

October 24, 2008

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

RE: 2010 Dietary Guidelines Advisory Committee Written Comments

Dear Ms. Davis:

The Spina Bifida Association (SBA) appreciates the opportunity to provide comments to the Department of Agriculture and the Department of Health and Human Services Dietary Guidelines Advisory Committee, as the *Dietary Guidelines for Americans* are reviewed and revised. As you undertake the development of the 2010 guidelines, we urge you to consider updating the guidelines, by adding a specific recommendation of at least 400 micrograms (mcg) of folic acid for women of childbearing age and incorporating messages about the importance of folic acid consumption into the press release and other collateral materials associated with the dissemination of the new guidelines.

SBA serves adults and children who live with the challenges of Spina Bifida, the nation's most common, permanently disabling birth defect. Since 1973, SBA has been the only national voluntary health agency solely dedicated to enhancing the lives of those with Spina Bifida and those whose lives are touched by this challenging birth defect. Its tools are education, advocacy, research, and service; and the programs give hope and strength to more than 250,000 people, whose lives are touched by this disabling birth defect. One of the SBA's most vital functions is to communicate to the 65 million women of childbearing age the importance of daily folic acid intake in reducing the risk of neural tube birth defects, such as Spina Bifida. We are proud that SBA also serves as the official administrative agent for the National Council on Folic Acid; in this role we lead the collaborative effort between national health organizations, federal agencies, and industry to educate women of childbearing age about the importance of folic acid intake.

Folic Acid Fortification of U.S. Food Supply

The risk of Spina Bifida and other serious birth defects can be reduced by up to 70%, if women of childbearing age consume 400 mcg of folic acid (a B-vitamin) every day. Folic acid is a B-vitamin that helps build healthy cells. During periods of rapid growth, such as pregnancy and fetal development, the body's requirement for this vitamin increases. Since Spina Bifida occurs early in pregnancy, often before a woman knows she is pregnant, it is important to take folic acid every day.

As you know, beginning in 1996, the Food and Drug Administration (FDA) issued a requirement that folic acid be added to specific flour, breads and other grains. These foods were chosen for "fortification" with folic acid, because they were staple products for most of the U.S. population. In January 1998, the FDA added a requirement that folic acid be added to food products which use enriched flour. These fortified foods include most enriched breads, flours, corn meals, rice, noodles, macaroni, and other grain products. Since 1992 the U.S. Public Health Service, the Centers for Disease Control and Prevention (CDC), and organizations like the SBA have recommended that women who could become pregnant consume 400 mcg of folic acid every day – either through a daily multi-vitamin, fortified foods, or some combination of both. We are pleased that today, most over-the-counter multi-vitamins contain an adequate daily dose of folic acid.

From 1999 through 2004, there was an 8% to 16% decline in the level of the vitamin folate in the blood of U.S. women of child-bearing age, according to a study published in the January 5, 2007 issue of the *CDC Morbidity and Mortality Weekly Report*. Studies have shown that only one-third of U.S. women of childbearing age consume the daily recommended amount of folic acid. While some breakfast cereals do have the full recommended amount of 400 mcg in a single serving, generally most fortified products fall short. This is due, in part, because the FDA only requires that 40 micrograms of folic acid be added per 100 grams (3.5 ounces) of bread and other grain products; this level alone will not meet the recommended 400 micrograms each day for most consumers. As such, we believe that it is imperative for the 2010 Dietary Guidelines to include messages and information about the importance of consuming a variety of folic acid fortified food products, food folate from a varied diet, and to discuss the value for women of childbearing age to take a daily multi-vitamin.

Foods Not Currently Required to be Fortified

Whole-grain breads are not under the current FDA mandate, because they already contain some folate (naturally occurring folic acid). Corn flours also are not under the FDA mandate, as they do not have a Standard of Identity (SOI) established by the FDA. This means that corn flours have not been defined by the FDA as a grain product requiring folic acid fortification.

While corn meal products manufactured in the United States are subject to the FDA fortification requirements, corn meal products manufactured in — and imported from — other countries (e.g., imported tortillas) often are not fortified. Given that corn flours and many imported corn products serve as a staple in the diets of many Hispanic Americans, the CDC believes that this deficiency contributes to the disproportionate rate of Spina Bifida among Hispanic women in the United States. Research indicates that a Hispanic woman in the U.S. is 1.5 to 2 times more likely to deliver a baby with neural tube defects, than a non-Hispanic White woman.♦

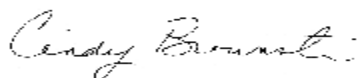
SBA and its sister organization, the Spina Bifida Foundation, along with the CDC and the National Council on Folic Acid have been facilitating discussions with Gruma — the largest exporter to the United States of corn flour products — to encourage the Mexican-based company to begin fortifying its products to meet the FDA standard. Gruma is planning to petition the FDA to allow folic acid fortification of the corn flour products that it manufactures.

Conclusion

It has been more than ten years since the FDA issued regulations requiring folic acid fortification of certain foods, and there is evidence that this enrichment has helped reduce Spina Bifida and other neural tube defects by approximately 26%. Experts at the CDC and other public health professionals believe that if the amount of fortification is increased for grain products and if corn products are included in the scope of fortified foods, the number of Spina Bifida and other neural tube defects affected pregnancies could be decreased annually by another 1,000, or more.

SBA urges the Dietary Guidelines Advisory Committee to include increased folic acid consumption for women of childbearing age, as well as to include corn and corn based products, to list folic acid enriched foods in their recommendations to the Secretaries concerning the revision of *Dietary Guidelines for Americans*. Thank you again for allowing us the opportunity to provide these comments. Should you have any questions, or if we can be of any assistance to you or the Committee, please do not hesitate to contact me (202/944-3285, ext. 14, cbrownstein@sbaa.org).

Sincerely,



Cindy Brownstein
Chief Executive Officer
Spina Bifida Association

♦ Laura J. Williams, Sonja A. Rasmussen, Alina Flores, Russell S. Kirby and Larry D. Edmonds, Pediatrics 2005; 116: 580-586