

THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
FOOD AND DRUG ADMINISTRATION

Petition to Prohibit Misbranding  
of Whole Wheat Products  
and to Promulgate Food Labeling  
Regulations Concerning Products  
Made with Whole Wheat

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Submitted by the  
Center for Science in the Public Interest  
June 25, 1993

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PROJECTS MANAGEMENT BRANCH

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## TABLE OF CONTENTS

I.	ACTION REQUESTED . . . . .	1
II.	INTRODUCTION . . . . .	3
III.	STATEMENT OF FACTUAL GROUNDS . . . . .	4
IV.	STATEMENT OF LEGAL GROUNDS . . . . .	6
	A. Keebler and Nabisco "Whole Wheat" Products Are Misbranded . . . . .	6
	1. The Products Violate §§ 201(n) and 403(a) of the FFDCA . . . . .	6
	2. The Products Violate 21 C.F.R. § 101.18(b) . . . . .	7
	B. FDA Should Take Regulatory Action Against Misleading "Whole Wheat" Claims on Product Labeling . . . . .	9
	1. FDA Should Take Enforcement Action Against Keebler and Nabisco . . . . .	10
	2. FDA Should Issue Regulations Establishing Criteria for "Whole Wheat" Label Claims . . . . .	10
V.	ENVIRONMENTAL IMPACT . . . . .	14
VI.	ECONOMIC IMPACT . . . . .	14
VII.	CONCLUSION . . . . .	15

June 25, 1993

Food and Drug Administration  
Dockets Management Branch  
12420 Parklawn Drive  
Room 123  
Rockville, MD 20857

CITIZEN'S PETITION

The Center for Science in the Public Interest (CSPI) submits this petition pursuant to § 4(d) of the Administrative Procedure Act<sup>1</sup> and 21 C.F.R. § 10.30, and pursuant to §§ 201(n), 403(a), and 701(a) of the Federal Food, Drug, and Cosmetic Act (FFDCA),<sup>2</sup> and 21 C.F.R. §§ 101.18(b) and 102.5(b).

I. ACTION REQUESTED

Petitioner requests that the Commissioner of the Food and Drug Administration (FDA) prohibit Keebler Company (Keebler) and Nabisco Brands (Nabisco) from using the term "whole wheat" in the common or usual name, or brand name, to identify products that contain white flour. Use of the term "whole wheat" is only appropriate in the common or usual name, or brand name, if whole wheat flour is the predominant ingredient of a product and the product contains no white flour.

Petitioner further requests that the Commissioner promote consistency throughout the food industry by issuing three types of regulations concerning "whole wheat" claims. First,

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<sup>1</sup> 5 U.S.C. § 553(e).

<sup>2</sup> 21 U.S.C. §§ 321(n), 343(a), and 371(a), respectively.

Petitioner requests that the Commissioner promulgate a regulation prohibiting the use of the term "whole wheat" in the common or usual name or brand name of a product, unless whole wheat flour is the predominant ingredient and the product contains no white flour.

Second, Petitioner requests that the Commissioner promulgate a regulation limiting other types of "whole wheat" claims, such as "made with whole wheat," anywhere else in the product label or labeling, other than in the ingredient listing. In order for a company to make such claims, FDA should require whole wheat flour to be the predominant ingredient and the label must disclose the amount of whole wheat flour the product contains, expressed as a percentage of the total flour ingredient of the product. Such disclosure must be made in immediate proximity to the claim, in type at least one half the size of the "whole wheat" claim.

Finally, for products that contain a distinct flour-based component,<sup>3</sup> Petitioner requests that the Commission promulgate a regulation permitting a "whole wheat" claim only if the claim is expressly limited to the flour-based component and the label discloses the amount of whole wheat flour the component contains, expressed as percentages of the total flour ingredient. For example, a label on a pizza might state: "Made with 100% whole wheat crust." Such disclosure must be made in immediate

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<sup>3</sup> Examples of such products are: frozen pizza, which has a crust distinct from the toppings; cake and pie, which may have fruit filling distinct from the cake or pie crust; and cookies, which may have a cookie component distinct from the fruit filling.

proximity to the claim, in type at least one half the size of the "whole wheat" claim.

## II. INTRODUCTION

The proliferation of "whole wheat" products available on the market is evidence that consumers are aware that whole wheat flour is more nutritious than white flour. Whole wheat flour has higher levels of fiber, vitamins, minerals, and trace elements than ordinary white flour. Health authorities recommend that Americans eat more fiber.<sup>4</sup>

Keebler and Nabisco are trying to capitalize on consumers' concern about health by touting some of their products as "whole wheat," even though these products contain small or insignificant amounts of whole wheat flour and provide no greater amount of dietary fiber or micronutrients than white flour products.

Regulatory action is needed to correct misleading "whole wheat" claims. In addition to stopping the deceptive "whole wheat" claims currently being used, the Commissioner should prevent future deceptive practices by issuing regulations that establish criteria for "whole wheat" claims.

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<sup>4</sup> The relationship between fiber and cancer prevention has been publicized by such public health authorities as the Surgeon General and the National Cancer Institute. See Public Health Services, U.S. Department of Health and Human Service, The Surgeon General's Report on Nutrition and Health, pp. 177-247 (1988); National Institutes of Health, Public Health Service, U.S. Department of Health and Human Services, Diet, Nutrition & Cancer Prevention: A Guide to Food Choices, pp. 4-5 (1987). These authorities recommend increasing the amount of dietary fiber to reduce the risk of some cancers.

