

AUG 23 2004

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Havala/Mangels

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The



VEGETARIAN Resource Group

VEGETARIAN JOURNAL PO BOX 1463 BALTIMORE, MD 21203 (410) 366-VEGE

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August 23, 2004

The 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:

The Vegetarian Resource Group is a nonprofit educational organization that works with individuals, consumer groups, food companies, professional associations, government agencies, academic institutions, and other relevant constituencies to disseminate accurate information and sound advice to the public concerning vegetarian diets.

We appreciate the opportunity to share our ideas for modifications to the Food Guide Pyramid. We have an interest in this tool being relevant to the broadest range of individuals, including the increasing number of population groups with eating patterns that do not conform to traditional US patterns.

We have several concerns about limitations of the pyramid, as it currently exists. Namely:

- It should support a more plant-based diet, which has been shown to reduce risk of a number of chronic diseases and is being recommended by many health organizations;
• It does not promote the use of whole grains;
• Diets planned using the Food Guide Pyramid are frequently low in vitamin E;
• It does not differentiate between saturated fats and unsaturated fats;
• It does not differentiate between protein sources;
• It implies that dairy products are an essential part of the diet rather than depicting rich plant sources of calcium;
• It does not include fortified soy beverages, which are a healthful alternative to dairy products and are rich in protein, calcium, vitamin D, riboflavin, and vitamin B-12.

We have the following suggestions for improving the Food Guide Pyramid:

- The "Breads, Cereals, Rice and Pasta" group should be prefaced by the descriptive term "whole grain" and accompanied by a recommendation that at least 50 percent of choices should be whole grains. Graphics should emphasize whole grain products.
• Dry beans are now included in the "Meat, Poultry, Fish, Dry Beans, Eggs, and Nuts" group. Dry beans contain substantial amounts of

dietary fiber and beneficial phytochemicals, substances for which greater consumption is encouraged. They are high in protein but low in total fat and saturated fat. Nuts are rich sources of unsaturated fat. In contrast, meat, poultry, fish, and eggs contain no dietary fiber and contribute saturated fat and cholesterol, substances consumed in excess in the US diet. Reordering the list as "Dry Beans, Nuts, Eggs, Fish, Poultry, and Meat could help indicate that dry beans are a particularly healthful choice. In addition, more graphics of non-meat sources of protein should be used.

- The FGP should support adequate intakes of vitamin E. Greater emphasis should be placed on nuts, nut butters, and vegetable oils. This might be accomplished by adding a new food grouping titled "Nuts and Seeds Group."
- Currently, all fats are included in the tip of the pyramid as "Fats, Oils, and Sweets." Health-supporting fats from vegetable oils, nuts, and seeds should not be grouped with saturated fats and trans fatty acids.
- Since many consumers use only limited amounts of dairy products, and given that dairy products are not traditionally included in the diets of many ethnic groups, the FGP should emphasize multiple sources of calcium in place of the current "Milk, Yogurt, and Cheese Group." The list should include dark green vegetables and fortified foods, including soymilk, rice milk, and fruit juices fortified with calcium. While these foods contribute comparable amounts of calcium, plant sources of calcium have the added advantage of being low in saturated fat and devoid of cholesterol as compared with milk and other dairy products, which are the major contributors of excessive intakes of these nutrients in the US diet. Nondairy sources of calcium should be included in the graphic representation of the FGP. In fact, rules now permit soymilk to be served in lieu of cows milk in the NSLP. We are including a copy of an article where a Food Guide Pyramid for vegetarians was developed to identify high-calcium foods from each food group. This could be modified for the general public to illustrate the importance of a variety of sources of calcium.
- While all foods can have a place in a health-promoting diet, some foods are more nutrient dense than others. We suggest developing a graphic to identify nutrient-dense foods in each food group and differentiate better choices from those foods that should be eaten not more than occasionally. For example, cooked dried beans are a nutrient dense food. Luncheon meats, which are in the same group, should be eaten sparingly, if at all.
- The existing FGP, with its emphasis on animal products, does not meet the needs of vegetarians and an increasing number of populations with eating patterns at odds with a traditional US diet.

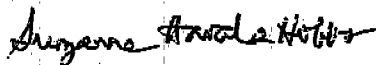
Havala/Mangels

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A recent Harris poll conducted for the Vegetarian Resource Group found that 6 percent of the US population regularly avoids consuming meat. The food industry has identified an even larger number of "meat restrictors," individuals who are actively reducing their dependence on foods of animal origin. Finally, data from Census 2000 underscore the fact that our increasingly diverse racial and ethnic US population requires food programs and recommendations that are designed with cultural competency in mind. For example, a majority of those who today are considered racial or ethnic minorities are lactose intolerant and/or have no tradition of consuming dairy products. Since one objective of the revision of the FGP is to make it possible for consumers to personalize the pyramid, we urge you to consider these groups, including the vegetarian audience, when developing modifications that allow consumers to personalize the FGP.

Thank you for your consideration of these comments.

Sincerely,



Suzanne Havala Hobbs, DrPH, MS, RD  
Reed Mangels, PhD, RD  
Nutrition Advisors, VRG

