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Barbara Schneeman, PhD  
Director, Office of Nutritional Products, Labeling and Dietary Supplements  
Center for Food Safety and Applied Nutrition (HFS-830)  
Food and Drug Administration  
5100 Paint Branch Pkwy  
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Attn: Shellee Anderson

[Docket No. 2006D-0066]

Dear Dr. Schneeman:



**Anne Banville**  
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The USA Rice Federation commends the Food and Drug Administration (FDA) for its efforts to provide guidance to the industry and FDA staff about what the agency considers to be 'whole grain' and to assist manufacturers in labeling their products. USA Rice Federation is a national trade association representing rice producers, millers, merchants and related industry organizations and companies. We conduct nutrition education programs dedicated to educating consumers about the importance of rice in healthy eating, and how rice helps to achieve a variety of nutrition and dietary goals. We thank the agency for seeking comments from the public on its proposed Whole Grains Label Statements guidance.

**We agree with FDA that label statements about whole grains should meet FDA's requirement that label statements are not false or misleading<sup>1</sup>.** This will help assure the full realization of the benefits of whole grains in the diet. The *2005 Dietary Guidelines for Americans* groundbreaking recommendation on whole grain consumption has major consumer health implications. As documented by the Dietary Guidelines Advisory Committee, "Consuming at least 3 servings (equivalent to 3 ounces) of whole grains per day can reduce the risk of diabetes and coronary heart disease (CHD) and helps with weight maintenance."<sup>2</sup> CHD and obesity, and the related onset of diabetes, are the leading health issues in the U.S. population. Scientific research documented by the Advisory Committee confirms the role of whole grains in reducing these serious conditions. In addition, leading whole grains expert Joann Slavin, PhD, University of Minnesota, who testified before the Advisory Committee, has reported that the health benefits of whole grains go far beyond fiber content to include phytonutrients, antioxidants and other components. According to Slavin, "Fiber is the undigested part of the carbohydrate, where as the whole grain includes fiber but also the germ of the grain and the endosperm. Whole grain is a complete food, not just the isolated fiber fraction."<sup>3</sup> **USA Rice Federation believes that increasing consumer consumption of whole grains should be a major public health priority, and truthful and factual label information for whole grain products must become a key element of consumer education.**

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**USA Rice Federation agrees with FDA's definition of whole grain and foods made from them as cereal grains that consist of the intact, ground, cracked or flaked caryopsis (kernel) with the endosperm, germ and bran present in the same relative proportions as they exist in the intact kernel.** This definition is consistent with the American Association of Cereal Chemists (AACC) and 2005 Dietary Guidelines Advisory Committee definitions for whole grain. Under this definition, brown rice qualifies as a 100% whole grain, as FDA noted in materials released with the proposed guidance.

### **USA Rice Federation's Education Initiatives**

As a whole grain, brown rice provides important nutrients and fiber with approximately 108 calories per half cup serving, no sodium or cholesterol, trace fat, and no trans fats. The USA Rice Federation is committed to educating consumers on how to increase overall whole grain consumption and brown rice, consistent with the *Dietary Guidelines for Americans* recommendation to get half of their grains from whole, and the rest from refined. A Scientific Advisory Panel of nationally known nutrition experts guides the Federation's nutrition education program to ensure all consumer and health professional communications are grounded in the latest science. Our program materials include a backgrounder, *Brown Rice Basics* with science-based information about brown rice and health for dietitians and health professionals to use as they educate consumers. Following the release of the *2005 Dietary Guidelines*, we created the *Whole Grain Goodness* brochure to publicize the *Dietary Guidelines* recommendation, along with tips to help consumers easily achieve the three ounce equivalent or more of whole grains each day. In addition we developed the *Healthy Rice Bowls* concept to show consumers how to translate the *Dietary Guidelines* recommendations into meals, as well as brown rice recipes and cooking and preparation tips. This information has been distributed widely to consumers, dietitians, health professionals and media by the Federation and its member companies at trade shows, health fairs, through mailings and media releases, and are posted on our web site, [www.usarice.com](http://www.usarice.com). As members of the Oldways Whole Grains Council, the Federation and our miller members with whole grain products are working aggressively along with nutrition educators, scientific authorities, and other food groups to bring brown rice and all whole grains into mainstream usage.

