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November 2, 2023

Janet M. de Jesus, MS, RD  
HHS/OASH Office of Disease Prevention and Health Promotion (ODPHP)  
1101 Wootton Parkway  
Suite 420  
Rockville, MD 20852

Re: Docket OASH-2022-0021

Dear Director de Jesus:

On behalf of Oldways, a 501(c)3 educational nonprofit dedicated to inspiring people to embrace the healthy and sustainable joys of the old ways of eating, we are writing to provide comments on the 2025 Dietary Guidelines Advisory Committee (DGAC) food pattern modeling approach (Docket OASH-2022-0021).

Oldways has been documenting traditional cultural foodways for more than three decades, leveraging the expertise of diverse committees of subject-matter experts in both nutrition research and culinary history across a broad range of cultural diets. Additionally, our organization created and runs the Oldways Whole Grains Council and has been involved in whole grain education and labeling in the United States and in many other countries over the past 20 years.

We applaud the focus on cultural food traditions in the 2025 DGAC process. However, we are deeply concerned by some of the assumptions made about the makeup of cultural diets and we believe that changes are needed in order to reduce racial and ethnic health disparities.

### **Comments Regarding Modification of the Grains Group**

The DGAC reports that these food pattern models are meant to “better reflect intake variability and the range of possible healthful diets based on our diverse populations.” What fails to make headlines, however, is that whole grains have a rich history in just about every diverse cultural food tradition on the planet. Oldways has been documenting traditional cultural foodways, in which whole grains nearly always play a vital role, for more than three decades. Erasing the historical and cultural importance of whole grains in diverse traditional diets does a disservice to Americans of all racial and ethnic backgrounds.

While a vocal minority may assume that whole grains are not a part of certain cultural food traditions and that certain racial populations are less inclined to eat whole grain foods, the data do not support this harmful stereotype. According to the Oldways Whole Grains Council’s census-representative Whole Grain Consumer Insights Survey, 75% of white Americans, 78% of Black Americans, 80% of Latinx Americans, and 87% of Asian Americans report wanting to eat more whole grains. USA Rice’s 2023 Research on Rice Eating Occasions compiled by The Hartman Group found that brown rice was [more likely](#) to be consumed when connecting with one’s own heritage or



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ethnicity. Similarly, uplifting traditionally consumed whole grains (like millets) is [recommended](#) as a key strategy for culturally sensitive carbohydrate modification.

We have been monitoring whole grain trends and preferences for more than two decades, and we recognize the importance of corn- and rice-based products for certain cultural demographics. However, strengthening the whole grain recommendations in the Dietary Guidelines for Americans and other federal nutrition programs makes room for even more whole grain versions of these kinds of products to be developed and introduced. In the decade that followed the 2005-2010 Dietary Guidelines for Americans' first recommendation to make half your grains whole, [data from the Oldways Whole Grain Council's Stamped Product Database indicate](#) that manufacturers responded by increasing the percentage of the grain that is whole in their products and developing more whole-grain products for consumers. Policy changes can make a big difference in the food supply, and we trust that a clear recommendation for increased whole grain consumption in the DGA would create space for an even greater number of culturally relevant whole grain products to be brought to market at accessible price points.

The [Global Burden of Diseases Study](#) found that "low intake of whole grains was the leading dietary risk factor for [disability adjusted life years] among men and women and the leading dietary risk factor for mortality among women" ahead of high sodium intake, high trans-fat intake, and high sugar-sweetened-beverage intake. The 2020-2025 Dietary Guidelines for Americans report that most Americans exceed the recommended intake for refined grains, while 98% fall short of the recommended whole grain intake. Deemphasizing whole grains in a population where whole grain intake is too low and refined grain intake is too high is an unnecessary threat to public health, and sends consumers misleading signals about the role of whole grains in a healthy diet.

