the unique professional interests of nutrition educators across the United States and is strategically poised to work with USDA in the revision of the Food Guide Pyramid as the premier educational tool for educating consumers. Our organization is dedicated to promoting healthy, sustainable food choices and has a vision of healthy people in healthy communities. SNE members fulfill this mission through research, innovative nutrition education, and communication for the public, professionals, and policy makers. In addition, SNE publishes the *Journal of Nutrition Education and Behavior*, the premier juried research periodical solely devoted to behavioral nutrition, research, and policy.

SNE is responding to CNPP's request for comments published in the Federal Register on September 10, 2003. Enclosed, please find our comments

Sincerely,

Jane Voichick, PhD
President

Elizabeth Crockett, PhD, RD, CDN
President-Elect

Enclosure

SNE

Society for
Nutrition
Education

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Voichick
&
Crockett

**Formal Comments of
The Society for Nutrition Education**

**To the
Food Guide Pyramid Reassessment Team
Center for Nutrition Policy and Promotion
U.S. Department of Agriculture**

**Concerning
Food Guide Pyramid, Daily Food Intake Patterns**

October 24, 2003

37910
Vicki Chick & Crockett

SOCIETY FOR NUTRITION EDUCATION
Statement about the Proposed Revision of the
USDA Food Guide Pyramid
October 2003

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The Society for Nutrition Education (SNE) welcomes the opportunity to provide comment and share insights with the US Department of Agriculture's Center for Nutrition Policy and Promotion (CNPP) on the proposed revisions to the daily food intake patterns that serve as the technical basis for the Food Guide Pyramid. SNE represents the unique professional interests of nutrition educators across the United States and is strategically poised to work with USDA in the revision of the Food Guide Pyramid as the premier educational tool for educating consumers. Our organization is dedicated to promoting healthy, sustainable food choices and has a vision of healthy people in healthy communities. SNE members operationalize this mission through research, innovative nutrition education, and communication for the public, professionals, and policy makers. In addition, SNE publishes the *Journal of Nutrition Education and Behavior*, the premier juried research periodical solely devoted to behavioral nutrition, research, and policy.

SNE is responding to CNPP's request for comments published in the Federal Register on September 10, 2003:

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CNPP is requesting comments on the proposed daily food intake patterns and the supporting technical data for the Food Guide Pyramid. CNPP is asking for comments on the adequacy, methodology, and use of the data... Proposed food intake patterns and summary of comments received in response to this notice will be presented to and discussed with the 2005 Dietary Guidelines Advisory Committee before the patterns are finalized...(1).

SNE's comments are based on the currently available data on food intake patterns and the Society's unique professional expertise. The following areas are addressed in this document:

- Using sedentary, reference-sized individuals in assigning target caloric levels
- Selection of nutritional goals
- Proposed food intake patterns
- Specifying commonly used food measures instead of "servings" in the Pyramid

1. Appropriateness of using sedentary, reference-sized individuals in assigning target caloric levels.

Rather than use of a confusing set of sedentary, reference sized individuals in assigning target caloric levels, SNE would like to see any changes made to be consistent with the kcal recommendations from current food information sources. SNE encourages the Committee to consider using the 2000 kcal standard used in nutrition labeling or the simple ranges used in the current Dietary Guidelines, i.e., indicate three recommended ranges based on indicated appropriate kcal recommendations that are based on gender, activity level and age.

2. Appropriateness of the selection of nutritional goals.

SNE maintains that by using the RDA or Adequate Intake (AI) set by the IOM in recent Dietary Reference Intake reports, CNPP is using the appropriate source of information. The goal to have an intake of key nutrients within the RDA or AI range, but less than the upper tolerable intake level, is appropriate.

One micronutrient (Vitamin E) and one macronutrient (carbohydrate, specifically sugar) deserve special attention. While SNE understands the caution of CNPP regarding a greatly increased RDA for vitamin E compared to previous standards, the actual level recommended in the 2,000 kcal pattern is only 55 percent of the recommendation (with the range from 44 percent to 81 percent in the patterns calculated for adults). If the pattern to be used is to be scaled downward, then the Vitamin E levels should be higher for the reference pattern.

