



Advancing grain science worldwide

April 21, 2008

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

RIN 0910-ZA30

Docket No. FDA-2008- N-0040 (formerly Docket No. 2006N-0168), Food Labeling:  
Revision of Reference Values and Mandatory Nutrients

*President*  
Bernard L. Bruinsma  
Innovative Cereal Systems  
LLC

*President-Elect*  
Mary Ellen Camire  
University of Maine

*Chair of the Board*  
Rob Hamer  
Wageningen Centre Food  
Sciences

*Treasurer*  
Laura Hansen  
General Mills Inc

*Director*  
Margaret Bath  
Kellogg Co.

*Director*  
Jan A. Delcour  
Katholieke Univ Leuven

*Director*  
Elizabeth Knight  
McCormick & Company

*Director*  
Maureen Olewnik  
AIB International

*Director*  
B. Moses Okot-Kotber  
Analytix Laboratories

*Director*  
Sergio O. Serna-Saldivar  
ITESM

Members of the AACC International Task Force on Defining Whole Grains in Food are responding to the announcement in the Federal Register: November 2, 2007 (Volume 72, Number 212) regarding Food Labeling: Revision of Reference Values and Mandatory Nutrients.

The Task Force is comprised of academics, industry, non-profit, and government participants trying to arrive at the best possible labeling, research and communication agendas on the whole grain issue. Furthermore, the work of the Task Force is strengthened by smaller expert task forces convened to deal with issues specific to processing of traditional whole grain foods such as barley, bulgur, and liming of corn (nixtimalization).

AACC International (formerly the American Association of Cereal Chemists) is the premier worldwide organization for advancing grain science and technology by creating, interpreting, and disseminating cereal information and providing personal and professional development opportunities for its members. Worldwide membership in AACC International includes over 3500 scientists representing industry, academia, and government.

The principal dietary guidance provided by the U.S. Government is the Dietary Guidelines for Americans. By law (Public Law 101-445, Section 301), the Dietary Guidelines is to be "promoted by each Federal agency in carrying out any Federal food, nutrition, or health program." Consumers would be well-served if the information found on food packages better reinforced and supported the recommendations of the Dietary Guidelines for Americans.

Currently the differences between FDA's approach and the Dietary Guidelines are many – and are confusing to consumers. For example, FDA calls out individual nutrients while the Dietary Guidelines focuses on whole foods. FDA also uses serving sizes (RACCs) that, in most cases, are appreciable larger than those used by the Dietary Guidelines – and may legally be even larger for products in discrete single serving units. Some examples are shown in the table below:

*Executive Vice President*  
Steven C. Nelson

AACC International  
3340 Pilot Knob Road  
St. Paul, MN 55121  
Phone: +1.651.454.7250  
Fax: +1.651.454.0766  
E-mail: aacc@scisoc.org  
AACCnet: www.aaccnet.org

	DG/Pyramid serving	FDA RACC	Max. single serve unit (RACC x 200%)
Rice	1/2 cup prepared	140g prepared (.71cup)	1.4 cups prepared
Hot cereal	1/2 cup prepared	1 cup prepared	2 cups prepared
Bread, rolls	1 slice (~25-40g)	50g	100g
Bagels	1 mini-bagel (1oz)	55g	110g
Pasta	1 oz dry	2 oz. dry	4 oz. dry

While we realize that both FDA and USDA are constrained by existing regulations, we are writing to urge that all parties find a way to move beyond these constraints, to better serve the American public with a consistent message – and to conform with Public Law 101-445, Section 301.

The Dietary Guidelines, for example, recommends that all consume 3 or more servings (called “ounce equivalents”) of whole grains daily. A consumer who wishes to follow this advice receives no clear guidance from standard packaging information.

Without suggesting a specific approach, AACC International’s Task Force on Whole Grains urges that FDA work with industry and consumers to explore effective ways that package labeling can communicate to Americans how to follow the Dietary Guidelines.

Best Regards,

Bernard L. Bruinsma  
President, AACC International