[Previous iterations of the DGAC Report](#) have noted, "if whole grains were consumed in the amounts recommended in the Food Patterns, whole grains would provide substantial percentages of several key nutrients, such as about 32 percent of dietary fiber, 42 percent of iron, 35 percent of folate, 29 percent of magnesium, and 16 percent of vitamin A." Now double that, and imagine the nutrient contribution if we made all of our grains whole.

Folate, in particular, has been singled out as a nutrient of concern, but if Americans eat a diet full of whole grains (which would provide 70% DV for folate) and top it off with leafy greens and legumes, as advised in many of the food patterns, then it should be no struggle to get the recommended amount of folate. Grains and starches were never meant to provide 100% of all necessary nutrients, but as part of an overall balanced diet, whole grains will certainly get us much closer than alternative choices.

Given the clear and consistent evidence linking whole grain intake with numerous health benefits, it is deeply concerning that the DGAC is perpetuating harmful stereotypes around whole grain acceptability and considering replacing part of the whole grains group with other carbohydrate sources like starchy vegetables. We urge the DGAC to restore the often-unsung legacy of healthy eating in communities of color by recognizing whole grains' role in diverse cultural food traditions.

### **Comments Regarding Modification of the Protein Group**



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We lend strong support to the investigation of diets with a higher ratio of plant-based protein. Like the Mediterranean Diet, African Heritage Diets, Asian Heritage Diets, and Latin American Heritage Diets also share a plant-forward pattern featuring many common food groups. This in turn provides the framework to describe the more specific foods eaten in a particular country or region. (e.g. “rice and bean” dishes like Caribbean Peas and Rice, Greek Chickpeas and Rice, or Mexican Tomato Rice and Black Beans).

The shift towards more plant-based foods also creates better alignment between human and planetary health. A path toward sustainable foodways helps ensure our planet will be able to support the growth of healthy, nutritious foods for generations to come. After all, the best dietary advice on the planet is meaningless if we aren’t able to produce or access the foods recommended for health. As noted in the [EAT-Lancet Summary Report](#), “food is the single strongest lever to optimize human health and environmental sustainability on Earth.”

### **Comments Regarding Ultra Processed Foods in Food Modeling**

We encourage the DGAC to consider not just the amount of ultra-processed foods, but the type of ultra-processed foods and their key ingredients, as well as their relationship with diet quality. Emerging research indicates that diets centered around ultra-processed foods (particularly those high in sugar, salt, and fat) may be linked with increased risk of [weight gain](#) and [diet-related diseases](#). However, not all ultra-processed foods are created equal.

Under the popular [NOVA](#) classification of food processing, staple health foods like mass market 100% whole grain bread would be considered “ultra-processed,” alongside foods of far inferior nutritional quality, such as soft drinks. Likewise, the NOVA classification draws no distinction between whole grains and refined grains, as whole wheat flour, brown rice, and quinoa would be in the same category as refined flour and white rice. This classification system fails to recognize the significant nutritional differences between whole grain ingredients, in which the healthful bran and germ are retained, and refined grain ingredients, where the bran and germ are stripped away. Thus, we urge the committee to take a nuanced approach and focus on diet quality and the impact of different processing methods rather than viewing all ultra-processed foods as interchangeable.

### **Closing Remarks**

At Oldways, we have found that culture and heritage can actually motivate people to embrace healthier diets. For example, a 2022 [study](#) published in the *Journal of Nutrition Education and Behavior* shows that 98% of participants of A Taste of African Heritage (a 6-week cooking and nutrition curriculum in the SNAP-Ed Toolkit featuring foods from the African Diaspora) report that history and heritage were positive motivators for living and eating well.

While we lend our support to the focus on cultural food traditions in the 2025 DGAC process, we urge the DGAC to redress existing stereotypes around whole grain acceptability and proceed carefully around the concerns described above.



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We thank the HHS and ODPHP for the opportunity to share our expertise on the DGAC process, and we look forward to learning more about how we can work together to improve public health and support greater health equity.

Sincerely,

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