

GRAIN FOODS FOUNDATION

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Felicia Satchell, Staff Director
Food Labeling and Standards
Food and Drug Administration
Center for Food Safety and Applied Nutrition
5100 Paint Branch Parkway
College Park, Maryland 20740

Dear Felicia:

Thank you for taking time to visit with me last month during the FDA Qualified Health Claims meeting. You answered many of my questions and concerns.

However, I would still like to reiterate our views regarding the importance of establishing definitions for the terms "good source" and "excellent source" when used to describe whole grain content for food labeling. Using terms the consumer already associates with a dietarily significant amount of a food ingredient will help consumers easily identify those foods that will help them achieve three or more servings (one ounce equivalents) daily as recommended by the 2005 Dietary Guidelines and MyPyramid.

I understand that *analyzing for whole grain content is not feasible*, but by using fiber as a marker, it can be done to some degree of accuracy. Granted, there is no way to guarantee that all of the fiber present is from whole grains, but this "dilemma" also exists with other FDA-defined claims. It is impossible to guarantee that all of the beta glucan in a product comes from oats or that a product has sufficient soluble fiber or vitamin or mineral content before fortification or that a product labeled quantitatively for whole grain actually contains the number of grams claimed. Manufacturers using the soy health claim have to be willing to provide their formulations to assure they are following the letter of the law. If FDA is concerned about compliance by the food industry, it could impose similar obligations for companies using claims such as "made with," "good" and "excellent" sources for whole grains.

A content claim for whole grains is not an implied fiber claim. Whole grains are a sum of their parts, not just one of their parts. If the only reason for eating whole grains is because of their fiber content, then the Dietary

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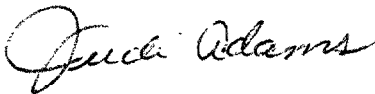
Guidelines would not have stipulated that we consume three or more servings daily; they would have only concentrated on their recommendations for fiber. Both the IOM (2005 DRI Macronutrient Report) and the Committee for Diet and Health (Diet and Health 1989) recognize the many components of whole grains and other plant-based products. For consumers to meet recommended fiber intakes of at least 25 grams daily, sources must go beyond whole grains and include fruits, vegetables and possibly bran. While whole grains are a good place to find fiber, it would take numerous servings of whole grain breads and cereals to meet the fiber recommendations – more than the caloric allowances would permit

Similarly, Americans are also challenged to consume the recommended nine servings of fruits and vegetables daily, but not strictly for their fiber content. They also provide numerous vitamins, minerals, anti-oxidants and phytonutrients – similar to whole grains. Milk is not consumed just for its calcium content, but also for other vitamins and minerals and protein.

~~We urge FDA to reconsider their current stance on content labeling for whole grains.~~
“Factual” or merely quantitative numbers without context can misrepresent the true whole grain dietary contribution of a food. Labels such as “made with,” “good” or “excellent” sources are simple and familiar descriptors. They are important terms to help consumers make knowledgeable food choices and to assure that the food contains **significant** amounts of whole grains before making any content claims.

Thank you for your consideration. I would be glad to visit with you to clarify any of the above points at your convenience.

Sincerely,



Judi Adams, MS, RD
President