



A consortium of industry, scientists, chefs and Oldways to increase consumption of whole grains to provide better health for all consumers

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The Whole Grains Council is a non-profit consumer-advocacy group working with scientists, chefs and industry to promote increased consumption of whole grains for better health. We support the strong recommendation for whole grains in the 2005 Dietary Guidelines for Americans, prepared jointly by HHS and USDA. We also support FDA guidance and rulemaking that helps consumers easily find foods that fulfill the Dietary Guidelines' recommendations. Such guidance and rulemaking should ideally:

- Help Americans move toward eating 3 or more servings of whole grains daily;
- Eliminate multiple standards and vague wording that paralyze consumers and manufacturers alike;
- Encourage the manufacturing and consumption of foods made with a blend of whole and enriched grains – not just foods entirely or almost entirely manufactured with whole grains – as long as those foods contribute at least half a Pyramid serving of whole grains.

The FDA's recent Draft Guidance on Whole Grain Label Statements represents an important first step toward reaching these goals. In the following pages of this letter we are offering suggestions for moving to the next step, by

1. Further clarifying the definition of whole grain and the list of varieties that can be considered whole grains;
2. Suggesting the inclusion of a few specific grain forms that contribute important whole grain health benefits to the American diet, even though small amounts of the kernel are lost in processing;
3. Detailing some of the issues that may need to be taken into consideration in labeling products as "100% whole grain;"
4. Listing suggested wording for whole grain ingredients; and
5. Reviewing the strong need for the Whole Grain Stamp, especially in the context of serious limitations in alternate ways for consumers to identify whole grains.

The Whole Grains Council appreciates the opportunity to provide input as the FDA works toward a final guidance document and we stand ready to assist FDA in this process in any way that may be helpful.

Sincerely,

Jeff Dahlberg
Chairman, Whole Grains Council

The Whole Grains Council has the following comments on Part III of the Draft Guidance:

- 1. We agree with the definition of whole grain as including the bran, germ and endosperm, but suggest that the wording used in the Dietary Guidelines may have some advantages:** “Whole grains as well as foods made from them, consist of the entire grain seed, usually called the kernel. The kernel is made of three components – the bran, germ, and the endosperm. If the kernel has been cracked, crushed, or flaked, then it must retain nearly the same relative proportions of bran, germ, and endosperm as the original grain to be called whole grain.”

This wording avoids the word caryopsis, which may not be recognized by manufacturers, and by saying “nearly the same relative proportions” allows inclusion of a few very specific grains that are generally recognized as whole grains despite slight losses of the kernel through traditional processing methods (e.g., bulgur, nixtimalized corn and lightly pearled durum wheat (grano) and barley. (see #4 and #5)

- 2. We agree with the list of grains included as whole grains, with further clarifications based on AACC International’s comprehensive list shown below:**

True Cereals	Scientific name
Wheat and bulgur wheat, including spelt, emmer, farro, einkorn, kamut, durums	<i>Triticum spp.</i>
Rice, African rice	<i>Oryza spp.</i>
Barley	<i>Hordeum spp.</i>
Corn (Maize, Popcorn)	<i>Zea mays</i>
Rye	<i>Secale cereale spp.</i>
Oats	<i>Avena spp.</i>
Millet	<i>Brachiaria spp.; Pennisetum spp.; Panicum spp.; Setaria spp.; Paspalum spp.; Eleusine spp.; Echinochloa spp.</i>
Sorghum	<i>Sorghum spp.</i>
Teff (tef)	<i>Eragrostis spp.</i>
Triticale	<i>Triticale</i>
Canary Seed	<i>Phalaris arundinacea</i>
Job’s Tears	<i>Coix lachrymal-job</i>
Fonio, Black Fonio, Asian Millet	<i>Digitaria spp.</i>
Pseudocereals	Scientific name
Amaranth	<i>Amaranthus caudatus</i>
Buckwheat, Tartar Buckwheat	<i>Fagopyrum spp</i>
Quinoa	<i>Chenopodium quinoa Willd - is generally considered to be a single species within the Chenopodiaceae</i>
Wild rice	<i>Zizania aquatica</i>

- 3. We agree that legumes and oilseeds should not be considered whole grains.**
- 4. We agree that corn meal and corn flour that are degerminated or bolted are not whole grain.** Based on questions the WGC receives regularly from both consumers and manufacturers, we feel it would be useful to clarify that whole fresh corn is a whole grain. We also support the work of AACC International in clarifying the role of nixtimalized corn. Although slight amounts of bran are lost through nixtimalization, this process improves bioavailability of certain nutrients and significantly reduces levels of micotoxins. Through the work of the WGC’s parent organization, Oldways Preservation Trust, we are familiar with the important traditional role of nixtimalized corn (and masa) in many ethnic cultures, and we urge the FDA to work with AACC’s experts in recognizing and defining when nixtimalized corn can be considered whole grain.
- 5. We agree that dehulled barley is a whole grain and that “hull-less” naked barleys are also whole.** We also agreed that Pearled, Medium and Fine barley are not whole grains. However, the classification of lightly pearled barley is still in question. AACC International has convened a task force on this issue, and we urge FDA to consider input from these scientific experts before making a final classification of lightly pearled barley – and lightly pearled durum wheat (grano) which presents similar issues.

6. **We agree that rolled oats, quick oats, and other oat products made from the entire oat groat are whole grains.**
7. **We agree that products should be labeled “100% whole grain” only when all the grain ingredients are those that the FDA considers whole grain.** However, we urge FDA to clearly define the conditions under which small amounts of non-whole grains – such as corn starch as a release agent, bran as a decorative topping, or vital wheat gluten for successful leavening – can be used in “100% whole grain products.” Such issues have been addressed appropriately in 21 CFR 136.110(c)(18) and 21 CFR 136.110(c)(11) in defining the standard of identify for whole wheat bread. Clarification of similar limits on non-whole-grain ingredients for foods other than whole wheat bread would encourage manufacturers to produce a wider variety of whole grain foods.