There are diverse opinions regarding the healthful range of sugar intake, as well as the potential relationships between sugar intake and chronic diseases, such as diabetes, cardiovascular disease, obesity and weight maintenance (2,3). Current USDA dietary guidance is vague and nonspecific in relation to the levels of sugar consumption that can be considered healthful or appropriate within a daily pattern. Research has documented that consumers vary widely in their interpretation of the recommendations to consume "moderate" amounts of added sugars (4). There is a need for clear and understandable recommendations regarding sugar intake levels so that nutrition educators and consumers can apply these recommendations to promote healthful diets.

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The IOM established a maximal added sugar intake of 25 percent of calories (5). CNPP indicates that its proposed daily food patterns include between 6 and 13 percent of calories from added sugar. There is not agreement within the Society for Nutrition Education about the appropriate level of added sugar to include in the revision of the Food Guide Pyramid. Since this issue is important and controversial, this section will summarize key points raised by SNE members so that these points can be included in CNPP's consideration.

Some SNE members strongly support CNPP's proposed levels of sugar intake. In support of this approach, they note that added sugars provide calories, but few, if any other nutrients. Consumption of foods high in added sugars can displace more nutrient dense foods from the diet (6). An additional example from the literature further illustrates this concern: A reanalysis of the data that was done to produce the Food Guide Pyramid for Puerto Rico (7) indicated that "when caloric need is low, it is difficult to add fat and sugar to the diet and maintain an intake of nutrients that meets the RDA." Although it may be possible for some people to consume up to 25 percent of calories as added sugars and still meet dietary recommendations, it does not necessarily follow that professional recommendations should include maximum potentially acceptable levels of sugar consumption within the range used in consumer education materials. The range of added sugar intake proposed by CNPP should allow diet patterns that are acceptable and realistic in relation to current consumption patterns and that provide achievable goals.

SNE members who support the range of sugar intake proposed by CNPP also note that a group of international experts assigned by the WHO/FAO to study the scientific literature recommended that free sugars should be less than 10 percent of total energy (2). (These "free sugars" also include the sugars that naturally occur in fruits.) The experts assigned by the WHO/FAO admit that their recommendation is controversial, but cite methodological flaws in the studies that seem to indicate no relationship between free sugars and weight gain. The three points that they use to support their recommendation are: 1--"free sugars contribute to the overall energy density of diets", 2--they "promote a positive energy balance" and 3--"drinks that are rich in free sugars increase overall energy intake by reducing appetite control"(2).

Other SNE members strongly support using the IOM report's information about sugar intake in the development of the revised Pyramid. These members stress that IOM reports go through a more rigorous scientific review process than the WHO report. They recommend that CNPP be consistent in using the IOM report as the basis for its recommendations.

SNE recommends that CNPP give very careful consideration to the various arguments relating to sugar intake recommendations with the goal of providing clear recommendations that can form a solid basis for the work of nutrition educators to assist consumers to choose healthful diets.

3. Appropriateness of the proposed food intake patterns for educating Americans about healthful eating patterns.

A recent study has shown that current food groupings of the Food Guide Pyramid are confusing to the general public (8). The criteria used to develop these food groups include nutritional similarities among foods, similar uses of the foods in meals, and consumer perceptions of the

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foods as similar (1). Studies of how people manage their navigation through documents have shown that readers can easily absorb and understand about five categories, possibly as many as seven (9). Beyond that, they cannot remember the information. Therefore, SNE feels that an additional criterion should also be addressed: easy to manage by the general public.

