



Division of Dockets Management 1703 5 JUN 21 P1:59
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

June 20, 2005

**RE: FDA Docket No. 2004P-0223: Petition to Establish
Descriptive Claims for Whole Grain Content**

Dear Sir or Madam,

The Soyfoods Association of North America (SANA), the national trade association representing the soyfoods industry and a trusted resource in providing and disseminating information about the health benefits related to soy consumption, wishes to comment on the above-referenced citizen petition, which seeks to establish criteria for the descriptive claims "excellent source," "good source," and "made from" whole grain content under FDA's authority. SANA shares FDA's goal of providing consumers with accurate, truthful, and non-misleading information regarding whole grain content, and agrees with the purposes of this petition.

SANA respectfully submits that the definition of "whole grains" described in this petition, as revised on December 20, 2004, **should include soybeans as an example of a generally accepted whole grain.** The inclusion of soybeans in this definition is reflective of soybeans long been considered whole grains both in the food trade industry and the current USDA grain standard, which states, "Grain that consists of 50 percent or more of whole or broken soybeans..."¹ To promote clarity and consistency in whole grain claims, we urge FDA to include soybeans as a specific example in any definition or listing of "whole grains" offered for regulatory purposes.

Our members use soybeans as a valuable source of whole grains in soy flours, soy pastas, breads, cereals, and other products, as well as dairy analogs and meat alternatives. Soy-based grain foods and other soyfoods provide many health and cardiovascular benefits, and make a meaningful, healthy contribution to consumer intakes of whole grains-- meeting the goals of the new *U.S. Dietary Guidelines for Americans*.

Governmental agencies and the commodity industries support and recognize soybeans as whole grains in the food supply. We urge FDA to establish similar recognition to include soybeans in the regulatory definitions of whole grains in this petition and other regulatory standards. Thank you for your consideration.

Respectfully submitted,


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¹ U.S. Grain Standards Act- 7 C.F.R. s 810.1601

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