



Advancing grain science worldwide

President
George Lookhart
Kansas State University

President-Elect
Stuart Craig
Danisco USA Inc.

Chair of the Board
James Dexter
Canadian Grain Commission

Treasurer
Elizabeth Knight
McComrick & Company

Director
Filip Arnaut
Puracor

Director
Mary Ellen Camire
University of Maine

Director
Khalil Khan
North Dakota State University

Director
Sakharam Patil
S.K. Patil & Associates

Director
Virgil Smail
Kansas State University

International Director
Jan Willem Van der Kamp
TNO Nutrition and Food
Research

Executive Vice President
Steven C. Nelson

American Association
of Cereal Chemists
3340 Pilot Knob Road
St. Paul, MN 55121
Phone: +1.651.454.7250
Fax: +1.651.454.0766
E-mail: aacc@scisoc.org
AACNet: www.aaccnet.org

December 27, 2004

The Honorable Tommy G. Thompson
Secretary, U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 425A
200 Independence Avenue, Southwest
Washington, DC 20201

We on the Board of Directors of the American Association of Cereal Chemists (AACC), at the recommendation of several of our Scientific Advisory Committee and the Whole Grains Task Force, are writing this letter to encourage prompt action by FDA on the General Mills Whole Grain Claims Citizens petition filed with FDA on May 11, 2004 (DK/H 2004-0223CP1).

We support consistent, uniform definitions for “good” and “excellent” sources of whole grain. This will give consumers a practical tool to help make sound nutritional choices regarding diet.

We would also like to add a category “Made with whole grains” which would have 5 grams of whole grain per serving. (This would amend the proposal of the Citizen’s Petition on page 21.) This designation will be especially important in the bread category or for other grain-based foods that contain more water than cereal, crackers and snack foods. This level is important for public health as epidemiological studies show that most of the whole grain servings are contributed by bread. The “Made with whole grains” category will be an important incentive to bread makers to start adding whole grain to breads so that the bread supply can help consumers make the transition from ingestion of mostly refined grain to ingestion of at least three servings of whole grain foods. The “Made with whole grains” category is also consistent with other labeling requirements where 10% of the recommended daily value (48 grams of whole grains/day) would be delivered. If a person ingests 5 servings of “Made with whole grains” and one serving as “Excellent”, then they would be at 80% of the recommended level. This would be a significant in helping consumers reach the goals set by the U.S. Dietary Guidelines.

As an scientific society comprised of bread and cereal manufacturers including members from government, industry and academia, it is our role both to help change the food supply to meet government recommendations, to label the food effectively and to teach the American public how to implement dietary guidance. Adding a way for consumers to identify and consume more whole grain foods is an important step as data shows that consumers currently are unable to identify

foods that contribute whole grains to the diet. A labeling system such as the one in the Citizen's Petition is needed.

The benefits of consuming more whole grains are widely recognized not only by the Department of Health and Human Services and the U. S Department of Agriculture, but also by most health organizations. However, we know that there is a significant gap between the recommended amounts and actual consumption as the average American consumer ingests less than a serving of whole grain per day.

One of the major road blocks to reaching the recommended goals for whole grain consumption is the confusion around how to identify whole grain foods in the marketplace. Uniform definitions for "good" and "excellent" sources of whole grain will give consumers an important tool needed to identify foods that contain significant amounts of whole grain.

We at the AACC want to encourage prompt action on this petition with the minor modification. Doing this will allow consumers to take advantage of the important dietary advice to increase the consumption of whole grain foods. We hope that FDA will commence action in advance of the release of the new Dietary Guidelines and Food Guide Pyramid.

cc: Lester Crawford, DVM, Ph.D.
Eric Bost
Robert Brackett, Ph.D.
Eric Hentges, Ph.D.
Barbara Schneeman, Ph.D.

