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Pontotoc County OSU Extension Office

Ada, OK
August 23, 2004

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 following contains written comments on the proposed changes in the Food Guide Pyramid. These comments are from a group of 2 individuals who teach from the FGP a minimum of 25 hours per week, a senior college student majoring in dietetics, and a Dietitian who is their supervisor. We are a part of the Food Stamp Nutrition Education Program and EFNEP (Expanded Food and Nutrition Education Program) serving adults and youth with low incomes in Southeastern Oklahoma. Please find more information about our program enclosed with this letter.

We submit this without scientific information as we feel that what we can best provide is the insight into our experiences in teaching hard to reach audiences and what our observations have been about their ability and readiness to learn using the FGP.

We would be willing to pilot the use of the new FGP or assist in its development in any way possible. The FGP is the backbone of our education program and we deeply care about how functional and effective the information is.

The following comments came from a brain storming session on August 18, 2004:

1. If the graphic is changed how much time will be devoted to explaining the new graphic? It seems that more teachers each year are teaching the FGP and would that momentum be lost?
2. If you do NOT change the graphic – how will people know that it has changed significantly? We feel this is less of a consideration as it can be changed in colors used, etc.
3. If you are going to change the graph we recommend a circle (pie chart, no pun intended) as an option that people can view what part of the circle each food should have in a diet. Also, it resembles a plate and that could show what part of a plate the food groups should occupy at the meal. We thought of the slogan of "Food Guide: Circle for Life" which is quite like the Lion King – but it is catchy.

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4. We feel that we need a simple one page tool to teach the Food Guide Pyramid with enough information to get the person started down the learning path. However, the Level 1 materials sound great to have a CD, etc. to go further into individualizing the information. The growing elderly population does not have access to the internet and we feel that the written information will be important to educating them.
5. There needs to be a self-guided "train the trainer" package that is written at a high school and then professional level. There are many paraprofessionals that teach the FGP that will need to be learning the new format in a consistent manner.
6. The current FGP is not a stand alone education resource as we have to spend several hours to explain portion size, etc. to our participants. We do not expect the new guide to be different – but more than a logo is needed to begin the education process.
7. Doctors' offices are an avenue that does not have the FGP displayed with any frequency. We feel this is an avenue that should be revisited when the new guide is released. The training module could be utilized by the physicians and their staff.
8. With a generation of non-cooks we feel that simple cooking videos/CDs and simple (few words and lots of pictures) would help us educate our participants. Highlighting the USDA cookbook would build on what already exists

It seems to be the consensus that you are on the right track with the plans for the new Food Guide and its supporting documents as explained in the July 13, 2004 Federal Register.

We hope that the above information is helpful in a practical manner. We understand it is anecdotal in nature and may not meet your needs in many ways. However, we are a group that actually uses the FGP and want to give you our opinions.

Again, if we can be of assistance in any manner please do not hesitate to call upon us. We have assisted in field testing of materials for The American Diabetic Association and found that there is much to be gained by participating in the development of educational materials.

Thank you for your dedication and your willingness to be open to input.

Respectfully submitted,

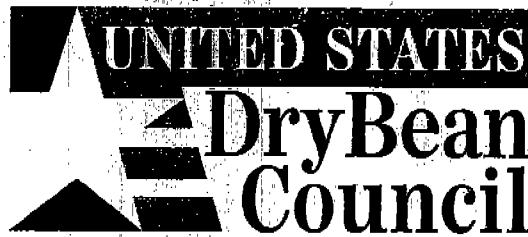
Signature Page:

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Cindy Kesler, NEA
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Rhonda Skelton
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August 24, 2004

Mr. Eric J. Hentges
Executive Director
USDA Center for Nutrition Policy and Promotion
3101 Park Center Drive, Room 1034
Alexandria, VA 22302

Sindt 1 of 3

RE: FR Doc 04-15710 Notice of Proposal for Food Guide Graphic
Presentation and Consumer Education Materials

Dear Mr. Hentges:

Thank you for the opportunity to present comments on the food guide graphic and educational materials on behalf of the membership of the United States Dry Bean Council. The USDBC is a private trade association that represents U.S. growers and shippers of dry beans. The USDBC is the primary resource for information on the US trade in dry beans, dry bean classes, trade policy issues, and the role of US beans in international food aid efforts.