The Society recommends the following revisions of the Food Guide Pyramid to educate Americans about healthful eating patterns:

Potatoes and similar starchy vegetables should be grouped with grain foods

Potatoes and similar starchy vegetables have traditionally been grouped with vegetables in guides that were based on a "foundation diets" such as the basic four or basic seven. There are reasons why potatoes and starchy vegetables should be moved to a "starchy plant foods" group. These reasons are: 1) the other practical use by consumers and 2) their nutrient profile. From a consumer perspective, rice, pasta and potatoes are typically considered interchangeable choices. In other words, an individual will often substitute rice or pasta for potatoes, but would rarely consider substituting other vegetables, e.g., squash or spinach, for potatoes. In terms of similar uses of the foods in meals the recommended change provides a more natural grouping than a grouping that separates grains from these starchy vegetables.

In the daily patterns presented by CNPP potatoes are grouped with corn and peas, as are other complex carbohydrates such as yucca, manioc, cassava, and plantains. These latter foods are not traditionally consumed by Americans of European descent, but they are consumed as a basic source of carbohydrates in diets from the tropics of all parts of the world, the Caribbean, and diets in many Latin American countries (7). SNE recommends that these other complex carbohydrate foods be grouped with grain foods in food guides.

With regard to their nutrient profiles, food tables show that a medium potato (or ½ cup) provides about 85-90 kcal, a slice of whole grain bread about 85 kcal, ½ cup of rice between 100 and 130 kcal depending on the type of rice, and ½ cup of pasta 90-100 kcal. When a comparison was made of the nutritional contribution of bland, starchy vegetables compared with whole grain or enriched cereals, the differences between the two types of cereals were greater than the differences between the starchy vegetables and the two cereal groupings (7). Potatoes had significantly greater potassium and vitamin C than the cereals, but neither of these nutrients is in danger of being over-consumed at toxic rates from normal foods. Both kinds of cereals had more protein than the starchy vegetables, but too little protein is not a common problem in American diets. Whole grain cereals had more magnesium, phosphorus, potassium, zinc, copper, manganese and vitamin B6 than their enriched counterparts. While there were insufficient data to make comparisons for most of these nutrients with the starchy vegetable group, potatoes were closer to enriched cereals for these nutrients than they were to whole grains (7). Given these nutrient profiles, if enriched cereals are considered an adequate source of complex carbohydrates, then potatoes can also be considered an adequate source.

For these reasons, the Society recommends that potatoes and other similar starchy, vegetables be grouped with rice, pastas, cereals and breads. This would require a change, in the current basis for a serving of foods from this food group from 1 oz. flour commodity equivalent to a gram

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Crockett

carbohydrate equivalent. Since the daily pattern given in Table 1 has half of the servings from whole grains and half from enriched, the suggested new balance would be half from whole grains and half from potatoes and other starchy vegetables or enriched grain products.

SNE appreciates that this proposed change would alleviate the observations of critics of the current Food Guide Pyramid when they point out that the most commonly consumed food in the vegetables group is potatoes, which have lower nutrient density than most other foods in the vegetable group.

Legumes

Legumes are nutrient-rich foods, and are especially good sources of healthful fiber that is low in U.S. diets. SNE recommends that CNPP give careful consideration to the placement of legumes within the revised Pyramid. The goal should be to select the placement that will best support the development of educational messages and materials to help consumers increase consumption of legumes.

Based on their nutrient profile – as high starch, fiber, and protein foods – a strong case can be made to locate legumes in the meat/protein group, the vegetable group, and/or the grain group. SNE suggests that CNPP conduct additional studies that will take into consideration what people consider to be the best overall natural food grouping(s) for legumes, based on how consumers use legumes in meals and family food patterns. These studies should examine the role that beans play in various vegetarian diets versus diets that include meat sources of protein. Research is also needed to assess whether consumers find it confusing for legumes to be included in more than one food group, as they are now. This information would make it easier to determine how to best group legumes to encourage their consumption.

Fruits and Vegetables

Some SNE members believe that fruits and vegetables should form the foundation of the diet along with grains. In a recent presentation at the 9th European Nutrition Conference in Rome, the point was made that there is consistent evidence that 8 or even 9 servings of vegetables and fruit each day should be consumed to optimize health, not 5 a day. SNE supports a greater emphasis on both legumes and fruits and vegetables in future revisions of the Food Guide Pyramid.

