

The
Whole Grain Connection

A California non-profit corporation

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Aiming to enhance the desirability and availability of 100% whole grain breads, and other 100% whole grain products, from organically and sustainably grown grains, and thereby connecting farmers and bakers.

Division of Dockets Management (HFA - 305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville
MD 20852

March 14, 2006

Re: Docket number 2004P - 0223. Whole grain descriptive claims.

Defining whole grain ingredients and whole grain products - some suggestions

BACKGROUND

In order to account for the two basic styles of processing whole grain ingredients, two definitions could be introduced for the main ingredient in whole grain products such as breads, pasta and crackers. These processing styles are (1) a single step process where the *entire whole grain* is retrieved as flour or cracked grain, without ever being separated out, or (2) a multi-step process in which the whole grain is broken down and there is potential for separating out various parts; the retrieved product is *reconstituted whole grain* flour or cracked grain.

Whole wheat flours for bread, are often lacking sufficient protein or enzyme activity to produce a satisfactory bread. In many cases the whole wheat flour can be supplemented with vital wheat gluten to correct the protein level. The low level of enzyme activity can be corrected by the addition of enzyme active malted barley or wheat flour. The sum of the amounts of gluten and enzyme active malt required, is generally no more than 9% of the total flour.

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SUGGESTED DEFINITIONS

Two definitions are suggested for the ingredient flours or cracked grains used in *whole grain* products, as follows:

Entire whole grain flour or cracked grain

Entire whole grain flour or cracked grain should contain at least 90% whole grain, produced in a single step process during which no part of the original grain is removed. The sum of any vital wheat gluten and enzyme active malted grain added should be no more than 9%, and no other grain components should be present.

Reconstituted whole grain flour or cracked grain

Reconstituted whole grain flour or cracked grain should contain only components of the whole grain in proportions typical of the unprocessed whole grain. These components should include germ, bran, aleurone and endosperm. They may also include vital wheat gluten and enzyme active malted grain flour, in total up to 9% of the total grain present.

PRODUCT LABELING

Products labeled as *whole grain*, would contain either (1) *entire whole grain* flour or cracked grain or / and (2) *reconstituted whole grain* flour or cracked grain, as the only grain ingredients, as defined above.

Respectfully submitted by: Monica Spiller
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cc:

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