Havala | Mangels | 4 of 4

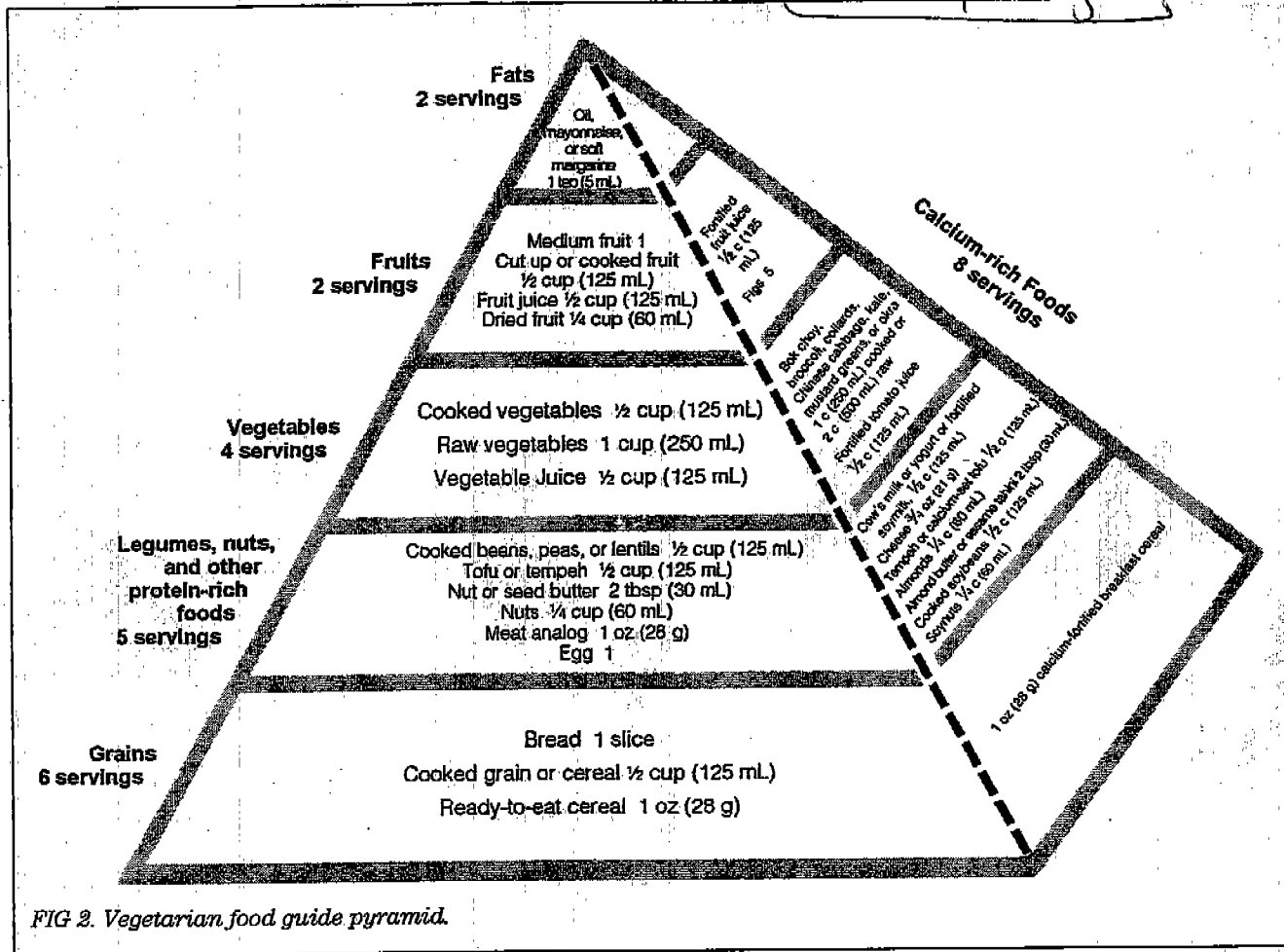


FIG 2. Vegetarian food guide pyramid.

energy needs by choosing more servings from any of the food groups. Regardless of energy needs, most food choices should come from these groups, with only moderate servings of sweets and alcohol at most.

**EXPANDED CHOICES FOR MEETING CALCIUM NEEDS**

Survey data suggest that vegans account for as much as 40% of the actual vegetarian population (13). Actual vegetarians are those who never eat meat, in contrast to self-described vegetarians, many of whom actually eat some type of animal flesh regularly. Therefore, any guide aimed at vegetarians must consider the needs of vegans. Studies also indicate that a substantial percentage of vegan women as well as some lacto-ovo-vegetarian women (lacto-ovo-vegetarians are those vegetarians who use dairy products and eggs) have calcium intakes that are too low, which suggests that calcium deserves special attention in vegetarian food guides (14). With few exceptions, vegetarian food guides have not provided appropriate guidelines for vegans. A number of guides have included an optional dairy group, which presents the risk that consumers will choose diets that are deficient in both calcium and protein. Other guides have included a dairy group that also includes fortified soy milk.

However, not all vegans choose to consume soy milk daily. Those who do may not wish to consume the two to three recommended servings. For many families, the expense of soy milk compared with cow's milk makes it an unrealistic choice as the primary source of calcium in the diet.

This food guide illustrates acceptable choices in addition to dairy foods and fortified soy milk for meeting calcium needs. It incorporates the principles of variety and moderation and encourages consumers to consider more plant foods as sources of nutrients. This is in keeping with government recommendations. Although this food guide does not emphasize the value of one calcium source over another, there may be an advantage to including more plant sources of calcium in diets because research suggests that other compounds in plant foods, such as isoflavones in soy foods (15) and potassium (16) and vitamin K (17) in fruits and vegetables, may favorably impact bone health.

By including foods that provide approximately 10% to 15% (100 to 150 mg) per serving of the adult adequate intake for calcium, we have allowed consumers to meet calcium needs using a variety of foods in realistic serving sizes. Although the serving size of one-half cup for milk differs from many other food guides, it is consistent with common serving sizes on many



We make 5 A Day fun!  
www.dole5aday.com

AUG 23 2004  
*[Handwritten initials]*

August 20, 2004

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Myrdal 10/1

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

Dear Food Guide Pyramid Reassessment Team:

I am writing on behalf of Dole Food Company to express our opinions on Food Guide Pyramid revisions.

First, regarding the shape, we support building on the equity in the Pyramid. The Pyramid is a well-recognized graphic that with some "tweaking" could become an even more powerful nutrition education and behavior change tool. However, we believe the Pyramid must more clearly communicate the need for consumers to make wise choices and specifically, to increase fruit and vegetable intake.

The Dietary Guidelines Advisory Committee stands poised to make the recommendation for consumers to eat at least **5 to 13 servings of fruits and vegetable a day**, depending on their calorie needs. Given this increased emphasis on fruits and vegetables, the new Food Guidance System must better reflect this higher number and **place fruits and vegetables more prominently in the graphic**. If the current shape of the pyramid is to remain—and we recommend that you do keep the current pyramid shape—**fruits and vegetables should be at the bottom** to more accurately reflect the increased emphasis as determined by the Dietary Guidelines Advisory Committee.

Across the board, consumers in all age groups – from the very young to the elderly – are not meeting dietary recommendations for fruit and vegetable intake. Therefore, in order to start moving consumers beyond the basic recognition phase of the Pyramid, Dole Food Company strongly urges that the graphic and key messages focus on those areas in most need of change. This is a more targeted and cost-effective approach to change behavior and puts the Pyramid concepts into actionable steps.

We thank you for this opportunity to help shape your decisions, and we applaud your efforts at leading the way to more healthful eating in the United States!

Sincerely,

*Amy G. Myrdal*

Amy G. Myrdal, MS, RD  
Director of Nutrition Marketing & Education  
Dole Food Company, Inc.

Dole 5 A Day Program  
[Redacted]  
Estlake Village, CA  
[Redacted]  
[Redacted]  
[Redacted]



# Rast Produce Company



AUG 23 2004

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Telephone: \_\_\_\_\_

Fax: \_\_\_\_\_

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

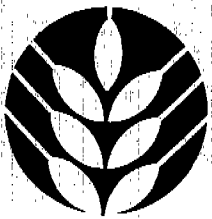
August 20, 2004

I am writing in support of revising the Food Guide Pyramid to recommend that consumers eat five to 13 servings of fruits and vegetables a day. The benefits of fruits and vegetables being the core of our diet are well documented and need to be communicated and reinforced to consumers.

I strongly encourage you to keep the current pyramid shape, with fruits and vegetables at the bottom. Thank you for your consideration.

Sincerely,

John Rast  
President



# American Bakers Association

AUG 23 2004

*Serving the Baking Industry Since 1897*

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Sanders 10/26

August 23, 2004

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

**RE: Federal Register Notice 42030, Volume 69, No. 133, July 13, 2004**  
Center for Nutrition Policy and Promotion; Notice of Availability of  
Proposed Food Guide Pyramid Daily Food Intake Patterns and Technical Support  
Data and Announcement of Public Comment Period

Dear Dr. Hentges:

The purpose of this letter is to voice the American Bakers Association (ABA), views regarding the Food Guide Pyramid graphic. ABA is the national trade association representing the wholesale baking industry and our membership consists of bakers and bakery suppliers who together are responsible for the manufacture of approximately 80 percent of the baked goods sold in the United States.