Oils/soft margarines

This group is designed to provide vitamin E and linoleic and α -linolenic acids. However, other foods that are also good to excellent sources of these nutrients – tree nuts, seeds and avocados – have not been included. Although consumption of these foods in the U.S. is currently low, SNE recommends the explicit inclusion of these foods in the group. The guidance should specify that peanuts, which are not rich in vitamin E (1), should be grouped with meat/protein foods. Some SNE members suggest that the tip of the pyramid and how fats in general, should be approached should be reconsidered. Saturated and trans fats should be separated from the monounsaturated and polyunsaturated fats.

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Vorhick
& Cravens

Water

Water is an essential nutrient for the human body. Until the IOM releases its report on water and electrolytes it is difficult to make a specific recommendation. Therefore, the Society urges CNPP to consider the upcoming recommendations so that a basis for adequate hydration can be included in the Food Guide Pyramid.

4. Use of commonly used food measures vs. "servings" in consumer materials to recommend daily amounts to choose from each food group and sub-group.

SNE recommends that the recommended quantities of foods be explicitly stated on the Pyramid graphic in terms of commonly used food measures such as cups and ounces. The current use of "servings" is a major barrier to using the Food Guide Pyramid. Comments received from nutrition educators in SNE indicate that many find they must spend excessive time explaining the serving sizes of foods, limiting the time available to adequately communicate the Pyramid's overall message: to eat the five major food groups (grains, potatoes and other starches, fruits, vegetables, milk and protein foods) in appropriate quantities. Furthermore, serving sizes for some foods in Food Guide Pyramid guidance are different from the serving sizes used in food labeling, increasing consumer confusion.

For example, if a reference pattern of 2,000 kcal were used, the recommended food quantities and number of multiples of these quantities to consume per day would be:

- Whole grains, potatoes and other starches: 1 cup or two slices of bread (4 per day)
- Vegetables: 1/2 cup cooked, 1 cup raw (4 per day)
- Fruits: 1/2 cup (3 per day)
- Milk and milk products: 16 fluid ounces or 2 cups (more added for growing children)
- Meats, poultry, fish, and eggs: 5 or 6 ounces (SNE recommends use of a whole number, rather than a fraction).

These food quantity recommendations could be scaled up or down proportionately to meet the caloric and nutrient needs of individuals with different activity levels, life cycle needs or body sizes.

SNE Summary Recommendations

1. Using various specific caloric levels for sedentary individuals at different ages is not deemed the most appropriate way to communicate what an individual should do. Instead, SNE recommends that one or three calorie levels be chosen--to provide the RDA's and Adequate Intake's (AI's). The selection of 2,000 kcals as the reference pattern would make the food guide more compatible with the food labels.

2. SNE recommends that CNPP give very careful consideration to the various arguments relating to sugar intake recommendations with the goal of providing clear recommendations that can form a solid basis for the work of nutrition educators to assist consumers to choose healthful diets.

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Voichick & Crockett

3. The criteria established by CNPP to develop food groups should include making the food groups simple and easy to manage by the general public. SNE has concerns about the ability of the public to be able to apply the sub-groups of vegetables as currently conceptualized.

4. SNE suggests that CNPP consider potatoes and other similar starchy, vegetables be grouped with rice, pastas, cereals and breads. This would require a change in how the servings of foods from this group are expressed. CNPP could use the data at hand regarding consumer patterns and nutrient composition to confirm or disconfirm this suggestion.

5. SNE urges CNPP to do choice studies to determine what people consider to be natural groupings for legumes; i.e. give the general public the option of placing legumes with meats, vegetables or grains to see what they select.

