



BRAND MARKETING GROUP

February 16, 2006

Dr. Robert E. Brackett
Director of the
FDA's Center for Food Safety
and Applied Nutrition

Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20857

Dear Dr. Brackett:

Read this article this morning. Pleased to see the goal to present clarity re whole grain and the definition of wheat for pizza crust.

As a consumer; and, as a marketing consultant who specializes in inventing new food products, I ask that you apply this same criteria to other so called whole wheat products; particularly bread, but also pasta, tortillas, etc. Actually I ask that you require all flour in all products to be wheat flour, as you are for pizza crust, for a product to be named "whole wheat".

Thank you for your consideration.

Sincerely,

Christine Broxon
President



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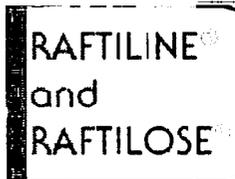
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US: FDA issues "whole grain" definition

16 Feb 2006
Source: just-food.com

The Food and Drug Administration has issued draft guidance on what the term "whole grain" may include.

The FDA document clarifies that the agency considers "whole grain" to include cereal grains that consist of the intact, ground, cracked or flaked fruit of the grains whose principal components - the starchy endosperm, germ and bran - are present in the same relative proportions as they exist in the intact grain. Such grains may include barley, buckwheat, bulgur, corn, millet, rice, rye, oats, sorghum, wheat and wild rice.

The draft guidance states that although rolled and "quick oats" can be called "whole grains" because they contain all of their bran, germ and endosperm, other widely used food products may not meet the "whole grain" definition. For example, FDA does not consider products derived from legumes (soybeans), oilseeds (sunflower seeds) and roots (arrowroot) as "whole grains." The draft guidance specifically recommends that only be labelled as "whole grain" or "whole wheat" when its crust is made entirely from whole grain or whole wheat flour, respectively.

"The food label is the best tool we have to help consumers choose a healthy diet, which includes grain products," said Dr. Robert E. Brackett, director of FDA's Center for Food Safety and Applied Nutrition.

Robert Earl, MPH, RD, senior director of nutrition for the Food Products Association (FPA), said "Communicating about the whole grain content of foods is important for food companies, so the guidance by the Food and Drug Administration has been eagerly awaited. Today, FDA has clearly defined what is and what is not a whole grain.

"FPA believes that the food label should deliver information to inform consumers about ways that grain or whole grain containing foods meet dietary recommendations and fit into healthful lifestyles. We strongly support science-based nutrition information and its potential to make a significant contribution to promoting the health and well-being of Americans.



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Jenny Butler