### III. STATEMENT OF FACTUAL GROUNDS

Keebler and Nabisco use the term "whole wheat" in the common or usual names, or in brand names, of their cracker products, despite the fact that the primary ingredient in the products is enriched white flour, not whole wheat flour. For example, the primary ingredient in Keebler "Wheatables Whole Wheat Snacks," "Whole Wheat Club Crackers," and "Town House Classic Crackers-Whole Wheat," and Nabisco "Ritz Bits With Whole Wheat" and "Ritz with Whole Wheat" is ordinary enriched wheat flour, not whole wheat flour as the labels indicate.<sup>5</sup> In fact, whole wheat is the third or fourth ingredient listed in the ingredient label of these products.<sup>6</sup> Keebler would not disclose the percentage of whole wheat flour used in its crackers.<sup>7</sup> Nabisco stated that "whole wheat" Ritz crackers' flour ingredient is only eleven percent whole wheat flour; the other eighty-nine percent is enriched white flour.<sup>8</sup>

Keebler and Nabisco further the deception with illustrations

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<sup>5</sup> See ingredient listings for Keebler "Wheatables Whole Wheat Snacks," "Whole Wheat Club Crackers," "Town House Classic Crackers-Whole Wheat" and Nabisco "Ritz With Whole Wheat" and "Ritz Bits With Whole Wheat," attached hereto as Exhibits 1-5, respectively.

<sup>6</sup> With the exception of "Ritz with Whole Wheat," which lists whole wheat flour as the second ingredient.

<sup>7</sup> According to Patty Feltz, a representative with Keebler's Consumer Communications Department, Keebler does not know the percentages of each type of flour used in its products.

<sup>8</sup> According to Taronia Lee, a Consumer Representative at Nabisco.

on the product labels. For instance, Keebler "whole wheat" Town House and Nabisco "whole wheat" Ritz crackers both picture a whole wheat kernel vignette on their back panels.<sup>9</sup> The regular versions of these products do not have such vignettes.<sup>10</sup>

The addition of token amounts of whole wheat flour does not improve the nutritional value of these products significantly. For example, regular Ritz Bits and "whole wheat" Ritz Bits both contain less than 0.5 grams of dietary fiber per serving,<sup>11</sup> an amount that does not contribute significantly to the daily total that authorities recommend.<sup>12</sup> Moreover, the small amount of whole wheat flour added to these products fails to provide significant amounts of the additional vitamins and minerals found in whole wheat flour. White flour is largely stripped of the germ and bran that contain, among other nutrients, vitamins B<sub>1</sub>, B<sub>2</sub>, B<sub>6</sub>, niacin, and vitamin E, as well as folic and pantothenic acids and important minerals and trace elements (including

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<sup>9</sup> See labels for Keebler "whole wheat" Town House and Nabisco "whole wheat" Ritz crackers, attached hereto as Exhibits 3 and 4, respectively.

<sup>10</sup> Compare labels for non-whole wheat products, attached hereto as Exhibits 6-9.

<sup>11</sup> This information was provided by Tarona Lee, a Consumer Representative with Nabisco. According to Patty Feltz, a representative with Keebler's Consumer Communications Department, Keebler does not measure the dietary fiber in its products.

<sup>12</sup> FDA recommends a minimum of twenty-five grams of fiber per person per day. See 58 Fed. Reg. 2227 (1993) (codified at 21 C.F.R. 101.9(c)(9)). (Effective May 8, 1994). See also Diet, Nutrition & Cancer Prevention: A Guide to Food Choices at 4 (recommending that individuals consume between twenty and thirty grams of fiber per day).

chromium, copper, iron, magnesium, manganese, and zinc). The bran is a source of dietary fiber. Enrichment of white flour restores iron and vitamins B<sub>1</sub>, B<sub>2</sub>, and niacin, but fails to restore these other important nutrients.

#### IV. STATEMENT OF LEGAL GROUNDS

##### A. Keebler and Nabisco "Whole Wheat" Products Are Misbranded.

Products that use the term "whole wheat" in their common or usual names, or brand names, are misleading and, therefore, misbranded if they contain white flour.

##### 1. The Products Violate Sections 201(n) and 403(a) of the FFDCA.

Keebler and Nabisco "whole wheat" label claims violate the misbranding provisions of the FFDCA.<sup>13</sup> Under § 403(a) of the FFDCA, a food is deemed to be misbranded if its labeling is "false and misleading in any particular." In determining whether the labeling is misleading, § 201(n) of the FFDCA calls for examination of the representations made or suggested on the label and "the extent to which the labeling . . . fails to reveal facts material in the light of such representations. . . ."<sup>14</sup>

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<sup>13</sup> "Misbranding was one of the chief evils Congress sought to stop" when it enacted the amendments to the FFDCA that prohibit misleading labeling. 62 Cases of Jam v. United States, 340 U.S. 596 (1951).

<sup>14</sup> A product label may be technically accurate and still be misleading under § 403(a). It is not necessary to show that anyone was actually misled, or that there was any intent to deceive. United States v. 95 Barrels-Cider Vinegar, 265 U.S. 438, 442-43 (1923). See also United States v. An Article of



The Keebler and Nabisco products are misbranded under §§ 201(n) and 403(a) of the FFDCA because consumers are misled by false representations made on the label or labeling and because of the products' failure to reveal material facts in light of those representations. The "whole wheat" claims and vignettes on the principal display panels create the false impression that the products contain only whole wheat flour when, in fact, the predominant flour used in these products is white flour.<sup>15</sup> Furthermore, products labeled as "made with whole wheat," but which fail to disclose the percentage of whole wheat flour which they contain, omit material facts. Such omissions are material because consumers purchase these products believing that their whole wheat content provides a nutritional advantage over similar products made with white flour.