Our comments provide input on the six areas which USDA requested guidance in the Federal Register notice:

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

ABA commends USDA and CNPP for using sound science to base the visual graphic for the Dietary Guidelines for Americans. According to the most recent joint ABA/Wheat Food Council's Gallup Survey (2002), the Food Guide Pyramid was recognized by 76 percent of American adults over the age of 18 (another five percent were familiar with it in name only). Eighty-two percent of those agreed that the Food Guide Pyramid is the foundation for a sensible and healthy eating plan. Given this high level of recognition, it should not be overlooked in an effort to make it a more effective education tool. That said, it has not been a fully successful educational tool since it is estimated that less than 10 percent of Americans actually follow the Pyramid recommendations. Government communications efforts to educate the public on the pyramid have been limited due to budgetary constraints.

Sanders JAF6

In a time when the government is under fire because of the incorrect public perception that the Pyramid recommendation has caused obesity, it would not be prudent to change the shape and reinforce that perception. This would only reaffirm, that the dietary advice given since 1992 was wrong. It is however, a time to make the graphic simpler, forcing people to search for more detailed information.

Although ABA understands that this is an eating guide, we have no objection to a base level of physical activity emphasizing the relationship between calories in and calories out. However, we would not want this to divert attention from the food guidance focus of the Pyramid.

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

The Food Guide Pyramid cannot stand alone as an educational tool -- it is only a graphic symbol for healthful eating. Therefore, we could support using just the shape as a logo along with a tagline reminding people of balance, variety, moderation and the need for accompanying physical activity. A tagline such as "Make Your Calories Count" would be a reminder of the importance of the level of calories appropriate for each individual.

Trying to emphasize dark green leafy vegetables, nutrient rich fruits, lean meats, low-fat dairy products or whole and enriched grains, is more information than any one graphic can possibly depict. ABA thinks this information can be addressed in accompanying materials if the pyramid symbol is to be simplified.

ABA strongly believes that if there continues to be a "base" of the Pyramid or what ever shape the graphic takes, it is important that the grains group remains there. Research has shown that grain foods are needed to provide B vitamins (including folic acid), iron, fiber and numerous other vitamins, minerals and phytonutrients. In addition, they are inexpensive, convenient, easy-to-store, popular and hold a predominant place in the diet of nearly all cultures. This can not be said for all food groups.

While there is a strong consensus for the value of whole grains because of their *fiber* content, it is also important to consider their contributions of *antioxidants* and numerous other nutrients. One thing all researchers agree upon is that the "whole is more than the sum of its parts." In addition, "fiber is not fiber." Cereal fiber contains compounds which fruit and vegetable fibers do not. Studies that show the various health benefits of whole grains, including possible risk reduction of heart disease, some cancers, type 2 diabetes and stroke (1,2,3).

Separating the whole grains from enriched grains would be very confusing to the public and might send a message that enriched grains are not recommended or important



Sanders 30F6

to a healthy balanced diet. While ABA understands that Americans need to consume more whole grains than they presently do, there is ample scientific evidence that enriched grains have decreased neural tube birth defects, heart disease and stroke (4,5). If people believe they should not consume enriched grains, these diseases would likely increase back to their pre-folic acid fortification levels.

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

ABA agrees that "one size does not fit all" for nutrition guidance but there are some general messages that do provide an umbrella over the entire issue: "Calories Count" and the importance of variety, balance and moderation. Although some consumers profess not to know what moderation means, the majority have enough common sense to fully grasp this concept. The 2005 Dietary Guidelines Advisory Committee continues to stress the importance of flexibility in the individual diet and could also serve as a generalized message.

ABA is hopeful that USDA's consumer research plans are continuing to explore and discover not only what messages resonate, but which ones inspire them to change their behavior. Other groups, such as the Dietary Guidelines Alliance and the U.S. Potato Board have tested messages with adults and children and can be considered for additional guidance.

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

ABA discussed this primarily in Section A, and could support the graphic as a "brand" as long as there are over-arching principles applied for all of the messages. ABA would assume that the Dietary Guidelines Advisory Committee's conclusive statements will be incorporated in the Pyramid messages in an appropriate form.

These messages must be interesting, practical, simple, primarily positive and fun for consumers to take an interest and embrace them. In 1998 and 1999 IFIC conducted focus groups with consumers and discovered that they felt messages that were positive in tone were more likely to be motivating and alleviate confusion about nutrition (6). It is the position of the American Dietetic Association that "Nutrition messages from dietetics professionals can be more effective if they focus on a positive image of healthy food choices over time, rather than individual foods to be avoided" (7).

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

ABA encourages the use of the Internet and CD-ROMs for using the Pyramid messages with children as most of them have access at school or libraries. The low-

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income and elderly, will be the most difficult demographic to reach. Food stamp recipients and seniors may be reached with written materials available through programs such as food stamps, WIC offices and senior federal program centers to further develop communications and understanding in these groups.

The Healthy Eating Index (HEI) appears to be an excellent interactive tool that could be made interesting to all ages with minor modifications. It must also be made easier to find on the Internet. Google searches only pull up an academic document regarding the HEI and not the interactive format. According to Hann et al, "The HEI is a useful tool for describing the overall diet pattern and represents a promising new tool for nutritional epidemiology" (8). A study from Tufts and Harvard reported that women who followed the Dietary Guidelines were less likely to have age-related cataracts, as measured by the Health Eating Index (9).

Food choices will have to be very broad to account for all ethnicities. Activity levels must be spelled out clearly. Many people who think they are "active" actually are "sedentary."

A possible non-internet tool could be a wheel in which the user "dials in" their sex, age and activity level to determine the number of needed calories and number of servings from the Pyramid food groups. The wheel could also include a toll-free number, mailing address or contact information for suggested agencies on food guidance.

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

This is an excellent opportunity for the industry and government to build a successful and productive partnership. Food companies have Web sites that are accessed by children on a regular basis and could either include the CNPP interactive materials or include a link to them.

Food manufacturers have been excellent supporters of the Pyramid by placing it on their packaging, posters, in-store and educational materials. Associations, such as the American Bakers Association, would be enthusiastic about adding the information to their Web sites and educational materials. It is to everyone's advantage - government, private sector and consumers - to get this information out to the public as soon possible to be effective. While to government should factor in the cost of effectively communicating this updated information, private industry and associated trade associations can greatly assist with this task.

This new graphic and accompanying educational materials should be thought of and treated as, a new product introduction. Industry has the expertise and resources to assist in an effective introduction if the government partners with them on communication efforts.

American Bakers Association  
Notice No. 42030  
August 23, 2004  
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Sanders Soft

**In closing, ABA would like to make one final request that does not pertain to any of the six questions posed by USDA, but that is very important to the health of Americans and to the grain based foods industry. Would USDA please make one statement in the document that acknowledges the historical benefits of enriched and fortified grains in the American diet by virtually eliminating beriberi and pellagra; reducing the incidence of neural tube birth defects and iron-deficiency-anemia and lowering the incidence of death from heart disease and strokes? ABA strongly believes that the guidance will not be complete without this important statement.**

Thank you for the opportunity to comment on this important project. ABA welcomes the opportunity to partner with USDA on communications efforts surrounding the revised Food Guide Pyramid graphic.