At the outset of our comments, we should note our strong support for continued recognition of the multiple health and nutritional qualities of dry beans. Dry beans have long had an important place in the U.S. diet and are recognized as being a healthy whole food. Dry beans are low in fat, sodium and cholesterol, and are a good source of protein, fiber, vitamins, minerals, and complex carbohydrates. Dry beans are now recognized as significant components of the present food pyramid and guidance system. We would urge this continued recognition, and consideration to an enhanced standing, of dry beans in any new graphic and materials adopted.

The balance of our comments relate to the use of terminology in this process, specifically use of the term "beans" instead of "dry beans" or "legumes" in the messaging and tools developed for the food guidance system. The USDBC is concerned that using the term "legumes" in supporting educational materials is confusing and inconsistent.

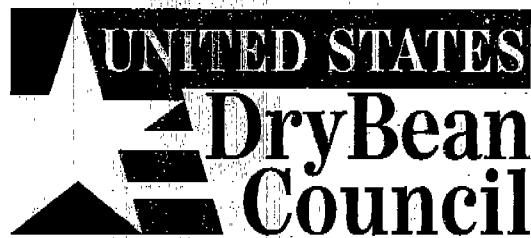
USDBC supports using the term "beans" in the proposed pyramid graphic as a subgroup of the Meat and Beans Group. We note that your background materials place dry beans in the legumes subgroup in vegetables. As your background information notes, legumes include dry beans, lentils, peas, and peanuts.

, Grapeview, Washington

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Beans is the term most commonly used by consumers to refer to individual types of beans such as black beans, pinto beans, kidney beans and others. We believe "beans" should be used in the food guidance system to refer to these foods. The term "beans" is one that consumers readily recognize when referring to dry beans (whether dry in a bag or further processed.)

Supporting Consumer Research

Beans (not Dry Beans)

Results of a recent consumer research study, sponsored by Bush Brothers & Company, showed that 70% of consumers believe that the key difference between "dry beans" and "beans" is whether or not they have been processed. When asked to describe "dry beans", 35% of consumers mentioned a specific type of bean (i.e., pinto, black, chili) or simply said "beans."

We believe these data conclude that consumers do not commonly use the term dry beans to describe the entire food category and that the term "beans" is more commonly used and represents all beans - dry in a bag or further processed. Proper consumer guidance should suggest that consumption of all beans, processed or not, are important to include in a healthy diet.

Beans (not Legumes)

This consumer research study also concluded that consumers lack understanding of the definition, and which foods constitute, the category of foods referred to as "legumes". The study shows consumers would better understand this category if a more common reference was used, such as "beans".

The data showed that when consumers were read a list of several different foods a stronger association was made with the term "Beans" versus the term "Legumes". For example, 80% of consumers tested identified pinto beans as a dry bean, compared to only 60% who associated pinto beans with the term legumes. Similar results were found for black beans (76% versus 57%) and kidney beans (71% versus 62%).

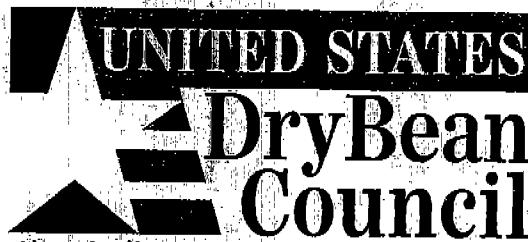
Less than 40% of respondents identified peanuts and green peas as legumes and about 16% identified zucchini, squash, pumpkins and potatoes as

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legumes. This is a further indication that the term does not effectively communicate which foods are classified as legumes, and that it is providing poor consumer dietary guidance.

Study Background

These data were collected through two omnibus studies among separate, but nationally representative samples of 500 consumers in the continental United States. One sample was asked questions about dry beans and pulses. The other sample was asked questions about legumes and pulses. The resulting data sets were weighted to reflect national percentages. The range of error on a sample of 500 is plus or minus 4.4%. A copy of the supporting test data can be made available upon request.

Consequently, based on our concern for clear consumer understanding in making dietary choices, the USDBC recommends using the term "beans" instead of "dry beans" or "legumes" in the messaging and tools developed for the food guidance system. The term "beans" is one that consumers readily recognize when referring to dry beans (whether dry in a bag or further processed.) It is USDBC's position that proper consumer guidance should reflect that consumption of all beans, whether processed or not, is important to include in a healthy diet.