2. The Products Violate 21 C.F.R. § 101.18(b).

The labels of the Keebler and Nabisco products are also

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Food...Nuclomin, 482 F.2d 581, 585 (2nd Cir. 1973); United States v. An Article of Food, 377 F. Supp. 746, 749 (E.D.N.Y. 1974).

<sup>15</sup> The extent to which the food industry has substituted white flour for whole wheat flour is illustrated by so-called "graham" products. Webster's Dictionary defines "graham flour" as "whole wheat flour" and "graham cracker" as "a slightly sweet cracker made of whole wheat flour." See Exhibit 10. However, Keebler "Graham Crackers" and "Honey Grahams," Nabisco "Honey Maid Honey Grahams" and "Teddy Grahams" all list white flour as the primary ingredient. Attached hereto as Exhibits 11-14, respectively.

The food industry's use of the term "graham" to describe products made primarily from white flour is misleading. CSPI urges the Commissioner to put an end to this abuse, and regulate the use of the term "graham" in the same manner as other "whole wheat" claims.

misleading under 21 C.F.R. § 101.18(b). Under this regulation:

The labeling of a food which contains two or more ingredients may be misleading by reason (among other reasons) of the designation of such food in such labeling by a name which includes or suggests the name of one or more but not all such ingredients, even though the names of all such ingredients are stated elsewhere in the labeling.<sup>16</sup>

The Nabisco and Keebler products violate this regulation because the use of the term "whole wheat" in their names emphasizes the minor ingredient of whole wheat over all other ingredients.

FDA recently enforced this regulation to prohibit Sunshine Biscuits, Inc. (Sunshine) from making similar "whole wheat" claims. In a letter dated April 1, 1992, FDA warned Sunshine that its products "HiHo Deluxe WHOLE WHEAT Crackers" and "Krispy WHOLE WHEAT Saltine Crackers" were misbranded because they emphasized the ingredient whole wheat flour on the primary display panel even though whole wheat was not the predominant ingredient.<sup>17</sup> Although Sunshine has since improved its labels, the change does not eliminate the deception completely.<sup>18</sup>

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<sup>16</sup> 21 C.F.R. § 101.18(b).

<sup>17</sup> See FDA warning letter to Mr. Arthur G. Murray, President, Sunshine Biscuits, Inc., attached hereto as Exhibit 15.

<sup>18</sup> Sunshine changed its labels for these products to "Krispy MADE WITH ENRICHED FLOUR AND WHOLE WHEAT FLOUR Saltine Crackers" and "HiHo Deluxe Crackers MADE WITH ENRICHED FLOUR AND WHOLE WHEAT FLOUR." This change failed to eliminate the deception because the labels still use the term "whole wheat" on their principal display panels without disclosing the percentage of whole wheat in the products. CSPI urges further action against Sunshine consistent with this petition. See Exhibits 16 and 17, respectively.

Moreover, despite the warning to Sunshine, Keebler and Nabisco continue to make the same violation.<sup>19</sup>

**B. FDA Should Take Regulatory Action Against Misleading "Whole Wheat" Claims on Product Labeling.**

In order to avoid consumer deception and confusion, FDA should take action to remedy misleading "whole wheat" claims on product labels.<sup>20</sup>

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<sup>19</sup> While the Keebler and Nabisco products are the most glaring examples of misleading "whole wheat" claims, they are by no means the only such products on the market. Pepperidge Farm manufactures "Cracked Wheat" crackers, a name which suggests whole wheat. The first ingredient on the list is unbleached enriched wheat flour, while cracked wheat is third on the list. According to Lori Warfield, a Pepperidge Farm service representative, the product contains only one gram of fiber per serving, below the level needed to make a source claim for fiber. Frito Lay manufactures "Sun Chips," which has a wheat vignette and bears the common or usual name "Multigrain Snacks." These representations suggest that the product is made primarily from whole grain, which it is not. According to Mindy Thompson, a consumer affairs representative for Frito Lay, the product contains only 1.8 grams of fiber per serving, also short of the level needed to make a source claim for fiber, attached hereto as Exhibits 18 and 19, respectively.

<sup>20</sup> Such action would be in accordance with FDA's current enforcement policy against implied nutrient content claims, as codified at 21 C.F.R. § 101.65 (Effective May 8, 1994). The preamble to the final rule states that "The Agency considers that a claim that a product contains a whole grain, a bran, or any type of dietary fiber (such as soluble fiber) implies that the product is a good source of total dietary fiber. Such a claim would therefore be misleading if the product did not contain sufficient fiber derived largely from the sources mentioned such that the product met the definition for 'good source of dietary fiber'." See 58 Fed. Reg. 2374 (1993). In order to make a "good source" claim for fiber, a product must contain at least ten percent of the daily reference value (DRV) of a nutrient. See 58 Fed. Reg. 2414 (1993). The DRV for fiber is twenty-five grams. See 58 Fed. Reg. 2227 (1993). Therefore, in order to make a "good source" claim for fiber, a product must contain at least 2.5 grams of fiber per serving. See 58 Fed. Reg. 2227, 2414 (1993).