In other consumer education initiatives, the USA Rice Federation supports the education efforts of the American Dietetic Association's Women's Health and Reproductive Nutrition practice group by providing information to educate about the role of rice in delivering folic acid, an important nutrient in preventing birth defects. Additionally, the Federation commissioned research showing for the first time that rice eaters have healthier diets than non-rice eaters, and eat more like the *Dietary Guidelines* recommend, in that they consume more fruits and vegetables and less saturated fat than non-rice eaters.

### **Importance of Consumer-Based Education**

USA Rice Federation believes that consumer education through various organizations and through many vehicles is necessary to help consumers make healthful choices consistent with the *Dietary Guidelines*. We agree that FDA's draft "Whole Grain Label Statements" guidance will begin to give consistency to how whole grains are communicated to consumers and identified on packages.

USA Rice Federation believes it is necessary to help consumers identify whole grains foods on packages in the supermarket. While consumers (90 percent) are aware that brown rice is a whole grain<sup>4</sup>, we believe efforts to easily identify whole grains on food packages will allow for easier implementation of the whole grains dietary guidance. As stated in the *2005 Dietary*

*Guidelines for Americans* “whole grains cannot be identified by the color of the food; label-reading skills are needed.” Behavior change models indicate that awareness and desire to make a change are important factors in making positive behavior changes.

Research shows that consumers are aware of the benefits of whole grains<sup>4,5</sup> they want to eat more whole grains<sup>5,6</sup>, and they are trying to consume more whole grains<sup>5,6</sup>. However, consumers they feel it is difficult to find whole grains in the store. One study indicated that 75 percent of people say they look for whole grain foods when grocery shopping<sup>4</sup>. However, in another study, just 8 percent of consumers say it is easy to know what foods are whole grains and 51 percent say it is very or somewhat difficult to know what foods are whole grains<sup>7</sup>.

Given the difficulty consumers express in being able to identify whole grain products, the Federation believes it is important to provide consumers with a simplified way for determining which foods are whole grains with information that consumers understand. We agree with FDA’s guidance that industry may use factual statements on package labels, such as “100% whole grain brown rice”, “10 grams of whole grain”, and “1/2 ounce of whole grain”. There is also value in using simple icons or stamps on packages to give consumers a way to identify whole grain foods. Responsible initiatives such as the package stamps developed by the Whole Grains Council are helpful and make it easy for consumers to implement the *Dietary Guidelines*’ whole grains recommendation.

Nutrition educators and government programs, including the Department of Health and Human Services *Steps to a Healthier US* and U.S. Department of Agriculture’s MyPyramid *Steps to a Healthier You* recognize stepwise approaches to consumer education as sound and practical. Stepwise changes are more realistic ways to help consumers begin to implement important, positive dietary changes. Label information that helps consumers identify products, like brown rice, as 100 percent whole grain, or products with brown rice as an ingredient (such as cereals and healthful snacks), as a source of whole grain will help consumers make healthful changes to help them achieve their goals.

**In summary, the USA Rice Federation supports FDA’s proposed Whole Grains Label Statements guidance. We believe that increasing consumer consumption of whole grains should be a major public health priority, and truthful, factual and consumer-based information on packages for whole grain products must become a key element of consumer education.**

Thank you for the opportunity to provide our comments.

Sincerely,



Anne Banville  
Vice President, Domestic Promotion

## REFERENCES

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- <sup>1</sup> Federal Food, Drug, and Cosmetic Act, Section 403(a)
- <sup>2</sup> Dietary Guidelines Advisory Committee Report (2005) Part D: Science Base, Section 6: Selected Food Groups.
- <sup>3</sup> Shanta-Retelny, V. The Whole Story – Fiber, Whole Grains, & Health. *Today's Dietitian*. Vol. 7, No. 2, p. 28.
- <sup>4</sup> Consumer Attitudes & Awareness Regarding Whole Grains. Riviana Foods Inc, Houston, TX, April 2006.
- <sup>5</sup> International Food Information Council Foundation. Cogent Research, Boston, MA, November 7-21, 2005.
- <sup>6</sup> NPD Group Diet Monitor, Chicago, IL, January 2006.
- <sup>7</sup> Harris Interactive, on behalf of Uncle Ben's, December 2005.

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