Thank you for the opportunity to submit these comments and for your consideration of them.

Sincerely,

A handwritten signature in cursive script that reads "Robert H. Sindt".

Robert H. Sindt
Government Affairs Liaison, USDBC

RHS/bs

Grapeview, Washington

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August 24, 2004

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

Comments on the Center for Nutrition Policy and Promotion: Notice of Proposal for Food Guide Graphic Presentation and Consumer Education Materials

Opportunity for Public Comment
(*Federal Register*, Vol. 69, No. 133, July 13, 2004)

To the Reassessment Team:

As Registered Dietitians working in public relations and marketing with food industry clients, we appreciate this opportunity to respond to the United States Department of Agriculture's (USDA) request for comments on the Food Guide Pyramid Presentation and accompanying Consumer Education Materials. The Notice requests comments in six key areas, and also invites voluntary responders' views on all aspects of the Food Guidance System.

We are members of the American Dietetic Association, Institute of Food Technologists, International Association of Culinary Professionals, International Foodservice Editorial Council, and the Society of Nutrition Education, among other of our memberships in professional organizations. We believe that for professional health and food and nutrition educators, as well as for consumers, the Food Guide "system" is an important education tool and should be evaluated continually to measure effectiveness of the graphic, the messages, the nomenclature of the included foods, and its reach to consumers and use by professionals.

Our principal comments relate to consumer understanding, the fundamental aspect of the Food Guidance System. As professional nutrition educators, we believe that, to be effective, all information provided to guide and influence consumer dietary choices must be presented in simple consumer language and graphics.

- We support the use of a government-promoted graphic to communicate nutrition guidelines and that serves as an educational tool to provide an overview of healthful eating.
- We do *not* support a graphic or logo that solely "brands" the national food guidance system without it serving as an educational tool. Only a symbol, without the necessary educational message to complement it, would further require developing multiple approaches and applications, which, in turn, would most likely result in public confusion, misuse and misinterpretation.

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- As educators, we encourage consistency among the food guidance system, the *Dietary Guidelines for Americans*, and the FDA's Nutrition Facts system.
- We support the inclusion of core messages that are actionable and translatable to other languages frequently spoken and appropriate to those cultures represented here in the United States.

Specifically, and pertaining to this last point, we work with the Beans for Health Alliance (BHA), a non-profit organization whose goal is to unite bean enthusiasts around the world to fund research and to promote the health benefits of beans and other pulses. While in-the-field research is underway in Africa, we also have launched an English language (to be followed by French- and Spanish-language versions) website at www.beansforhealth.org.

The BHA was established in 2003 and officially designated the International Alliance to Promote the Health Benefits of Dry Beans and Other Pulses. The BHA is supported partially by a two-year \$1.5 million U.S. Agency for International Development (USAID) Global Development Alliance grant. BHA members include national and state dry bean boards, dry bean growers, packers, shippers, distributors, bean manufacturers, as well as non-governmental organizations such as Catholic Relief Services.

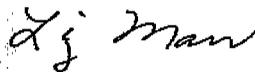
Via research provided by our BHA client, and through our professional consumer education experience both at Dairy Council (Liz Marr) and the Good Housekeeping Institute, *Good Housekeeping* magazine and *McCall's* magazine (Amy Barr) as well as extensive consulting experience for numerous major food and beverage companies, we know that in traditional home economics-type recipes, consumers do not understand a term such as "legumes." It is not a commonly-used term in American households. In addition, consumers do not understand the term "dried beans," since such foods are not typically purchased "dry," but instead, are canned and packed in liquids. In summary, U.S. consumers, whether they be Anglo-Saxon, African-American or from the Spanish, Asian and Caribbean Island cultures in the United States – know these foods simply as "beans."

Also, at the risk of sounding overly simplistic on this point, we share with you our World War II fathers' ditty, oft repeated by us in the sixties-era schoolyard: "The army gets the gravy but the navy gets the beans, beans, beans, beans..." Nary a "dried beans" in the phrasing...

We thank you for the opportunity to participate in these important program review procedures and look forward to the results of your hard work and diligence.



Amy Barr, M.S., Ed.M., R.D.



Liz Marr, M.S., R.D.