Sincerely,



Lee Sanders  
Vice President  
Regulatory & Technical Services

**Attachment**

Sanders Bob

#### References:

- 1) J Montonen, P Knekt, R Jarvinen, A Aromaa and A Reumanen. Whole-grain and fiber intake and the incidence of type 2 diabetes. *Am J Clin Nutr.* 2003;77: 622-629.
- 2) E Decker, G Beecher, J Slavin, H E Miller and L Marquart. Whole grains as a source of antioxidants. *Cereal Foods World.* 2002;47(8):370-373.
- 3) D Mozaffarian, S K Kumanyika, R N Lemaitre, J L Olson G L Burke and D S Siscovick. Cereal, fruit, and vegetable fiber intake and the risk of cardiovascular disease in elderly individuals. *J Am Med Assoc.* 2003;289(13):1659-66.
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- 5) K Kratina. *Folic acid. Even better than we thought.* Parker, CO: Wheat Foods Council; 2004.
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- 7) Total diet approach to communicating food and nutrition information: Position of the American Dietetic Association. *J Am Diet Assoc.* 2002; 102:100.
- 8) C S Hann, C L Rock, I King and A Drewnowski. Validation of the Healthy Eating Index with use of plasma biomarkers in a clinical sample of women. *AJCN* 2001; 74: 479 - 486.
- 9) S M Moeller, A Taylor, K L Tucker, M L McCullough, L T Chylack, Jr., S E Hankinson, W C Willett, and P F Jacques. Overall Adherence to the *Dietary Guidelines for Americans* Is Associated with Reduced Prevalence of Early Age-Related Nuclear Lens Opacities in Women. *J Nutr.* 2004 Jul;134 (7):1812-9.



# Council for Responsible Nutrition

AUG 23 2004

• Washington, DC

• fax

*JP*

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August 20, 2004

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

Food Guide Pyramid Reassessment Team:

I was among the presenters at the August 19, 2004, Public Stakeholder's Meeting for the USDA panel reviewing the Food Guide Pyramid and would like to submit my comments for the record.

Thank you,

*Annette Dickinson*

Annette Dickinson, Ph.D.  
President

THE PYRAMID:

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**A VALUABLE TOOL FOR PROVIDING  
GUIDANCE ON DIETARY PATTERNS, DIETARY SUPPLEMENTS,  
PHYSICAL EXERCISE, AND OTHER ASPECTS OF A HEALTHY LIFESTYLE**

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**USDA Public Meeting on the  
Food Guidance System/Food Guide Pyramid  
Washington, D.C.  
August 19, 2004**

**Submitted by  
Annette Dickinson, Ph.D.,  
President Council for Responsible Nutrition  
Washington, D.C.**

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The Food Guide Pyramid is a powerful and flexible tool for consumer information that can be modified in numerous ways to reflect public policy or to embody the views of groups that disagree with current public policy. This power and flexibility is an asset, not a problem, and the existence of numerous modified versions of the pyramid is a testament to its utility and appropriateness in conveying basic concepts. It would be a shame to consign such a valuable tool to the rubbish heap, and the Council for Responsible Nutrition (CRN) urges the Center for Nutrition Policy and Promotion (CNPP) to retain it with appropriate additions or modifications. CRN is a leading trade association for the dietary supplement industry, representing manufacturers of vitamins, minerals, and other ingredients used both in dietary supplements and in conventional foods, and also representing many manufacturers of dietary supplement finished products, including many nationally recognized and respected brands.

We congratulate the CNPP for its current efforts to increase consumer motivation and improve consumer understanding of the latest science-based nutrition guidance regarding the "total diet" -- and for seeking to place that guidance in the context of the "total lifestyle." For about two-thirds of American adults, dietary supplements are an integral part of the total diet and represent just one of the many choices health-conscious people make as part of their overall approach to seeking wellness. Accordingly, dietary supplements should be taken into account in some fashion in the design of a revised pyramid or other graphic approach to diet and lifestyle guidance, along with other elements such as the need for regular physical activity.

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While dietary supplements should never replace efforts to consume the healthiest diet possible, they are a scientifically sound, convenient and affordable way to help ensure that Americans reach their nutrient intake goals. In a society where the majority of us are eating too much, too often, there is a potential danger in ignoring the fact that conventional foods, because they inevitably provide calories as well as nutrients, may not always be the optimum mechanism for increasing the intake of specific nutrients recognized to be in short supply. Supplements of calcium, vitamin D, folic acid, and vitamin B-12 are examples of products that may have particular relevance for many population groups, including women of childbearing age, vegetarians, and the elderly. Multivitamins, on the other hand, would be a valuable addition to a healthy diet for virtually all adults and probably also for most teens and younger children.

Alternative pyramids usefully illustrate a number of approaches to incorporating dietary supplements, physical activity, and other aspects of a healthy lifestyle into the pyramid graphic. For example, the "Healthy Eating Pyramid" developed by Harvard

University sits on a base of Daily Exercise and Weight Control, includes calcium supplements within the pyramid itself as an alternative to dairy products, and features sidebars indicating that multivitamins are recommended for most people and that alcohol should be used only in moderation, unless contraindicated altogether. These concepts are conveyed simply and directly in a manner that is no more complex than the interpretation of the basic Food Guide Pyramid.

Dickinson  
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Scientists at the USDA Human Nutrition Research Center on Aging at Tufts University developed a modified pyramid for the elderly that sits on a base of water to emphasize the need for at least 8 glasses of water daily and that also features a supplement "flag" on top as a reminder that supplements of calcium, vitamin D, and vitamin B-12 may be needed to promote optimal health in the elderly. Naturally, CRN likes the idea of a supplement flag on the pyramid, but this is only one of the graphics that could be used effectively to convey the importance of appropriate supplementation and its role as an integral part of the total diet and a healthy lifestyle.

The pyramid is widely recognized as an icon of nutrition guidance. CRN suggests modification of that icon to reflect the updated advice offered by the Dietary Guidelines Committee regarding conventional food intakes and the inclusion of other healthy lifestyle choices that complement and support good diets. In addition, we urge the CNPP to be open-minded in considering appropriate ways to give consumers realistic and practical advice that includes dietary supplements as a rational tool for increasing nutrient intakes when a hectic lifestyle and the search for weight control combine to undermine the pie-in-the-sky ideal of getting all nutrients from conventional foods.



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Hedgesville, WV  
August 20, 2004

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

Vartanoff / 1 of 1

Dear People:

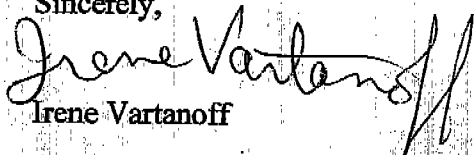
I am glad that you are reassessing the food pyramid. Make protein the largest element!

For the past year and a half, I have been living on a very low carbohydrate diet and it has been wonderful. I stay well under 100 grams per day. And I no longer find myself falling asleep uncontrollably after lunch. I have lots of energy and need less sleep than previously. I am not prey to cravings for junk foods. I have lost at least 60 pounds, but more significantly, my good cholesterol is up significantly. My sugar levels, of great concern to me because of a family history of diabetes, are completely within the normal range. This is despite the fact that I am still technically "very obese."

In the 1980s, following government urgings to add carbs to my life, I dutifully put pasta on my menu. I haven't been anything like skinny since. Now that I eschew pasta like the plague, I am in normal size clothes for the first time in 20 years. Is there a significant connection? I believe there is.

Instead of a possibly dangerous miracle drug, I am using a logical and safe approach to nutrition based on the sugar impact of what I eat. The significant side effect is joy.

Sincerely,

  
Irene Vartanoff

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Aug. 20/04  
AUG 23 2004

To: Food Guide Reassessment team: Rudan  
10F6

I have been a teacher  
of Foods & Nutrition for over  
45 years.