6. SNE supports a greater emphasis on legumes and fruits and vegetables in future revisions of the food guide pyramid.

7. SNE recommends that additional excellent sources of vitamin E and EFAs be included in the food guide pyramid.

8. SNE recommends that CNPP consider the IOM's impending report on water intakes so that a basis for adequate hydration can be included in the food guide pyramid.

9. In conjunction with #1 above, if a reference pattern of 2000 kcals is adopted for the Food Guide Pyramid, we suggest the basic serving sizes and/or daily intakes for this pattern to be:

- Whole grains, potatoes and other starches: 1 cup or two slices of bread (4 per day)
- Vegetables: 1/2 cup cooked, 1 cup raw (4 per day)
- Fruits: 1/2 cup (3 per day)
- Milk and milk products: 16 fluid ounces or 2 cups (more added for growing children)
- Meats, poultry, fish, and eggs: 5 or 6 ounces (SNE recommends use of a whole number, rather than a fraction).

10/29/03
Vorichick
&
Crockett

References:

1. Center for Nutrition Policy and Promotion. Notice of Availability of Proposed Food Guide Daily Food Intake Patterns and Technical Support Data and Announcement of Public Comment Period, 2003, p. 2-4.
2. Joint WHO/FAO Expert Consultation. Diet, Nutrition and the Prevention of Chronic Diseases. Geneva: WHO Technical Report Series 2003. 916, p. 56-57.
3. Murphy SP and Johnson RK. The scientific basis of recent US guidance on sugar intake. American Journal of Clinical Nutrition. 2003; 78(supp.): 827S-833S.
4. Keenan DP, AbuSabha R, Robinson NG. Consumers' understanding of the Dietary Guidelines for Americans: insights into the future. Health Educ Beh 2002; 29(1):124-135..
5. Institute of Medicine of the National Academies. Food & Nutrition Board, Dietary Reference Intakes for Energy, Carbohydrate, Fiber, Fat, Fatty Acids, Cholesterol, Protein and Amino Acids., Washington, DC: September 5, 2002. accessed on October 17, 2003 at <http://www.iom.edu/report.asp?id=4340>
6. Center for Nutrition Policy and Promotion. Is intake of added sugars associated with diet quality? Nutrition Insight 21, October 2000.

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October 22, 2003

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

Dear Team,

I use the FGP often in my nutrition education counseling. I'm wondering if whole grains could be depicted in the pyramid since they are so much more beneficial nutritionally than refined grain products. Also, if lower fat varieties of foods from the dairy and meat/ meat alternative groups could be depicted, I think that would be beneficial as well. For example, perhaps 1% milk could be added to the milk carton picture and chicken breast could replace a whole chicken.

Thank you very much for giving the public a chance to comment on our thoughts. I appreciate it!

Sincerely,

Gina Lombardi, R.D.

Gina Lombardi, R.D.

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October 24, 2003

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

To the Food Guide Pyramid Reassessment Team:

The International Bottled Water Association (IBWA) welcomes this opportunity to submit comment on proposed revisions to the food intake patterns that form the basis of the Food Guide Pyramid. 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.

IBWA stresses the importance of water consumption for proper hydration and refreshment and strongly encourages the inclusion of water consumption in the 2005 revision of the Dietary Guidelines and resulting Food Pyramid. The National Academy of Sciences Panel on Dietary Reference Intakes (DRIs) for Water is expected to report on specific water DRIs; a report that was scheduled for release in March 2003 but has been delayed with a possible release in, I have been informed, December 2003. DRIs are most often used as the scientific basis for additions/inclusion in the Dietary Guidelines. IBWA respectfully urges the Food Guide Pyramid Reassessment Team to seriously consider and utilize the science as reflected in the water DRI as a basis for inclusion of water for refreshment and hydration in the Food Guide Pyramid. If Guidelines are provided for general fluid intake, water - whether from a bottle or the tap - should be specified among those recommendations.

IBWA has noted that, while the final report on the 2000 Dietary Guidelines include references to the importance of drinking water, there are no specific daily intake recommendations. Proper hydration is absolutely crucial for human fitness, health, and well being. 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 Pyramid for all age groups.

