



William L. Matthaei

President/CEO

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ROMAN MEAL COMPANY

Natural Whole Grain Goodness®

March 22, 2006

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

Re: Docket #2006D-0066

Dear Sir or Madam:

Since its founding in 1912, Roman Meal Company has been a leader in the consumer whole grain food marketplace. We are pleased with the recent increased interest in whole grain foods. We feel that it is critical to transmit accurate, meaningful information to the consumer about the value of whole grains in the diet. With this in mind, please allow us to make the following comments about the FDA Whole Grain Guidance:

- 1) The term "grain" in "whole grain" is not rigorously defined. There has been much discussion within the whole grain industry about what are grains and what are not. In the FDA Guidance, some ingredients are specifically excluded, such as soybeans and oilseeds. However, it must be absolutely clear to industry and to the consumer exactly what items are considered "grains". Listing some examples of grains, as is done in the Guidance, is incomplete. FDA should either list all approved grains by name or present a clear, unequivocal definition of what constitutes a grain.
- 2) The proposed FDA definition of "100% Whole Grain" excludes the use of any grain ingredients that are not "whole". This means that any bread in which vital wheat gluten is used could not be labeled "100% Whole Grain". Vital wheat gluten is a concentrated wheat protein that does not contain any of the wheat bran or germ. Vital wheat gluten is used to strengthen bread formulas that contain a large percentage of whole grain ingredients. It is not possible to produce palatable whole grain breads, in a wholesale baking environment, without the use of vital wheat gluten. In order to give the consumer the most appealing bread, and

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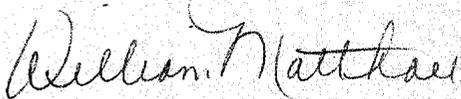
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therefore increase the consumption of whole grains, the use of reasonable amounts of vital wheat gluten in "100% Whole Grain" bread must be allowed.

- 3) The Guidance discourages the use of descriptors such as "good source" or "excellent source". In the Guidance, statements of actual content (e.g. , "contains 2 g. of whole grains") are acceptable. The problem with statements of content is that the average consumer does not know if 2 g. of whole grains is significant or insignificant. What is more beneficial to the consumer is a quick guideline that does not force them to make their own computation about what percentage a particular food is contributing to the recommended daily whole grain intake. The Whole Grains Council stamp program is such a quick and meaningful guideline. It supports the 2005 Dietary Guidelines issued by U.S.D.A.

Thank you for providing a forum in which the views of Roman Meal Company can be expressed. Again, the goal of the FDA Whole Grain Guidance must be to transmit accurate and relevant information to the consumer. By adopting the above comments into the final Guidance, we feel that this goal will be realized.

Sincerely,



William L. Matthaei