I have never approved  
or agreed with the FOOD  
GUIDE PYRAMID: never  
<sup>put</sup> weigh one food group over  
another; all contain valuable <sup>nutrients</sup> ~~nutrients~~

I have enclosed the  
"PIE" FOOD GUIDE which is a  
balance of all the 4 Food Groups,  
a summary of the "Pie" Food  
(over)

Rudan

2 of 6

guide and a brochure  
giving reasons to follow  
a Four Food Guide  
Plan.

I would appreciate  
hearing from someone  
on your committee.

Thank you  
Doreen J Rudan

Ithaca, NY

Reasons for  
the 4 Food Group  
"BALANCE!"



# SUMMARY: "Pie Guide"

II

## PORTIONS

Ruden

4 of 6

- drink 4 oz juice
- fruit: apple, banana, peach
- salad - veggies, potatoes
- 2-3 glasses milk
- $\frac{1}{2}$  c yogurt, ice cream, cheese chunk
- whole wht bread, cereal
- 3-4 oz lean meat (chicken, beef, pork)
- " fish
- beans, peanuts, nuts, peanut butter

## III PLATE SIZE

for breakfast - bread & butter plate  
or cereal bowl

for lunch - bread & butter plate  
or dessert bowl

for dinner - luncheon plate & small  
(9") salad bowl

## IV POUNDS

- keep a scale in the bathroom
- weigh yourself every 2 or 3 days
- Achieve a comfortable weight and maintain a constant weight

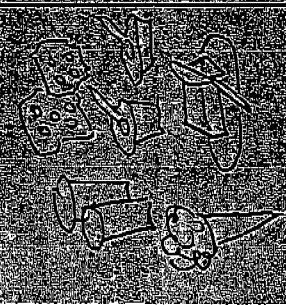
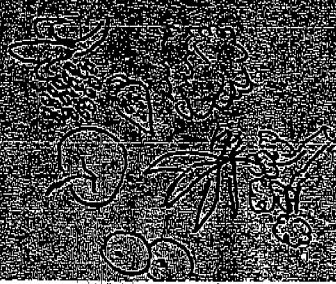
EXERCISE - walk, jog, dance,  
sports

D. Ruden  
Johanna, NY

BRUNN 2016

# BACK TO THE BASICS

## FOUR FOOD GROUPS



## THE 7 FOOD GROUP

(Basic Balance)  
Go to dark food choices  
(BREAKFAST LUNCH DINNER)

Grains, Beans, Fruit, Dairy, Protein, Veg, Oils

Grains: Bread, Cereal, Pasta, Rice, Potatoes

Beans: Lentils, Chickpeas, Kidney Beans, Tofu

Fruit: Apples, Bananas, Berries, Citrus

Dairy: Milk, Yogurt, Cheese

Protein: Eggs, Meat, Fish, Nuts

Veg: Spinach, Broccoli, Carrots, Peas

Oils: Olive, Canola, Avocado

Protein: Eggs, Meat, Fish, Nuts

Grains: Bread, Cereal, Pasta, Rice, Potatoes

Beans: Lentils, Chickpeas, Kidney Beans, Tofu

Fruit: Apples, Bananas, Berries, Citrus

Dairy: Milk, Yogurt, Cheese

Protein: Eggs, Meat, Fish, Nuts

Veg: Spinach, Broccoli, Carrots, Peas

Oils: Olive, Canola, Avocado

Protein: Eggs, Meat, Fish, Nuts

Grains: Bread, Cereal, Pasta, Rice, Potatoes

Beans: Lentils, Chickpeas, Kidney Beans, Tofu

Fruit: Apples, Bananas, Berries, Citrus

Dairy: Milk, Yogurt, Cheese

Protein: Eggs, Meat, Fish, Nuts

Veg: Spinach, Broccoli, Carrots, Peas

Oils: Olive, Canola, Avocado

Protein: Eggs, Meat, Fish, Nuts

Grains: Bread, Cereal, Pasta, Rice, Potatoes

Menu planning for

three nourishing meals

every day

How Much is One (normal) Serving

Grains: 1/2 cup cooked rice or pasta

Beans: 1/2 cup cooked beans

Fruit: 1 medium fruit

Dairy: 1 cup milk or yogurt

Protein: 3 oz meat, fish, or poultry

Veg: 1/2 cup cooked or 1 cup raw

Oils: 1/2 to 1 tsp

Protein: 3 oz meat, fish, or poultry

Grains: 1/2 cup cooked rice or pasta

Beans: 1/2 cup cooked beans

Fruit: 1 medium fruit

Dairy: 1 cup milk or yogurt

Protein: 3 oz meat, fish, or poultry

Veg: 1/2 cup cooked or 1 cup raw

Oils: 1/2 to 1 tsp

Protein: 3 oz meat, fish, or poultry

Grains: 1/2 cup cooked rice or pasta

Beans: 1/2 cup cooked beans

Fruit: 1 medium fruit

# QUEST PLANNING THE REALITY OF THE

1) THE REALITY OF THE BASIC FOOD GROUPS  
The reality of the basic food groups is a concept that is often misunderstood. It is not simply a list of foods to eat, but a way of thinking about food that emphasizes variety and balance. The reality of the basic food groups is that they are not just a list of foods, but a way of thinking about food that emphasizes variety and balance.

2) STRESS  
Stress is a natural part of life, but it can become a problem when it is constant and overwhelming. Stress can lead to a variety of health problems, including high blood pressure, heart disease, and depression. It is important to find ways to manage stress, such as exercise, meditation, and talking to a therapist.

3) DIET  
Diet is a complex topic that involves many factors, including genetics, environment, and lifestyle. There is no one-size-fits-all diet, and it is important to find a diet that works for you. A healthy diet should be balanced and include a variety of foods from all food groups.

4) EXERCISE  
Exercise is an important part of a healthy lifestyle. It can help to improve your mood, reduce stress, and improve your overall health. There are many different types of exercise, and it is important to find one that you enjoy and can stick to.

5) MENTAL HEALTH  
Mental health is just as important as physical health. It is important to take care of your mental health by getting enough sleep, eating a healthy diet, and exercising. If you are having trouble with your mental health, it is important to talk to a therapist.

6) RELATIONSHIPS  
Relationships are an important part of life, and they can have a big impact on your health. It is important to have healthy relationships with the people you care about. This means being honest, respectful, and supportive.

Study

AUG 23 2004

*SC*

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

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Costello (1 of 2)

RE: COMMENTS ON FOOD PYRAMID REVISION

The quality of the American diet has not improved in the years since the food pyramid was introduced. One reason for this is, I believe, that the pyramid represents a *static* concept of balance that most people find difficult to translate into *actions* when presented with food choices on a day-to-day, meal-to-meal, snack-to-snack basis.

I suggest that the new graphics and materials be constructed to present *clear limits on certain food categories* and a *bias towards action*.

**Clear limits on certain food categories:** The food pyramid is built on a philosophy that all foods are "good" as long as the overall balance is proper. Unfortunately, many people have difficulty making the choices that would lead to a properly balanced diet. It would be helpful to *specify clear limits on certain kinds of foods*. For example, it is probably unhealthy to have two servings of fried food per day, such as a doughnut for breakfast and French fries with lunch, yet I know several people who do just this every day. I suggest that the USDA create a few rules along this line to help people make better choices.