Clear labeling of products that contain both refined and whole grains is essential. Pizza and bagels that contain dietarily significant amounts of whole grain but also contain refined or enriched grains should be allowed to make clear statements about their whole grain content (see Question 10). FDA should clearly define when statements such as “Made with Whole Grain” can be used, as such statements are sometimes used in misleading ways.

8. **We agree that labels should clearly differentiate between “durum wheat” and “whole durum wheat” to reduce consumer confusion.** In fact, we urge that manufacturers use the word “whole” or “whole grain” to describe all whole grains in the ingredient list (see Question 10).
9. **We agree that the standards of identity for whole wheat bread and pasta exist** and help the consumer identify whole grain products. As long as clear definitions and labeling guidelines are established for whole grains, it should not be necessary to create numerous standards of identity for whole grain products.
10. **We support FDA's goal of clarifying the types of whole-grain labeling statements allowed on food products, in order to help consumers make wise choices in accordance with science and with the Dietary Guidelines.**

The labeling options supported in the Draft Guidance have limitations. **Ingredient Lists** have existed in their current form since 1994, and the **Whole Grain Health Claim** has been available since 1999, yet surveys show these two options do not clearly guide consumers and do not lead to increased whole grain consumption.

- A December 2005 survey of 1,804 consumers conducted by Harris Interactive on behalf of Masterfoods USA found that consumers have a hard time knowing what is and isn't a whole grain food. Only 8% say it is “very easy” to know what foods are whole grain foods, while half (51%) say it is very or somewhat difficult to do so.
- In a survey of 2,051 consumers conducted by Opinion Research Corporation, also in December 2005, on behalf of the Whole Grains Council and Knorr®-Lipton® Sides™ Made with Whole Grains, 40% said that “the ability to find or locate whole grain products at the store” was a challenge that kept them from consuming more whole grains.

There are many reasons for consumers' past failure to identify whole grain products.

First, there are no standards for describing whole grain ingredients on ingredient lists. This is an area in which the FDA's guidance could be extremely helpful. We recommend that manufacturers be encouraged to use the words ‘whole’ or ‘whole grain’ in the ingredient list when describing whole grains. Examples of descriptions that would lessen confusion include (but are not limited to) the following:

<u>Typical label wording</u>	<u>Recommended clarification</u>
Cornmeal	Whole grain cornmeal
Bulgur	Whole bulgur wheat
Oatmeal	Oatmeal (whole grain oats)
Graham flour	Whole wheat flour
Brown rice	Whole brown rice
Cracked wheat	Cracked whole wheat
Barley flakes	Whole grain barley flakes
Wheat berries	Whole wheat kernels
Ground spelt	Whole grain spelt wheat flour

Yet, even if manufacturers clarify that “rolled oats,” for example, are whole grains, ingredient lists offer a foolproof way of finding whole grains **only** for products that are 100% whole grain. A multi-grain bread, for example, could contain 25% of its flour as enriched wheat flour, with the remaining flour being evenly divided between five whole grain flours. Each of the whole grains would comprise 15% of the total grain – but all would be listed after the refined flour, making it impossible for the consumer to know if this bread is 75% whole grain or 7.5% – or any level in between. The reverse could also happen, where a multi-grain product listing “whole wheat flour” first might consist primarily of refined grains.

Second, the whole grain health claim, while useful, is limited in its application. Few mixed products containing both whole and refined grains can qualify for this claim – and some 100% whole grain products do not even qualify. Because the claim requires a fiber content of 11% for the grains used, a box of brown rice, for example, or a sack of whole-grain cornmeal, could not use this health claim. For many consumers unaccustomed to the taste and texture of whole grains, the few products using the whole grain health claim may be too “hard core” for their tastes, which may explain why consumption did not budge in the five years following introduction of the whole grain health claim.

Consumers need a way to find “mixed products” with a dietarily significant amount of whole grain content. The Dietary Guidelines Advisory Committee endorsed the importance of recognizing consumption of such mixed foods when it stated:

“In practice, when a person selects a mixed grain bread or cereal, he gets *both* a whole grain portion and an enriched grain portion. Because of the desirable baking properties of enriched flour, these mixed grain products are often appealing to consumers who do not choose to eat 100 percent whole grains. ... While many are not entirely whole grains, they provide some whole grains in the diets of those who might not otherwise select any. The proposed Pyramid food patterns suggest that half of all grain servings be whole grains. This approach allows these mixed products to fit readily into a person’s food choices.” (*2005 Dietary Guidelines Advisory Committee Report, Appendix G2, page 16-17*)

The third option offered in FDA’s Draft Guidance allows labels to state “xx grams of whole grain.” As the WGC stated in its December 28, 2005 letter to FDA, we are concerned that this approach could be misleading to consumers unless:

- a) Use is limited to foods containing a dietarily significant amount of whole grains, i.e., at least 8g (one-half a Pyramid serving) of whole grains, and
- b) Packaging also clearly states that 48g or more of whole grains is recommended daily by the Dietary Guidelines.

Used in such a responsible way, “xx grams of whole grain” would help consumers gauge their progress toward meeting the Dietary Guidelines’ recommendations. Coupled with a “graphic shortcut” like the Whole Grain Stamp, this approach would help consumers find both 100% whole grain products and mixed products in the marketplace.

11. We agree that the name of a particular whole grain can not be substituted in health claims, but that it can in other instances as long as it is truthful and not misleading.