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IBWA Letter -- Page 2 of 2

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. Based on statistics¹, the average consumer drinks up to two quarts of water per day, regardless of the source. Depending on an individual's weight and level of exercise or activity, that amount may vary. However, 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.

Bottled water, as a package food product regulated by the US Food and Drug Administration (FDA) is a sensible reference point for the Dietary Guidelines 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

¹ Derived from "2003 Bottled Water in the U.S." by Beverage Marketing Corporation and "Plain Talk About Drinking Water," by Dr. James M. Symons



NFPA

The Food Safety People

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ASSOCIATION

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October 27, 2003

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

RE: Notice of Availability of Proposed Food Guide Pyramid Daily Food Intake Patterns and Technical Support Data and Announcement of Public Comment Period
68 Federal Register 41507, July 11, 2003.

Dear Sir or Madam:

The National Food Processors Association (NFPA) submits the following comments on the notice referenced above.

The National Food Processors Association is the voice of the \$500 billion food processing industry on scientific and public policy issues involving food safety, food security, nutrition, technical and regulatory matters and consumer affairs. NFPA's three scientific centers, its scientists and professional staff represent food industry interests on government and regulatory affairs and provide research, technical services, education, communications and crisis management support for the Association's U.S. and international members. NFPA members produce processed and packaged fruit, vegetable, and grain products, meat, poultry, and seafood products, snacks, drinks and juices, or provide supplies and services to food manufacturers.

The USDA Center for Nutrition Policy and Promotion (CNPP) requests comments on five thematic issue areas related to proposed daily food intake patterns and technical support data for the Food Guide Pyramid (FGP) reassessment activity. NFPA submits these comments in an effort ultimately to improve public understanding of the FGP and increase its use as part of maintaining healthy weight, diet, and lifestyle with respect to food.

Appropriateness of using sedentary, reference-sized individuals in food intake patterns

NFPA concurs with the use of reference-sized individuals in the daily food intake patterns. However, we disagree with the selection of sedentary activity level for the energy expenditure target for developing daily food intake

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Food Guide Pyramid Reassessment Team
October 27, 2003
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patterns. In taking this approach, CNPP chooses to maximize nutrition, but to minimize physical activity in the energy balance equation related to diet and health. The FGP is a tool for Americans to put the Dietary Guidelines into action and choose what and how much to eat from food groups to get adequate nutrients and not too many calories.¹ Like the *Dietary Guidelines for Americans*, the FGP was developed and established for "healthy Americans."²

The approach taken by CNPP contradicts the philosophy and recommendation in the President's *HealthierUS* Initiative.³ The first topic within the *HealthierUS* initiative, Physical Fitness, recommends, "Be physically active every day. Learn how to make regular physical activity a routine part of your life."⁴ Further, the first two guidelines in the "Aim for Fitness" tier of the *Dietary Guidelines for Americans* focus on healthy weight and physical activity.⁵ Similar to the *HealthierUS* initiative recommendation, the Dietary Guideline for activity is "Be physically active every day." The keystone message in the "Build a Healthy Base" tier is "Let the Pyramid guide your food choices." On balance, NFPA believes the underlying principles for the FGP must acknowledge both attention to adequate nutrient intake balanced with physical activity at some level higher than "sedentary".

NFPA requests that USDA reconsider and recalculate daily food intake patterns within the "low active" range described in Table 2⁶ rather than using "sedentary". If nutrient standards are set to be adequate, we believe that physical activity levels higher than sedentary must be used for developing the daily food intake patterns.

Appropriateness of the selection of nutritional goals for the daily food intake patterns

The selection of nutritional goals for the daily food intake patterns is of concern to NFPA. While we concur that the Food and Nutrition Board's reports on Dietary Reference Intakes (DRI) are the correct nutrient reference standards to use, we believe that some DRI information remains to be considered in the reassessment. Further, NFPA disagrees with how CNPP has chosen to apply the DRIs to build the proposed daily food intake patterns.