**Bias towards action:** The *use of arrows* is a good graphic device for showing transition from one state to another. In my example graphic, I have used arrows to represent key transitions from a poor diet to a good one: Reduce total fat, reduce saturated and trans fats, cut portion sizes, reduce added sugar and salt, and add fiber.

The attached example graphic is provided to show these two concepts. Note that example is laid out in a columnar fashion such that each column could be used independently of the others. The nutritional advice is illustrative only—I ask that you focus on the communication and graphics concepts. I am not a trained expert in nutrition, and such details must be left to the experts.

Sincerely,

*Scott Costello*  
Scott Costello

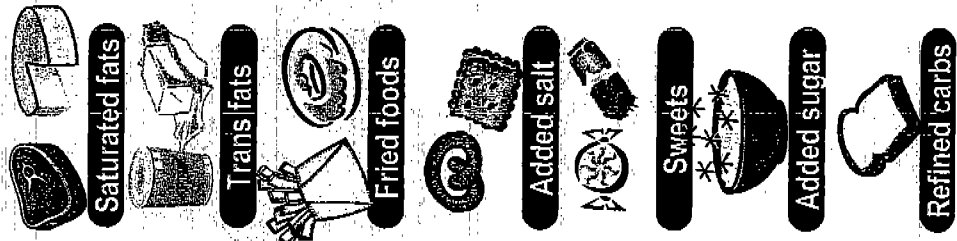
Attachment: Example graphic



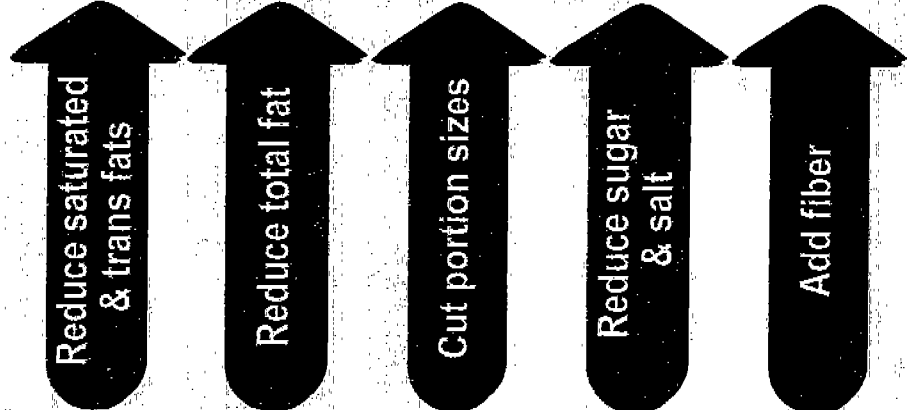
**RECOMMENDED LIMITS**

- **Portion size:** do not exceed serving size on package, especially for foods in the limited category.
- **Fried foods:** no more than xx servings per day
- **Saturated fats:** xxx
- **Trans fats:** xxx
- **Salt:** xxx
- **Sugar:** xxx
- **Refined carbs (white flour based):** xxx

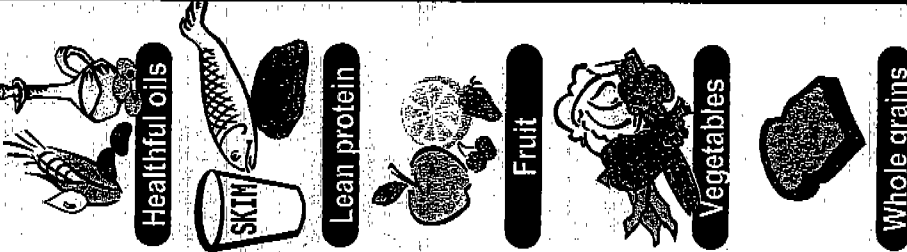
**LIMIT THESE**



**TAKE ACTION!**



**EAT MORE OF THESE**



**RECOMMENDED DAILY BALANCE**

- Bread, cereal, rice & pasta: 6-11 servings
- Fruits: 2-4 servings
- vegetables: 3-5 servings
- Milk, yogurt, cheese: 2-3 servings
- Meat, poultry, fish, dry beans, eggs & nuts: 2-3 servings

Costello P or J

Example graphic submitted by Scott Costello, White Bear Lake, Minnesota. Key concepts: (1) explicit identification of foods and quantities to be limited in a healthful diet, and (2) use of arrows to indicate desired transition and course of action. The nutritional advice is illustrative only—the reader is asked to consider the communication concepts.

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Colman 1 of 1

Paul M. Colman

Springfield, VA

20 August 2004

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

To Whom it May Concern,

My name is Paul Colman and I'm writing to share my thoughts on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to regain control of my health and my weight.

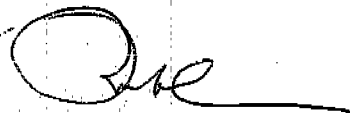
In my youth, I was a short 5'4" male who always gained weight for no apparent reason. By the time I was 28, I weighed nearly 230 pounds, and was nearly a hospital case. No diets I tried ever work until I discovered Atkins. Even in the swirl of big industry lobbying against the diet, I went on the diet and it worked instantly. As the nutrition aspects of the diet were developed in the 1970s and 1980s, I followed them religiously, and lost 85 pounds.

More important, when on the diet, I always feel better and more energetic.

My comments are as follows: please carefully consider controlled and use of only nutritionally self-sustaining carbohydrates in your work.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,



Paul Colman

AUG 23 2004

**Marcia L. Roupe**

Mailing: Johnston, IA  
Home: Norwalk, IA  
Phone and Fax:

July 30, 2004

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

To Whom it May Concern,

I am writing to share my thoughts and experience on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to regain control of my health and my weight.

I am now age 55 and have had a weight problem for most of my adult years since bearing children – nothing too serious, but I am very health, exercise and nutrition conscious. I tried most every diet that came along during the 80's and 90's, and followed the Government's food pyramid guidelines. Nothing worked, so I was fortunate to have experienced no yo-yo effect. I began doing the Atkins Diet in 2002 and experienced a very satisfying weight loss and improved health in the areas of blood lipids, lean to fat ratio and chronic acid reflux disease. Within four days of restricting my carbohydrate intake, I no longer needed any medication for the acid reflux disease, and I lost the 40 pounds within 3 months. My personal physician has marveled at my blood lipids, blood pressure and general health and urged me to continue doing what I have been doing, which is restricting my carbohydrate intake to fresh green vegetables and other low carbohydrate vegetables. I eat a variety of meat – beef, pork, fowl and fish, and I don't skimp on the beef at all. I get plenty of fiber in the vegetables that I choose.

