

NATIONAL COUNCIL ON FOLIC ACID

October 27, 2008

2010 Dietary Guidelines Advisory Committee
Carole Davis
Co-Executive Secretary of the Dietary
Guidelines Advisory Committee
Center for Nutrition Policy and Promotion
U.S. Department of Agriculture
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Dear Secretary and Members of the Advisory Committee:

Thank you for the opportunity to submit comments to the 2010 Dietary Guidelines Advisory Committee concerning revisions to the Dietary Guidelines for Americans.

The National Council on Folic Acid (NCFA) is a partnership of over 60 national organizations and associations, state folic acid councils and government agencies whose mission is to improve health by promoting the benefits and consumption of folic acid.

The following comments focus on the importance of the Dietary Guidelines for Americans recommendations to include consuming 400 micrograms of synthetic folic acid daily, either from a multivitamin that contains 400 micrograms of folic acid or from fortified foods.

Folic acid is a B-vitamin necessary for proper cell growth. It helps to prevent certain birth defects such as neural tube defects (NTDs) which occur very early in pregnancy, often before a woman knows she's pregnant. The Centers for Disease Control and Prevention (CDC) and the Institute of Medicine recommend that all women capable of becoming pregnant should consume 400 micrograms daily to reduce the risk of having a pregnancy affected by an NTD. The daily dosage of 400 micrograms can reduce the risk of having an NTD-affected pregnancy by up to 70%.

The most common NTDs are spina bifida and anencephaly. Spina bifida is a serious birth defect in which the spine does not form properly, leaving an opening in the spine

and exposing the spinal cord to possible damage. The neurological damage and mobility impairment, including paralysis and weakness of the lower extremities, can create a challenge for everyday activities and educational attainment. The annual medical care and surgical costs for persons with spina bifida in the United States exceed \$200 million.¹ Anencephaly is a fatal condition in which the skull fails to develop properly. The brain either never completely develops or is totally absent. Pregnancies affected by anencephaly often result in miscarriages. Infants who are born alive die very soon after birth.

The Healthy People 2010 Objective 16-16 is to “increase the proportion of pregnancies begun with an optimum folic acid level.” The 16-16a target for “consumption of at least 400 µg of folic acid each day from fortified foods or dietary supplements by nonpregnant women aged 15 to 44 years” is 80%.² The inability to achieve this goal to date is another reason the 400 microgram recommendation needs to be addressed in the Dietary Guidelines.

Fortification of certain grain products has been mandated since 1998. Data from the National Health and Nutrition Examination Survey (NHANES III (1988-1994) and the 1999 NHANES (post fortification) indicated that the serum folate concentration in women 15-44 years old increased almost three-fold after mandated fortification. The author concluded, “Because substantial increases have not occurred in the reported use of folic acid-containing dietary supplements during 1995-2002, the assumption is that the majority of this rise in blood folate levels is the result of consumption of fortified cereal grain products (e.g., bread and pasta) and from fortified ready-to-eat breakfast cereals.”³ A 19% decrease in NTDs—23% and 11% for spina bifida and anencephaly respectively—has been reported since the introduction of mandated fortification.⁴

Due to the importance of fortification, we recommend the Committee retain the historical guidance emphasizing the importance of fortified and enriched grains as part of a healthful diet. It is imperative that the 2010 Dietary Guidelines Advisory Committee include 400 micrograms of synthetic folic acid in the Dietary Guidelines, either from fortified foods or a multivitamin supplement, in addition to a healthy diet of food folate.

¹ Centers for Disease Control and Prevention. 2005.
http://www.cdc.gov/ncbddd/folicacid/health_overview.htm accessed October 23, 2008.

² US Department of Health and Human Services. Healthy People 2010. 2nd ed. Washington DC: Department of Health and Human Services, 2000.

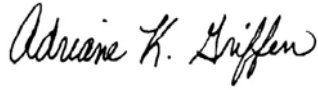
³ *Folic Acid and Prevention of Spina Bifida and Anencephaly*, Erickson, JD. CDC Morbidity and Mortality Weekly Report, 2002, September 13, 51: No. RR-13.

⁴ *Impact of Folic Acid Fortification of the U.S. Food Supply on the Occurrence of Neural Tube Defects*, Honein, MA., et al., JAMA 2001: 285:2981-2986.

The National Council on Folic Acid is managed by the Spina Bifida Association, 4590 MacArthur Blvd., NW, Suite 250 2
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Again, thank you for the opportunity to present these comments.

Sincerely,



Adriane K. Griffen, MPH, CHES
Chair, National Council on Folic Acid

The following members of the National Council on Folic Acid support this letter:

American College of Obstetrics and Gynecology
Association of Women's Health, Obstetric & Neonatal Nurses
Folic Acid Council of Pennsylvania
Spina Bifida Association

A complete directory of National Council on Folic Acid coalition members and web site addresses is available online at www.folicacidinfo.org.