¹ U.S. Department of Agriculture. 1992. The Food Guide Pyramid. Home and Garden Bulletin no. 252. Washington, DC: Government Printing Office. Also accessible at <http://www.usda.gov/cnpp/pyrabklt.pdf>.

² U.S. Department of Agriculture. Using the Food Guide Pyramid: A resource for nutrition educators. P. 1. Accessed at <http://www.nal.usda.gov/fnic/fpyr/guide.pdf>.

³ President's HealthierUS Initiative. 2003. Accessed at <http://www.healthierus.gov/>.

⁴ HealthierUS Initiative program components. 2003. Accessed at <http://www.healthierus.gov/exercise.html>.

⁵ U.S. Department of Agriculture and U.S. Department of Health and Human Services. 2000. Nutrition and Your Health: Dietary Guidelines for Americans. Fifth edition. Home and Garden Bulletin No. 232. Washington, DC: Government Printing Office. Also accessed at: <http://www.health.gov/dietaryguidelines/dga2000/document/frontcover.htm>.

⁶ Center for Nutrition Policy and Promotion, U.S. Department of Agriculture. Accessed at <http://www.usda.gov/cnpp/pyramid-update/FGP%20docs/TABLE%202.pdf>.

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Page Three

NFPA requests that the CNPP FGP reassessment fully consider the upcoming report on DRIs for water and electrolytes, rather than rely solely on the nutrition labeling standards used for the daily food intake patterns. Additionally, as CNPP moves forward with the reassessment project, we urge review and consideration of the pending recommendations from the FNB panel on Uses of Dietary Reference Intakes for Nutrition Labeling. This report may have implications worthy of consideration for the FGP, regulations and standards for USDA's food and nutrition programs, and USDA's nutrition labeling regulations for meat and poultry products.

Conspicuously absent from the FGP reassessment information is consideration of the 2003 FNB report, *Dietary Reference Intakes: Applications in Dietary Planning*.⁷ The 2003 DRI planning report was released after the CNPP FGP reassessment was well underway. Based on the recommendations in that report, we question whether the CNPP has utilized the DRI structure appropriately, and respectfully requests CNPP to justify why the approach of using RDAs (recommended dietary allowance) was taken versus the use of EARs (estimated average requirement) to develop the daily food intake patterns. We do agree with CNPP's assessment that in the case of nutrients or food components for which an EAR is not listed, the AI (average intake) should be used.

As noted by the values in Table 5, nutrient contributions based on the RDA often provide 250 percent or more of the RDA for a given age-gender life stage grouping.⁸ Nutrients that present challenges using this method include vitamin E and iron for many life stage groups. Calcium, for which an AI was established, also represents a challenge. CNPP should reconsider and reevaluate the daily food intake patterns using the EAR versus the RDA.

Our rationale is two-fold: one is the interpretation of the DRIs and how they are used to develop food guides for the population, and the other is the interpretation of the DRIs and how they are used for dietary planning. The current FGP is a tool that acknowledges that it does not meet the needs of "everyone". The proposed daily food intake patterns use pooled or grouped data and CNPP asks for comments toward using subsets of information from the twelve daily food intake patterns. Thus, the FGP and the basis for this reassessment are prepared from pooled data or information about groups, not individuals; and the resulting proposed daily food intake patterns are prepared for groupings by age, gender, and activity level, not specific to meet the individual needs of every American.

⁷ Institute of Medicine. 2003. *Dietary Reference Intakes: Applications in Dietary Planning*. Report of the Subcommittee on Interpretation and Uses of Dietary reference Intakes and the Sanding Committee on the Scientific Evaluation of Dietary Reference Intakes, Food and Nutrition Board. Washington, DC: The National Academies Press (prepublication copy).

⁸ CNPP, USDA 2003. Accessed at <http://www.usda.gov/cnpp/pyramid-update/FGP%20docs/TABLE%205.pdf>.