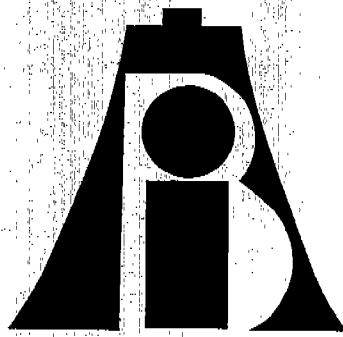
I urge you to reconsider revamping the food pyramid to include the increased consumption of protein and healthy fats, and decrease the consumption of "white" carbohydrates drastically by encouraging the consumption of healthy vegetables and fruits and whole-grain products. I also urge you to not be influenced by special interest groups who may lobby against the low-carb lifestyle because they may profit from selling nutritionless products or wish to stop the consumption of animal products.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,

Marcia L. Roupe

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Roupe 1 of 1



AUG 23 2004

*[Handwritten signature]*

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Pyle 1 of 3

## INDEPENDENT BAKERS ASSOCIATION

• Washington, DC •

August 20, 2004

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

Dear Food Guide Pyramid Reassessment Team:

Thank you for the opportunity to comment on the Food Guide Pyramid graphic. The Independent Bakers Association is a national trade association of over 400 mostly family owned wholesale bakeries and allied industry trades. The follow details IBA's input on the six areas where you requested guidance:

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

The familiar graphic representation of the Dietary Guidelines, "Food Guide Pyramid," has been effective in compressing a large amount of information from the Guidelines into a useful and understandable image for the American public. The current Pyramid is an excellent educational depiction that relates the types and amounts of nutritious foods Americans should intake. The Pyramid demonstrates a balance of all food groups that consumers should consider in their overall dietary patterns. The level of recognition for the pyramid is over 80 percent and should not be squandered in an effort to make "change."

It has not been a very successful educational tool since it is estimated that less than 10 percent of Americans actually follow the Pyramid recommendations. With the ever-increasing obesity epidemic in America, the Pyramid is more important than ever. The government has been criticized because of the erroneous public perception that the Pyramid recommendation has caused obesity, it would not be prudent to change the shape

and reinforce that perception. This would only reaffirm, in some minds, that the dietary advice given since 1992 was wrong. A substitute graphic would take years to reach the same level of public awareness as the Pyramid. The answer is better education by the government and groups such as the Ad Council for the value of the Pyramid.

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

The Pyramid is a motivational instrument for Americans to make healthy food choices and follows the Dietary Guidelines Recommendations. It is a symbol of choice, moderation, and variety. It is important that the grains group remain at the bottom of the Pyramid. Research has shown that grain foods are needed to provide B vitamins, including folic acid, iron, fiber and numerous other vitamins and minerals. In addition, they are inexpensive, convenient, easy-to-store, popular, and hold a predominant place in the diet of nearly all cultures.

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

One size does not fit all for nutrition guidance but there are some general messages that do provide an umbrella over the entire issue of nutrition, including that calories do count plus the importance of variety, balance and moderation in American diets. The 2005 Dietary Guidelines Advisory Committee continues to stress the importance of flexibility in the diet for each individual. We trust your consumer research continues to explore and discover not only what messages resonate, but also which ones inspire changes in consumer eating behaviors using the Pyramid as the accepted graphic.

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

The messages must be fun, interesting, practical, simple and primarily positive. Positive messages are more likely to be motivating and avoid confusion about nutrition. Nutrition messages can be more effective if they focus on a positive image of healthy food choices, rather than individual foods to be avoided.

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

We applaud the use of the Internet and CD-ROMs for using the Pyramid messages for children as most of them have access at school or libraries. Food stamp recipients and seniors may be reached with written materials including posters. Educational materials are available with food stamps, at WIC offices and senior federal program centers.

Pyle 30-3

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

This is an excellent opportunity for the industry and government to build a successful partnership. Bakers are strong supporters of the Pyramid and place the logo on their packaging, posters, vehicles, and on educational materials at bakery store shelves.

In closing, IBA recommends retaining the Pyramid graphic, but increasing efforts to educate the public on its value. To change the graphic would leave a void during the lengthy introduction of a substitute. Build on what we have now through greater education. That is our message.

Thank you for the opportunity to comment and please be assured the Independent Bakers Association is eager to collaborate with you in support of the Pyramid.

Sincerely,



Nicholas A. Pyle  
President

cc: IBA Board of Directors

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AUG 23 2004

Breland

1 of 1

August 20, 2004

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

Dear Sirs:

I understand that there is discussion underway to change the Food Guide Pyramid to a different configuration. As an educator who has worked with Head Start, the public schools, and the general public, I can assure you that changing the design of the pyramid is not going to change eating habits. The only reason to make any change is if there is a major area that is incorrect nutritionally.

In my office I have a dozen different curriculums to help teach the Food Guide Pyramid. I suggest that people use the pyramid on the containers in the food stores to look at their serving needs. Are we going now to have to revamp all of the current curriculum on our shelves? Ask companies to change the packaging? Do we tell the children who have been drilled in the Pyramid that now we have to unlearn and relearn? It was bad enough when we changed from 5 food groups to the Pyramid, particularly when part of the rationalization was that it was too hard to remember 5 food groups. I have lived through 7 food groups, 4 food groups, 5 food groups, and now the Pyramid. I can't say that the design made any major difference in my learning to eat nutritionally. I ate nutritionally because my mother cooked balanced meals and taught me to do the same for my family.

If there is solid research showing that using the pyramid is incorrect, then it needs changing. If not, it works well as it is. Changing the shape of the pyramid is not what motivates people to change their food habits. It is currently a good tool. A change without scientific research that indicates a need for the change is a major waste of time, talent, and a great deal of money.

Sincerely,



Judith Edwards Breland, Ph.D., CFCS

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AUG 23 2004  
JY

Richard Green

Frankfort, KY  
August 20, 2004

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

Green  
1 of 3

Dear Reviewers:

I find the food pyramid very helpful. After retirement I started gaining weight so made a schematic based on your pyramid that is easy to use. I have had no trouble using it daily during the past three years. It has improved my eating habits 100% and kept my weight between 128 and 134 pounds. I had weighed as much as 154 pounds. (I am 60 years old and 5'5" in height.)

I am enclosing (1.) a blank schematic that gets cut into eight pocket-size charts and (2.) an example of some that have been filled out. "WGT" stands for weight exercises and gets circled when I do them. "EXR" stands for aerobics, swimming laps, walking etc. and again gets circled if I engage in such activities. These are gentle reminders of the need to MOVE.

On the filled out charts, "B" indicates what I servings I ate for BREAKFAST, "L" what I had for LUNCH and "S" what I had for supper. I count deserts, snacks etc. on this chart to get a complete picture of how close my intake is to the pyramid recommendations.

A blank chart goes in my pocket each morning and I simply fill it in as I eat during the day. By glancing at it before eating, I know what types of foods I should prepare or order.

I hope you find this system of use for others having a hard time managing their food intake. Best wishes for your continued success and in your reassessment of the pyramid.