None of the Keebler or Nabisco products discussed here

1. FDA Should Take Enforcement Action Against Keebler and Nabisco.

FDA should immediately issue warning letters to Keebler and Nabisco, as well as other food manufacturers making misleading "whole wheat" label claims. These companies should be prohibited under §§ 403(a) and 201(n) of the FFDCA and 21 C.F.R. § 101.18(b) from using the term "whole wheat" to identify a product, in the common or usual name, or brand name, unless whole wheat flour is the predominant ingredient and the product contains no white flour.

2. FDA Should Issue Regulations Establishing Criteria for "Whole Wheat" Label Claims.

The Commissioner should also use the authority granted under § 701(a) of the FFDCA to regulate the use of the term "whole wheat" throughout the food industry, including makers of waffles, pot pies, and pizzas, among others.<sup>21</sup> First, the Commissioner should issue a regulation prohibiting the use of the term "whole wheat" in common or usual names, or brand names, unless the predominant ingredient in the product is whole wheat flour and the product contains no white flour. A product that is not made predominantly from whole wheat flour, or that contains whole wheat flour in combination with another flour or flours should

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satisfy that requirement, and therefore all of the products make implied nutrient content claims in violation of 21 C.F.R. § 101.65.

<sup>21</sup> "The authority to promulgate regulations for the efficient enforcement of [the FFDCA] . . . is hereby vested in the Secretary." Federal Food, Drug, and Cosmetic Act, § 701(a), 21 U.S.C. § 371(a) (1938).

not be allowed to state the words "whole wheat," or make representations of whole wheat, in its common or usual name, or brand name.

CSPI proposes the text of such a regulation to read:

The term "whole wheat," or any vignette or other representation thereof, can only be used to identify a product, such as in the common or usual name, or brand name, when whole wheat (graham) flour, bromated whole wheat flour, whole wheat durum flour or a combination of any whole wheat flours is the predominant ingredient and the product contains no white flour, bromated flour, phosphated flour, or any other non-whole wheat flour.<sup>22</sup>

Second, the Commissioner should issue a regulation pertaining to the use of the term "whole wheat," or representations of whole wheat, anywhere on the label or labeling other than in the ingredient listing, unless the term is used to modify a distinct flour-based component of a product, such as a crust, wafer, or pasta. This regulation would control such claims as "made with whole wheat," "with the goodness of whole wheat," whole wheat vignettes, etc., that companies may use on other parts of the label or labeling. In order to make such claims, whole wheat flour should be the predominant ingredient

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<sup>22</sup> Such a regulation is analogous to the standards of identity for other whole wheat products. For example, the standard of identity for "whole wheat bread, rolls, and buns" requires that the flour ingredient of these products consists only of whole wheat flour or bromated whole wheat flour. "No [other type of] flour is used." See 21 C.F.R. § 136.180(a)(1). Similarly, the standard of identity for "whole wheat macaroni products" requires that these products use whole wheat flour and/or whole durum wheat flour as the sole wheat ingredient. See 21 C.F.R. § 139.138(a)(1). Thus, FDA's existing regulations concerning "whole wheat" products show a clear intent to ensure that the flour ingredient in products labeled as "whole wheat" consists of one hundred percent whole wheat flour.

and the label should disclose the amount of whole wheat flour the product contains, expressed as a percentage of the flour ingredient of the product.<sup>23</sup> Such disclosure must be made in immediate proximity to the claim, in type at least one half the size of the "whole wheat" claim.<sup>24</sup>

CSPI proposes the text of such a regulation to read:

The term "whole wheat," or any vignette or other representation thereof, can be used on the label or labeling of a product other than in the ingredient listing, when the product consists predominantly of whole wheat (graham) flour, bromated whole wheat flour, whole wheat durum flour or a combination of any whole wheat flours and the label discloses the amount of whole wheat flour the product contains, expressed as a percentage of the total flour ingredient of the product. Such disclosure must be made in immediate proximity to such terms, vignettes, or representations in type size at least one-half the size of the claim.

Finally, for a product with a distinct flour-based component that constitutes at least ten percent of the product by weight,<sup>25</sup>

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<sup>23</sup> Similar regulations should also be promulgated for non-whole-wheat breads and other products that are made and packaged so as to appear to be made from whole wheat, but that do not make express "whole wheat" claims. For example, calling a bread "wheat bread" is likely to mislead many consumers into thinking the product is whole wheat bread. Pepperidge Farm "Light Style" bread has the word "wheat" printed prominently in several places on the label. Additionally, the molasses ingredient gives the bread a color similar to whole wheat bread. The predominant ingredient is refined white flour. Safeway "Mrs. Wright Lite" bread bears the common or usual name "Reduced Calorie Wheat Bread," (emphasis added) and uses brown packaging to make the product look like whole wheat bread. The predominant ingredient is refined white flour. Attached as exhibits 20 and 21, respectively.

<sup>24</sup> See 58 Fed. Reg. 2358 (1993).

<sup>25</sup> The minimum threshold of ten percent flour-based dough component, by weight, is intended to prevent de minimis "whole wheat" claims based on nutritionally insignificant amounts of whole wheat. Absent such a threshold, a cookie product made with

Petitioner requests a regulation permitting "whole wheat," "made with whole wheat," or similar claims only if the claim is expressly limited to the flour-based component and the label discloses the amount of whole wheat flour the product contains, expressed as a percentage of the total flour ingredient of the flour-based component.<sup>26</sup> Such disclosure must be made in immediate proximity to the claim, in type at least one half the size of the "whole wheat" claim.