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When planning intakes for a group, the 2003 DRI report is very clear,

For groups, the goal of planning is to determine a usual intake distribution that results in a low prevalence of intakes that are inadequate or at risk of being excessive. The Estimated Average Requirement, AI, and Tolerable Upper Intake Level are used in planning the diets of groups.⁹

The 2003 DRI dietary planning report outlines a population-based approach to using the EAR (or AI, when no EAR exists) to develop diets for groups. The report summarizes the use of DRIs for planning intakes of apparently healthy individuals and groups in Box S-2.¹⁰ Figure S-1 of the DRI dietary planning report summarizes the decision tree for dietary planning.¹¹ For specific details, please see the report Summary and Chapter 3 and 4. Chapter 4 is particularly useful for segments of the population where nutrient intake patterns or needs are not normally distributed. By following these definitions and decision-making models, it is clear to NFPA that CNPP should use the EAR for nutrients in developing the proposed daily food intake patterns.

NFPA reiterates the need for CNPP to use DRI values and justify the use of the RDA versus the EAR. After addressing the issue of using the EAR versus RDA, there may be other strategies for addressing any shortfalls in the nutrient patterns, such as with vitamin E and with iron. Such strategies might include reconsideration of national enrichment requirements or fortification policy. We realize that for most foods, this is not under USDA's jurisdiction, but consideration should be given to this issue.

Appropriateness of the proposed food intake patterns for educating Americans about healthful eating

NFPA believes that the basic architecture of the food patterns is sound, but reserves final judgment once consideration has been given to using the EAR as the nutrient standard upon which to evaluate nutrient composition of daily food intake patterns.

Appropriateness of using "cups" and "ounces" vs. "servings".

While not important for technical development of the daily food intake patterns, this issue is a critical consideration for enabling consumers to utilize the FGP when making food choices within and among food groupings. To maximize consumer benefit, NFPA believes that the FGP should move to serving sizes and use of household measures as used in nutrition labeling. There will always be some tension between the FGP and the food label. However, if consumer nutrition education materials can focus on servings expressed as portions, NFPA believes that government nutrition and food information tools such as the FGP and the Nutrition Facts panel can better deliver information of use to consumers for building healthful diets. We urge CNPP

⁹ IOM 2003, p. 3.

¹⁰ IOM 2003, p. 3.

¹¹ IOM 2003, p. 4.

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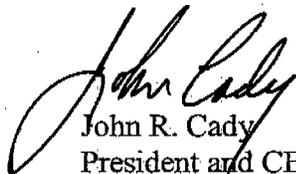
to invest in consumer testing and evaluation when education materials or revisions to the FGP are prepared for phase three of the reassessment process.

Selection of appropriate illustrative food patterns for various consumer materials.

As was the choice in development of the original FGP, NFPA believes that a subset of food intake patterns that are based on a range of calories or a central number will be most useful to consumers. Using the full range or spectrum of daily food intake patterns will not serve any use for educating consumers about healthful diets. NFPA believes that there may be value in looking at harmony between the FGP and the nutrition label to increase focus on the relationship between food choices based on nutrition information from food labels and those from a food guide to fulfill the healthy eating and lifestyle choices embodied in the current and future *Dietary Guidelines for Americans*. All three tools – the nutrition label, the FGP, and the *Dietary Guidelines for Americans* – must be approached from a more systematic and integrated approach across government. As guidance to consumers on quantity of foods within a daily food intake pattern, NFPA underscores the need for comprehensive testing and evaluation of consumer materials to accompany the FGP in the future.

Thank you for the opportunity to comment on this important issue. As USDA proceeds forward with the Food Guide Pyramid reassessment, we look forward to future discussions about ways to maximize flexible use of the food guide graphic and to integrate it with government-wide and industry efforts to educate the public about “How to Eat” and live healthful lifestyles. We hope our comments, insights, and recommendations included herein are useful as CNPP refines and finalizes the FGP reassessment.

Regards,



John R. Cady
President and CEO
National Food Processors Association