

State of California—Health and Human Services Agency
Department of Health Services



California
Department of
Health Services

DIANA M. BONTÁ, R.N., Dr. P.H.
Director

ARNOLD SCHWARZENEGGER
Governor

April 17, 2006

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

To Whom It May Concern:

I am writing to provide comments from the California Women, Infants and Children (WIC) Supplemental Nutrition Program on the Draft Guidance for Whole Grain Label Statements, Docket #2006D-0066.

Although the guidance is intended for the regulated food industry and Food and Drug Administration (FDA) personnel, the California WIC Program is an interested party. What the agency considers to be "whole grain" and how manufacturers label their products will influence how we educate the 1.36 million California WIC participants. The California WIC Program appreciates the FDA's action in addressing this important issue.

Over the past year the release of the "Dietary Guidelines for Americans, 2005" and recommendation on the WIC food packages by the Institute of Medicine have made whole grain products a focus in the WIC community. One the recommendation of the "Dietary Guidelines for Americans in 2005" is to increase consumption of whole grains, yet consumers find it difficult to identify and select products that contain whole grains. The Institute of Medicine (IOM) released the final report from its independent review of the WIC food packages entitled "*WIC Food Packages: Time for a Change*" in April of 2005 and it recommends providing only breakfast cereals that are at least 51% whole grains by weight. If this recommendation is adopted for WIC, the lack of clarity in current labeling requirements will make it difficult to identify which products meet this definition.

The FDA's draft guidance is a welcome first step in standardizing whole grain product labeling. The current regulations along with the guidance, if followed by manufacturers, may result in labeling that would help consumers identify and select whole grain products. But, to ease consumer confusion, additional steps must be taken.

2006D-0066

C 18

To Whom It May Concern
Page 2
April 17, 2006

We urge the FDA to require food manufacturers to follow the guidance regarding the identification of products as "whole grain" and make only factual statements about the whole grain content on product labels. Because many WIC participants have limited reading and writing skills and, for the majority of them, English is a second language, it is important that the FDA provide a clear definition of whole grains so that manufacturers can label whole grain products with simple recognizable language. Currently, many consumers are relying on the amount of fiber per serving recorded in the "percent daily value" to select whole grains. They are hoping that high fiber items are also high in whole grains or vice versa however, since these two components are not synonymous, it only adds to customer confusion. If the FDA were to require manufacturers to add whole grains to the "percent daily value" it would help consumers identify and select whole grain foods. Lastly, it would be helpful if the "Questions and Answers" in the Guidance were summarized in a table to provide a quick reference of foods that meet the whole grain definition.

The California WIC Program wholeheartedly supports the "Dietary Guidelines for Americans, 2005", which includes recommendations for whole grain intake. We applaud the FDA's efforts to provide guidance to industry and FDA staff on this important issue. Thank you for the opportunity to comment on your draft guidance. Should you have any questions regarding our comments, please contact me at (916) 928-8806.

Sincerely,



Linnea Sallack, M.P.H., R.D., Chief
Women, Infants, and Children (WIC)
Supplemental Nutrition Branch
California Department of Health Services