CSPI proposes the text of such a regulation to read:

For a product that contains a distinct flour-based component that constitutes a minimum of ten percent of the product, by weight, the term "whole wheat," "made with whole wheat," or any other representation thereof, may be used on the label or labeling, other than in the ingredient listing, when the term "whole wheat" expressly modifies the flour-based component of the product and the label discloses the amount of whole wheat (graham) flour, bromated whole wheat flour, whole wheat durum flour or a combination of any whole wheat flours, phosphated flour, or any other non-whole wheat flour the product contains, expressed as a percentage of the flour component. Such disclosure must be made in immediate proximity to such terms or representations, in type size at least one-half the size of the claim.

In addition to benefitting consumers, industry-wide regulations will create a level playing field and promote fair competition among food manufacturers. Currently, there is no

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sixty percent chocolate, thirty percent marshmallow, five percent whole wheat flour, and five percent other ingredients could make the following label claim: "cookie dough made with one hundred percent whole wheat."

<sup>26</sup> Under this regulation, for example, a chicken pot pie label would be permitted to make the following whole wheat claim: "Pie crust made with ninety percent whole wheat flour and ten percent white flour."

incentive for manufacturers to make products with nutritionally significant amounts of whole wheat flour since their competitors substitute white flour and still use the description "whole wheat." Manufacturers of products containing whole wheat flour should have a way of distinguishing their products from those that contain white flour.<sup>27</sup> Regulation in this area constitutes sound public policy, for it would benefit public health and foster competition.

#### V. ENVIRONMENTAL IMPACT

The action requested in this petition does not fall within the categories of actions requiring an environmental impact statement under 21 C.F.R. § 25.21 or an environmental assessment under 21 C.F.R. § 25.22. The action requested is of a type that does not individually or cumulatively have a significant effect on the human environment.

#### VI. ECONOMIC IMPACT

No statement of the economic impact of the action requested in this petition is required at this time under 21 C.F.R. § 10.30(b).

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<sup>27</sup> For example, the only flour used in Nabisco "Triscuit Whole Wheat Wafers" is whole wheat flour. See "Triscuit" label, attached hereto as Exhibit 22. Currently, many consumers will not distinguish the truthfully labeled Nabisco whole wheat "Triscuits" from that same company's deceptively labeled "Ritz Bits with Whole Wheat."



## **VII. CONCLUSION**

For the foregoing reasons, Petitioner urges the Commissioner of FDA to take action pursuant to §§ 201(n) and 403(a) of the FFDCA and 21 C.F.R. §§ 101.18(b) to stop Keebler and Nabisco from using the term "whole wheat" to identify their products, such as in the common or usual names, or brand names, unless whole wheat flour is a product's predominant ingredient and the product contains no white flour.

Furthermore, the Commissioner should initiate rulemaking proceedings pursuant to § 701(a) of the FFDCA to require that products that use the term "whole wheat," such as in the common or usual names, or brand names, contain whole wheat flour as their predominant ingredient and contain no white flour.

In addition, the Commissioner should initiate rulemaking proceedings to require that other types of general "whole wheat" claims be made only if whole wheat flour is a product's predominant ingredient and the label discloses the amount of wheat flour the product contains, expressed as a percentage of the product's total flour ingredient. Such disclosure should be made in immediate proximity to such claims, in type size at least one half the size of the claim.

Finally, for a product with a distinct flour-based component, which constitutes at least ten percent of the product's total weight, Petitioner requests a regulation permitting "whole wheat" claims only if the claim is expressly limited to the flour-based component and the label discloses the

amount of whole wheat flour the product contains, expressed as a percentage of the flour-based component. Such disclosure must be made in immediate proximity to the claim, in type at least one half the size of the "whole wheat" claim.

CERTIFICATION

The undersigned certify that, to the best knowledge and belief of the undersigned, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to the Petitioner which are unfavorable to the petition.

Respectfully submitted,

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John M. Gleason  
Senior Staff Attorney



# Wheatables®

Whole Wheat Snacks

EXHIBIT



# Wheatables®



Wheatable  
Whole  
Wheat Snacks

Whole Wheat Snacks

**Irresistibly  
Snappy  
Taste!**

**NUTRITION INFORMATION (per serving)**

Serving Size	12 Crackers
	Approx. 1 1/2 oz.
Servings per Container	14
Calories	70
Protein	1 gram
Carbohydrate	8 grams
Fat	3 grams
Polyunsaturated	less than 1 gram
Saturated	less than 1 gram
Cholesterol	0 milligram
Sodium	150 milligram
Potassium	55 milligram

**PERCENTAGE OF THE U.S. RECOMMENDED  
DAILY ALLOWANCES (U.S. RDA)**

PROTEIN	.....
VITAMIN A	.....
VITAMIN C	.....
THIAMINE	.....
RIBOFLAVIN	.....
NIACIN	.....
CALCIUM	.....
IRON	.....

\*Contains less than 2% of the U.S. RDA of this nutrient.

**INGREDIENTS:** ENRICHED WHEAT FLOUR (CONTAINING NIACIN, REDUCED IRON, THIAMINE MONONITRATE (VITAMIN B1) AND RIBOFLAVIN (VITAMIN B2)), VEGETABLE SHORTENING (PARTIALLY HYDROGENATED SOYBEAN AND/OR COTTONSEED OIL), DEHYDRATED POTATOES, STEAMED CRUSHED WHEAT, SALT, SUGAR, DEFATTED WHEAT GERM, CORN SYRUP, MALT, ONION POWDER, MONOSODIUM GLUTAMATE, SOY LECITHIN, SODIUM BICARBONATE, SPICE, NATURAL FLAVOR.

