

GRAIN FOODS FOUNDATION

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April 17, 2006

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

RE: Docket No. 2006D-0066

The Grain Foods Foundation is a not-for-profit trade association whose 118 members come from the milling and baking industry and our allied companies and associations. Our mission is to make the consumer aware of the value of grain foods in a balanced diet, coupled with physical activity.

We are fully supportive of whole grains labeling that will encourage increased consumption of whole grains and help the consumer identify whole grain products in the grocery store. We also want standards that will guide manufacturers to label accurately and encourage them to develop more whole grain, and partially whole grain, foods for the marketplace.

We are pleased that you have chosen to use the AACC International's definition of whole grains and we are fully supportive of their comments to FDA on this issue, as we were part of their task force.

We want to emphasize that there is no certain level of ingestion that has been proven to reduce the risk of various diseases. As little as one serving of whole grain per day has been shown to be effective in some studies for reducing risk of chronic disease as per the Harvard Nurses' Health Study (Liu et al, 2000) and the male physicians study (Liu et al, 2003).

At the same time consuming three servings per day of whole grain have been shown to decrease risk as in the Nurses' Health Study (Liu et al, 1999; 2000) In addition, women with the highest whole grain consumption have been shown to weigh less and gain less weight over time (Liu et al, 2003).

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It is important that we do **not** send a message to consumers that **ONLY** 100% whole grain products are acceptable. Several studies have show that the decrease in risk reduction is not significantly affected by the whole grain content of the foods consumed, **but by the total combined amount** (Koh-Banerjee, 2004; Jensen, 2004).

The 2005 Dietary Guidelines for Americans recommend the consumption of at least 3 ounce-equivalents of whole grain each day. Bread is the most common form of grains consumed, and a standard slice contains 16 g of grain, this suggests that 48 g of whole grains per day should be recommended, based on a 2,000 calorie per day diet.

To make it easier for the consumer to understand how much whole grain is in a product, the FDA Guidance to label foods should be put into context, such as: **if a product label states “xx grams of whole grains” the phrase “at least 48 grams are recommended daily” should be included to provide context.**

This approach allows consumers to make healthy choices, while avoiding labeling standards that are overly restrictive and that may exclude a substantial number of helpful foods which contain whole grains, but do not meet a specific threshold. Incremental consumption of whole grains can add up to a beneficial amount, just as, unfortunately, calories do.

We also recommend that manufacturers be encouraged to use the words ‘whole’ or ‘whole grain’ in the ingredient list when describing whole grains. Examples of descriptions that would lessen confusion include (but are not limited to) the following:

Common labeling	Recommended labeling
Cornmeal	Whole grain cornmeal
Bulgur	Whole bulgur wheat
Oatmeal	Oatmeal (whole grain oats)
Graham flour	Whole wheat graham flour
Brown rice	Whole brown rice
Cracked wheat	Whole cracked wheat
Barley flakes	Whole grain barley flakes

Grain Foods Foundation Comments to FDA
Whole Grain Guidance
Docket No. 2006D-0066
April, 2006

We understand the problem in analyzing for whole grains as there is currently no good method. At this time, fiber content may be the only alternative. However, using fiber can be inaccurate because the fiber content varies between grains and it can be added to products which are not necessarily whole grain. Also, the use of fiber continues to feed the myth held by health professionals and consumers alike that fiber and whole grains are synonymous. **We recognize that FDA understands this dilemma.**

FDA should alter its recommendation that pizza or bagels labeled as “whole grain” or “whole wheat” should contain only whole grain flours or whole wheat flour. This would discourage manufacturers from developing new and creative ways to introduce whole grains to the consumer. These foods are not standardized at this time and should not have to conform to requirements previously reserved for standardized foods. Even FDA’s own health claim allows for foods that have 51% whole grain to carry the health claim for heart disease and some cancers. As long as the product states the amount of whole grain per serving, in the context of a daily intake of 48 g, it would be accurate and not misleading.

The Grain Foods Foundation believes that now is an opportune time to develop labeling guidelines for manufacturer that will help the consumer recognize and consume more whole grains. The interest in whole grains is at the highest peak in recent history and it is prudent that we seize the opportunity to educate the consumer so that they will increase their consumption – before interest wanes.

Thank you for the opportunity to provide these comments.

Sincerely,



Judi Adams, MS, RD
President



Charles Stout, President Milner Milling
Grain Foods Foundation Co-Chair



Joel Crowder, Director of Marketing, Bakery Group, The Kroger Co.
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