

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

Docket No. 2006D-0066

Dear Division of Dockets Management,

The National Barley Foods Council (NBFC) is responding to the announcement in the Federal Register, Vol. 71, No. 33, Friday, February 17, 2006 regarding Draft Guidance for Industry and FDA Staff: Whole Grains Label Statements; Availability.

The NBFC is a not-for-profit 501 (a) organization established in 1989 to serve as an information clearinghouse and promotional and publicity resource for barley food issues as they relate to human health and consumption. The NBFC membership is comprised of five state barley producer groups. These are the Idaho Barley Commission, Montana Wheat and Barley Committee, North Dakota Barley Council, Oregon Grains Commission and the Washington Barley Commission.

The NBFC would first like to extend its support of labeling and FDA declaration of rule-making that will:

- encourage increased consumption of whole grains for better health as indicated in the Dietary Guidelines for Americans;
- give consumers greater clarity in the marketplace in order to select whole grain foods;
- eliminate or avoid multiple standards that will confuse consumers and manufacturers; and
- support and encourage new food production made with whole grains as well as foods made with a blend of whole and enriched grains.

### **Part III Definitions – Questions and Answers**

The NBFC would like to speak directly to number 5 which addresses barley specifically:

#### Dehulled Barley

We agree that dehulled barley (covered barley in which only the tough inedible outer hull has been removed) is whole grain. However, it's important to note that other terms are used within the processing industry to describe dehulled barley. Other terms used to describe this whole grain barley are “hulled” and “lightly pearled”. While all three terms may be used interchangeably, currently the term “hulled” is used most often by processors to describe this barley. ***To lessen confusion, we recommend using “hulled” as the primary term to describe this whole grain barley.***

#### Hulless Barley

It's important to note that there is another class of barley that should also be considered whole grain. Historically, this class of barley has been called “naked” barley. This type of barley is unique in that the tough inedible outer hull is very loosely adhered to the kernel. When the barley is harvested in the field, the tough outer hull tends to fall off on its own which means that this barley requires very little to no processing, making it a whole grain. In more recent years, processors have begun referring to this class of barley as “hulless” barley. This barley, while more limited in supply, is currently available and should be acknowledged as a whole grain. ***We recommend using “hulless” as the primary term to describe this whole grain barley.***

#### **Use “whole grain” in labeling to help further identify whole grain barley products**

The NBFC recommends that manufacturers be encouraged to use the words “whole grain” in ingredient listings to help clarify whole grain barley products for easier consumer identification.

Hulled or hulless barley kernels or berries should be labeled:

- Whole grain hulled barley
- Whole grain hulless barley

Or simply:

- Whole grain barley

Barley flakes, flour, meal and grits that are made from hulled or hulless barley should be labeled:

- Whole grain barley flakes
- Whole grain barley flour
- Whole grain barley meal
- Whole grain barley grits

Thank you for your consideration of these comments.

Sincerely,

Mary Palmer-Sullivan  
Executive Administrator  
National Barley Foods Council  
905 W. Riverside  
Suite 501  
Spokane, WA 99201  
(509) 456-4400  
[www.barleyfoods.org](http://www.barleyfoods.org)