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Chenoweth Laboratory
100 Holdsworth Way
Amherst, MA 01003-9282

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Department of Food Science
College of Natural Resources
and the Environment

voice: 413.545.2276
fax: 413.545.1262
www.umass.edu/foodsci

December 14, 2004

The Honorable Tommy G. Thompson
Secretary, U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 425A
200 Independence Avenue, Southwest
Washington, DC 20201

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Dear Secretary Thompson:

I am writing this letter in strongest support of the Whole Grain Claims Citizen's Petition filed with FDA on May 11, 2004 DK/H2004P-0223/CPI.

Having served on the 2005 Dietary Guidelines Committee I can testify that the consumption of whole grains in the diet was a goal that the entire committee and the pertinent literature unanimously supported. However, I, along with some other members of the committee, were concerned that consumers (and some health professionals) did not know what foods had significant amounts of whole grains. This was compounded by the fact that consumers confuse fiber content with whole grains and, at times, even the color of food. Certainly the weight of the scientific evidence clearly shows the value of whole grains over fiber alone and/or the presence of scattered grain seeds in a food.

In order to insure that consumers obtain the benefits of whole grains they must be able to clearly identify foods that contain whole grains. With current labeling laws this is a virtual impossibility. The proposal in the petition for the definition and labeling of "excellent" and "good" sources of whole grains would allow consumers to make the right food choices to obtain the recommended 3 servings of whole grains per day.

This is a critically important matter. Whole grain consumption was recommended by the Dietary Guidelines Committee and will be in the 2005 Dietary Guidelines. As well, whole grains are the basis for FDA approved health claims. It is unconscionable to think that such a unanimous recommendation for health will be virtually impossible for consumers to fulfill because adequate labeling is not in place.

Therefore, I would hope that FDA will give this petition its highest priority so that the health recommendations being given to consumers can be acted upon.

Thank you for your consideration.

Sincerely,



F. M. Clydesdale
Distinguished Professor
and Department Head

FMC:jh

cc: Lester Crawford, DVM, Ph.D.
Eric Bost
Robert Brackett, Ph.D.
Eric Hentges, Ph.D.
Barbara Schneeman, Ph.D.