Sincerely,



Richard Green



Date:

Green  
2 of 3

Date:

FATS / SWEETS

FATS / SWEETS

MILK / DAIRY - 2 or 3

MILK / DAIRY - 2 or 3

MEATS - 2 or 3

WGT

MEATS - 2 or 3

WGT

FRUITS - 3 or 4

FRUITS - 3 or 4

VEGETABLES (non-starchy) - 4

EXR

VEGETABLES (non-starchy) - 4

EXR

GRAINS / BEANS / PEAS - 6  
CORN / POTATOES

GRAINS / BEANS / PEAS - 6  
CORN / POTATOES

WATER - 8

WATER - 8

Date:

Date:

FATS / SWEETS

FATS / SWEETS

MILK / DAIRY - 2 or 3

MILK / DAIRY - 2 or 3

MEATS - 2 or 3

WGT

MEATS - 2 or 3

WGT

FRUITS - 3 or 4

FRUITS - 3 or 4

VEGETABLES (non-starchy) - 4

EXR

VEGETABLES (non-starchy) - 4

EXR

GRAINS / BEANS / PEAS - 6  
CORN / POTATOES

GRAINS / BEANS / PEAS - 6  
CORN / POTATOES

WATER - 8

WATER - 8

Date:

Date:

FATS / SWEETS

FATS / SWEETS

MILK / DAIRY - 2 or 3

MILK / DAIRY - 2 or 3

MEATS - 2 or 3

WGT

MEATS - 2 or 3

WGT

FRUITS - 3 or 4

FRUITS - 3 or 4

VEGETABLES (non-starchy) - 4

EXR

VEGETABLES (non-starchy) - 4

EXR

GRAINS / BEANS / PEAS - 6  
CORN / POTATOES

GRAINS / BEANS / PEAS - 6  
CORN / POTATOES

WATER - 8

WATER - 8

Date:

Date:

FATS / SWEETS

FATS / SWEETS

MILK / DAIRY - 2 or 3

MILK / DAIRY - 2 or 3

MEATS - 2 or 3

WGT

MEATS - 2 or 3

WGT

FRUITS - 3 or 4

FRUITS - 3 or 4

VEGETABLES (non-starchy) - 4

EXR

VEGETABLES (non-starchy) - 4

EXR

GRAINS / BEANS / PEAS - 6  
CORN / POTATOES

GRAINS / BEANS / PEAS - 6  
CORN / POTATOES

WATER - 8

WATER - 8

8-19

Green  
3 of 3

FATS/SWEETS

L L L L  
L L L L  
L L L L S

MILK/DAIRY - 2 or 3

MEATS - 2 or 3

FRUITS - 3 or 4

VEGETABLES (non-starchy) - 4

GRAINS/BEANS/PEAS - 6

CORN/POTATOES

WATER - 8

L S  
B S  
L S S  
(B B) (L S)  
(S S S)

WGT

EXR

Date: 8-20

FATS/SWEETS

MILK/DAIRY - 2 or 3

MEATS - 2 or 3

FRUITS - 3 or 4

VEGETABLES (non-starchy) - 4

GRAINS/BEANS/PEAS - 6

CORN/POTATOES

WATER - 8

L  
L L  
L  
L L L  
(L L L)  
B L L

WGT

EXR

S S S S S S S S 8-17

FATS/SWEETS

MILK/DAIRY - 2 or 3

MEATS - 2 or 3

FRUITS - 3 or 4

VEGETABLES (non-starchy) - 4

GRAINS/BEANS/PEAS - 6

CORN/POTATOES

WATER - 8

L L L L L S S S  
B 1/2  
L S  
B L  
L L S S  
(B B) (S S S) S S S  
(B B B) (L L S S S)

WGT

EXR

FATS/SWEETS

MILK/DAIRY - 2 or 3

MEATS - 2 or 3

FRUITS - 3 or 4

VEGETABLES (non-starchy) - 4

GRAINS/BEANS/PEAS - 6

CORN/POTATOES

WATER - 8

B B L L S  
B L L  
S S  
B L  
L L L S  
(L L L) (L S)  
(B B B) L L

8-18

WGT

EXR

FATS/SWEETS

MILK/DAIRY - 2 or 3

MEATS - 2 or 3

FRUITS - 3 or 4

VEGETABLES (non-starchy) - 4

GRAINS/BEANS/PEAS - 6

CORN/POTATOES

WATER - 8

B B B L L L L 8-2  
1/2 L S  
L  
L S S S  
L L L  
(B B L) (S S S)  
(B B L) (L S S S)

WGT

EXR

FATS/SWEETS

MILK/DAIRY - 2 or 3

MEATS - 2 or 3

FRUITS - 3 or 4

VEGETABLES (non-starchy) - 4

GRAINS/BEANS/PEAS - 6

CORN/POTATOES

WATER - 8

L S  
B S  
L S  
L  
L L L L / S S S  
(B B B) (L S S S)  
(B B B) L L

8-4

WGT

EXR

211

AUG 23 2004

*[Handwritten initials]*

Gibson 1 of 1

AUGUST 20, 2004

FOOD GUIDE PYRAMID REASSESSMENT TEAM  
USDA CENTER FOR NUTRITION POLICY AND PROMOTION  
3101 PARK CENTER DRIVE, ROOM 1034  
ALEXANDRIA, VA 22302

WHEN UPDATING THE PYRAMID, PLEASE ADDRESS THE "CARB" CONFUSION. EVERYTHING SAYS DON'T EAT CARBS, BUT ACCORDING TO THE PYRAMID YOU ARE TO HAVE THE MOST SERVINGS OF CARBS. I REALIZE THAT MODERATION IS THE KEY AND THAT YOUR BODY NEEDS FOOD FROM ALL OF THE FOOD GROUPS. HOWEVER, IF THE INTAKE OF CARBS SHOULD BE LOWER IT WOULD BE HELPFUL ESPECIALLY FOR CHILDREN TO SEE THAT ON THE PYRAMID.

THANK YOU SO MUCH.

*Katrina Gibson*  
KATRINA GIBSON

UNIONTOWN OH

AUG 23 2004

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Peters 1 of 1

Audrey R Peters

Auburn, WA  
August 18, 2004

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

To Whom it May Concern,

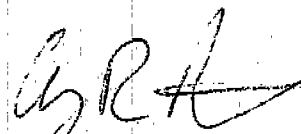
My name is Audrey Peters and I'm writing to share my thoughts on the USDA Food Guide Pyramid. My comments are based on my experience controlling carbohydrates, which have helped me to regain control of my health and my weight.

Over four and a half years ago I discovered low-carb eating. I have always had a problem with my weight. After reading Dr Atkins book I went into the kitchen, boxed up all of my carbs and haven't looked back since. I now have a trim body, more consistent moods and my nearly monthly headaches have all but ceased.

My comments are as follows: The evidence of my own transformation and many others I have been able to convert to the low carb way of eating is astonishing. We were meant to eat the foods given to us by nature such as meat, nuts, greens and berries. Our bodies were not intended to process sugar, flour and white rice. Fats are necessary for transportation of nutrients throughout the body. Telling people to eat low fat foods is hurting the public. Suggesting that they can eat sugar and flour with reckless abandon is creating a population of overweight diabetics. I realize that this is a large responsibility for the USDA in an economic sense as products that contain sugar and flour are large money producers for the food industry. Please recognize that reduction of these foods in the American diet will create a healthier and happier population and will start to decrease the overwhelming numbers of diabetics.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,



Audrey R Peters

AUG 23 2004

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*[Handwritten initials]*

Debra Ekdahl

Taft, CA  
8-19-2004

Ekdahl 1 of 1

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,

My name is Debra Ekdahl and I'm writing to share my experience with the current USDA Food Guide Pyramid. My comments are based on my experience of working the pyramid, seeing the results and now controlling carbohydrates, which has helped me to improve my health and weight.

For the six years prior to this one I was on a very low fat vegetarian diet following the Food Guide Pyramid as the absolute source for diet and nutrition. I ballooned up to 210 pounds doing this.

I started working the Atkins Program January 1<sup>st</sup> of this year. My total cholesterol has gone down, my bad cholesterol has gone down and my triglycerides have gone down. I have gone from 210 to 167 and will continue on with this program. I have more energy, sleep better and feel better than I have in years. My doctor is very happy with the improvements I am making.

Please take these comments into consideration as you re-evaluate and redesign the Food Guide Pyramid.

Sincerely,  
Debra Ekdahl