REG. PENNA. DEPT. AGR.      MADE IN U.S.

Every product from Keebler is meant to be Uncommon Good. Should you have reason to write us regarding a product, please send your comments, along with top 100 box with stamped-in code to: Keebler Company, Consumer Relations, 1 Homewood Lane, Elmhurst, IL 60120.

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**KEEBLER COMPANY**  
ELMHURST, ILLINOIS 60120

NET WT. 7 OZ. (198g)



# Wheatables®

Whole Wheat Snacks



# Wheatables®

## Whole Wheat Snacks

The Keebler Elves are baking up a bite-size snack cracker with carefully selected wholesome ingredients...for a very special taste.

Wheatables whole wheat snacks from Keebler.

Wheatables begin with wheat flour, wheat germ, and crushed whole wheat kernels. Then the elves add a whisper of special seasonings. The result is tasty, delicate, and unique to the cracker world.

You've never tasted anything like it.

Wheatables from Keebler are the whole wheat snack cracker with the irresistibly snappy taste!



# Wheatables

## Whole Wheat Snacks



TO OPEN, LIFT F  
TO RECLOSE, PRESS

EXHIBIT 2



Whole Wheat  
**CLUB**  
CRACKERS

**3**  
Reclosable  
Stay-Fresh  
Packs



Simply,  
twist  
the top...

Or, roll  
down  
to seal in  
freshness



Whole Wheat  
**CLUB**

CRACKERS

*Light, Flaky...  
Delicious*



NET WT. 16 OZ.  
(1 LB.) 453g

**1 POUNDER**



# Whole Wheat CLUB®

CRACKERS

*Light, Flaky...  
Delicious*

#### NUTRITION INFORMATION (Per Serving)

Serving Size	4 crackers (Approx. 1/2 oz.)
Servings per Container	32
Calories	70
Protein	1 gram
Carbohydrate	9 grams
Fat	3 grams
Polyunsaturated	less than 1 gram
Saturated	1 gram
Cholesterol	0 milligrams
Sodium	55 milligrams
Potassium	10 milligrams

#### PERCENTAGE OF THE U.S. RECOMMENDED DAILY ALLOWANCES (U.S. RDA)

Protein	2%
Vitamin A	0%
Vitamin C	0%
Thiamine	4%
Riboflavin	2%
Niacin	2%
Calcium	2%
Iron	2%

\*Contains less than 2% of the U.S. RDA of this nutrient.

**INGREDIENTS:** ENRICHED WHEAT FLOUR CONTAINING NIACIN, REDUCED IRON, THIAMINE MONONITRATE (VITAMIN B1) AND RIBOFLAVIN (VITAMIN B2), VEGETABLE SHORTENING (PARTIALLY HYDROGENATED SOYBEAN AND/OR COTTONSEED OILS), CRUSHED WHOLE WHEAT MALT SUGAR, CONTAINS 2 PERCENT OR LESS OF DEFATTED WHEAT GERM, SALT, HIGH FRUCTOSE CORN SYRUP, CORN SYRUP, LEAVENING (SODIUM BICARBONATE, SODIUM ACID PYROPHOSPHATE, MONOCALCIUM PHOSPHATE), SPICE, ONION POWDER, TOASTED SESAME MEAL, GARLIC POWDER, REG. PENNA. DEPT. AGR.

MADE IN U.S.A.

Every product from Keebler is meant to be uncommonly good. Should you have reason to write us regarding this product, please send your comments, along with top flap of box with stamped-in code to: Keebler Company, Consumer Relations, 1 Hollow Tree Lane, Elmhurst, IL 60126.

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**KEEBLER COMPANY**  
ELMHURST, ILLINOIS 60126

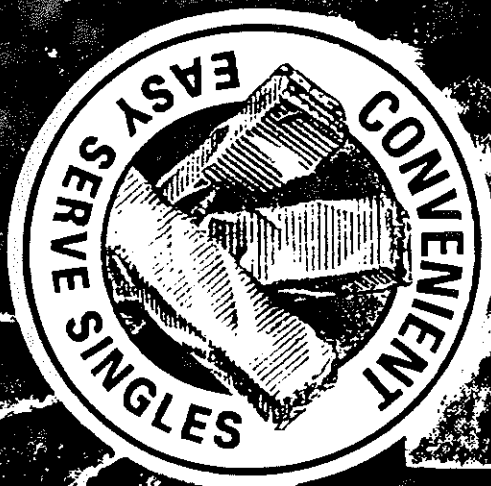
1 POUNDER

NET WT. 16 OZ. (1 LB.) 453g

Whole Wheat

CRACKERS  
*Light, Flaky...  
Delicious*

# Whole Wheat CLUB®



CRACKERS

**CLUB®**  
Whole Wheat



WHOLE WHEAT CLUB

30100 03820





EXHIBIT



**TOWN  
HOUSE**  
CLASSIC CRACKERS  
*Whole Wheat*



**TOWN  
HOUSE**  
CLASSIC CRACKERS  
*Whole Wheat*

Try these other  
delicious TownHouse®  
Classic Crackers

**TOWN  
HOUSE**

Rich, buttery-tasting  
Original...

