



April 18, 2006

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

Re: Federal Register, Vol. 71, No. 33, Docket No. 2006D-0066

The Society for Nutrition Education (SNE) is responding to the announcement in the Federal Register, Vol. 71, No. 33, Friday, February 17, 2006 regarding Draft Guidance for Industry and FDA Staff: Whole Grains Label Statements: Availability.

SNE is an international organization of 1,100 nutrition education professionals dedicated to promoting healthful sustainable food choices and sharing a vision of healthy people in healthy communities. Our members conduct research in education, behavior, and communication; develop and disseminate innovative nutrition education strategies; and communicate information on food, nutrition, and health issues to students, professionals, policy makers, and the public. Publications describing this work can be found in the SNE peer-reviewed *Journal of Nutrition Education and Behavior*, the leading research periodical devoted to behavioral nutrition, nutrition education, research, and policy.

SNE lauds the FDA for its clear statements regarding the nature and definition of whole grains. We are particularly pleased that the proposed definition requires that the “principal anatomical components – the starchy endosperm, germ and bran – be present in the same relative proportions as they exist in the intact caryopsis – to be considered a whole grain food.” Whole grains have appreciable nutritive value from many vitamins and minerals, in addition to fiber. The intent of the Dietary Guidelines for Americans 2005 and MyPyramid is to increase Americans’ consumption of whole grains. Therefore, it is essential that the consumer be able to identify these foods with certainty.

Given the emphasis on whole grains in the Dietary Guidelines for Americans 2005 and in MyPyramid, SNE advocates that food labeling support the goal of consuming more whole grains. Because of the growing scientific database regarding the benefits of increasing whole grains beyond the fiber contained therein, consumers need labeling information that accurately portrays the amount of whole grain contained in a product, rather than leaving the consumer to guess based on fiber content, product nomenclature, and ingredient lists; or worse yet equating whole grain content with fiber content.

The Dietary Guidelines for Americans 2005 recommend that people eat one-half their grain portions as whole grains. For the reference amount used on food labels, that would mean 48 grams of whole grain in the reference 2,000 kcal diet. In MyPyramid whole grain portions are defined as 1-ounce equivalents.

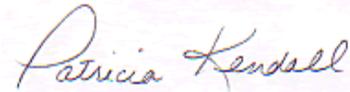
We understand that it is the intent of the FDA to make it easier for the consumer to identify products in which the principal ingredient is whole grain vs. products that have been fortified or include grain products other than whole grains. In the interest of clarity for the consumer we recommend that the following labeling phrases be used:

- Whole grain: A product in which all of the grains in the product maintain the principal anatomical components – the starchy endosperm, germ and bran –in the same relative proportions as they exist in the intact caryopsis.
- Made with whole grains: A product in which 51% or more of the grains in the product, by weight, are whole grains and the other grains present are enriched at levels recommended by law.
- For all products that include whole grains whether they qualify for the label of “whole grain” or “made with whole grain” the label should also state the grams of whole grain present in the product and the amount recommended. For example, “[Name of product] provides at least x grams of whole grain in each serving. At least 48 grams of whole grain is recommended daily.”

In conclusion, we recommend that the FDA consider two levels of labeling for whole grain products: “whole grain” and “made with whole grain”. In addition we recommend that the label of any food that contains whole grains include a statement as to the grams of whole grains present compared with the amount recommended in the reference 2,000 kcal diet.

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in blue ink that reads "Patricia Kendall". The signature is written in a cursive style and is positioned above the typed name.

Patricia Kendall, Ph.D., R.D., President
Society for Nutrition Education