**TOWN  
HOUSE**

*Low Salt*

...and Low Salt



**TOWN  
HOUSE**  
CLASSIC CRACKERS  
*Whole Wheat*

**1 POUNDER**



**TOWN  
HOUSE**  
CLASSIC CRACKERS  
*Whole Wheat*

PROOF OF PURCHASE



30100 67256  
WHOLE WHEAT TOWNHOUSE 16 OZ.



# TOWN HOUSE

CLASSIC CRACKERS

*Whole Wheat*

NUTRITION INFORMATION (Per Serving)	
Serving Size	4 crackers (Approx. 1/2 oz.)
Servings per Container	25
Calories	70
Protein	4 grams
Carbohydrate	8 grams
Fat	3 grams
Polyunsaturated	less than 1 gram
Saturated	less than 1 gram
Cholesterol	0 grams
Sodium	700 milligrams
Potassium	10 milligrams

PERCENTAGE OF THE U.S. RECOMMENDED  
DAILY ALLOWANCES (U.S. RDA)

Protein	8%
Vitamin A	4%
Vitamin C	4%
Thiamine	4%
Riboflavin	2%
Niacin	2%
Calcium	2%
Iron	2%

\*Contains less than 2% of the U.S. RDA of this nutrient.

INGREDIENTS: ENRICHED WHEAT FLOUR CONTAINING NIACIN, REDUCED IRON, THIAMINE MONONITRATE (VITAMIN B1) AND RIBOFLAVIN (VITAMIN B2), VEGETABLE SHORTENING (PARTIALLY HYDROGENATED SOYBEAN AND/OR COTTONSEED OILS), CRUSHED WHOLE WHEAT, MALT, SALT, CORN SYRUP, CONTAINS 2 PERCENT OR LESS OF DEFAINED WHEAT GERM, LEAVENING (SODIUM BICARBONATE, SODIUM ACID PYROPHOSPHATE, MONOCALCIUM PHOSPHATE), SPICE, ONION POWDER, TOASTED SESAME MEAL, GARLIC POWDER.

REG. PENNA. DEPT. AGR. MADE IN U.S.A.

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ELMHURST, ILLINOIS 60126



# TOWN HOUSE

CLASSIC CRACKERS

*Whole Wheat*

Only the Keebler® Elves could combine the rich taste of TownHouse® and the natural goodness of hearty whole wheat.

Enjoy these light, flaky whole wheat crackers today. They're delicious right from the box or with your favorite toppings.



EXHIBIT

EAST  
TAB

TO CLOSE - PUSH HERE



This package is sold by weight, not by volume. Packed as full as practicable by modern automatic equipment, it contains full net weight indicated. If it does not appear full when opened, it is because contents have settled during shipping and handling.

NET WT 11 1/4 OZ 319 grams

No Cholesterol  
2 GRAMS FAT PER SERVING  
Low Saturated Fat  
Low Sodium

C-51-362-2V2



PRICE

TO OPEN - SLIDE FINGER UNDER FLAP AND LOOSEN GENTLY

# RITZ CRACKERS

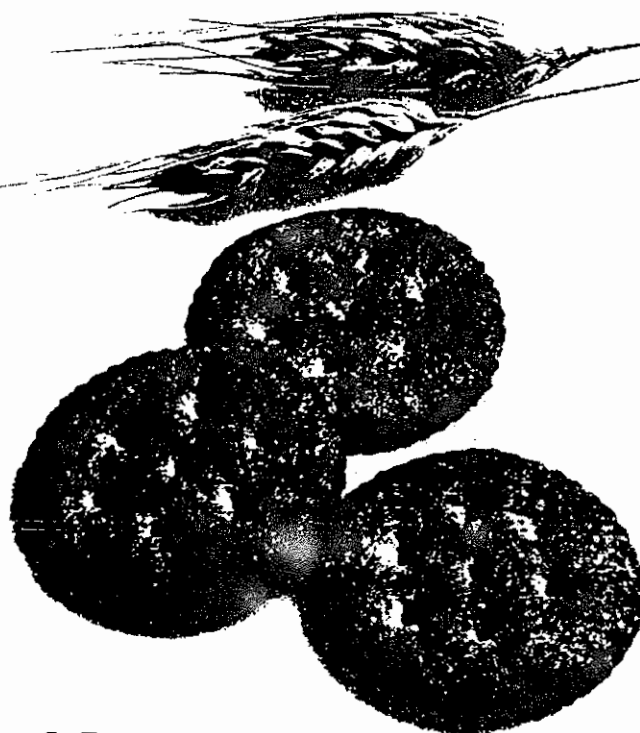
with Whole Wheat...

- Low Cholesterol
- Low Saturated Fat
- Low Sodium

NUTRITION INFORMATION	
PER SERVING	
SERVING SIZE	1/2 OUNCE
	(ABOUT 5 CRACKERS)
SERVINGS PER PACKAGE	22 1/2
CALORIES	60
PROTEIN	1 GRAM
CARBOHYDRATE	10 GRAMS
FAT	2 GRAMS
POLYUNSATURATED	1 GRAM
SATURATED	1 GRAM
CHOLESTEROL	0 MILLIGRAMS
SODIUM	135 MILLIGRAMS
*CONTAINS LESS THAN 1 GRAM	
PERCENTAGE OF U.S. RECOMMENDED	
DAILY ALLOWANCES (U.S. RDA)	
PROTEIN	2 RIBOFLAVIN
VITAMIN A	* NIACIN
VITAMIN C	* CALCIUM
THIAMINE	2 IRON
**CONTAINS LESS THAN 2% OF THE	
U.S. RDA OF THESE NUTRIENTS.	
INGREDIENTS: ENRICHED WHEAT	
FLOUR (CONTAINS NIACIN, REDUCED	
IRON, THIAMINE MONONITRATE (VIT-	
AMIN B1), RIBOFLAVIN (VITAMIN B2),	
WHOLE WHEAT FLOUR, VEGETABLE	
SHORTENING (PARTIALLY HYDRO-	
GENATED SOYBEAN OIL), SUGAR,	
HIGH FRUCTOSE CORN SYRUP, LEAV-	
ENING (CALCIUM PHOSPHATE AND	
BAKING SODA), MALTED BARLEY	
FLOUR, SALT AND SOY LECITHIN	
(EMULSIFIER).	

# Ritz with Whole Wheat.

Great Ritz taste  
with the added goodness  
of Whole Wheat.



Now you can enjoy the delicious Ritz taste  
you've come to know and love with the subtle taste of  
whole wheat. Plus, Ritz with Whole Wheat has  
no cholesterol and is low in saturated fat and sodium.



East Hanover,  
NJ 07936

Made in U.S.A. - Reg. Penna. Dept. Agr.  
Local Bakeries... Coast to Coast  
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When writing to us, please enclose the  
EASY-TAB flap, or call 1-800-932-7800,  
weekdays, 9:00 AM-7:30 PM, EST.



4714

EXHIBIT



**NEW!**

# RITZ bits®

## Whole Wheat

**RITZBITS®**  
with Whole Wheat

- No Cholesterol
- Low Saturated Fat
- Low Sodium

**NUTRITION INFORMATION**  
PER SERVING

SERVING SIZE 1/2 OUNCE (26 CRACKERS)

SERVINGS PER PACKAGE

CALORIES

PROTEIN 1 GRAM

CARBOHYDRATE 9 GRAMS

FAT 3 GRAMS

POLYUNSATURATED

SATURATED

CHOLESTEROL 0 MILLIGRAMS

SODIUM 135 MILLIGRAMS

\* CONTAINS LESS THAN 1 GRAM

PERCENTAGE OF U.S. RECOMMENDED DAILY ALLOWANCES (U.S. RDA)

PROTEIN 2 RIBOFLAVIN

VITAMIN A NIACIN

VITAMIN C CALCIUM

THIAMINE IRON

\*\* CONTAINS LESS THAN 2% OF THE U.S. RDA OF THESE NUTRIENTS

INGREDIENTS: ENRICHED WHEAT FLOUR (CONTAINS NIACIN, REDUCED IRON, THIAMINE MONONITRATE [VITAMIN B1], RIBOFLAVIN [VITAMIN B2], VEGETABLE SHORTENING (PARTIAL HYDROGENATED SOYBEAN OIL), WHOLE WHEAT FLOUR, SUGAR, HIGH FRUCTOSE CORN SYRUP, SALT, LEAVENING (CALCIUM PHOSPHATE AND BAKING SODA), MALTED BARLEY FLOUR, AND SOY LECITHIN (EMULSIFIER)

This package is sold by weight, not by volume. Packed as full as practicable by modern automatic equipment; it contains full net weight indicated. If it does not appear full when opened, it is because contents have settled during shipping and handling.



East Hanover, NJ 07936

Contents made in Canada

Reg. Penna. Dept. Agr.

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When writing to us, please

enclose the EASY-TAB flap or

call 1-800-932-7800, weekdays

9:00 AM-7:30 PM, EST

**No Cholesterol**

3 GRAMS FAT PER SERVING

**Low Saturated Fat**

**Low Sodium**

NET WT 9 OZ 255 grams

4783 X



3

# RITZ® bits® with Whole Wheat.

Great RITZ  
taste with the  
added goodness  
of whole wheat.

PLUS... • NO CHOLESTEROL  
• LOW SATURATED FAT  
• LOW SODIUM

Three fun  
mini RITZ sizes!

Try all four great tasting RITZ bits varieties!



Whole Wheat

Snack Time!

Fun Time!

Anytime!

Great RITZ  
Taste!  
Great Snacking!  
Fun!

PRICE



BRAND SEAL  
RITZ bits  
with Whole Wheat



C51-847-4V1



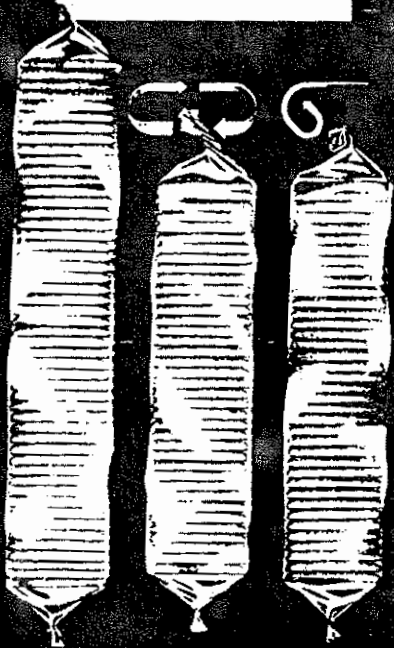
TO OPEN, LIFT FLAP  
TO RECLOSE, PRESS IN FL

EXHIBIT C



**CLUB**  
CRACKERS

**3**  
Reclosable  
Stay-Fresh  
Packs



Simply,  
twist  
the top...

Or, roll  
down  
to seal in  
freshness



**CLUB**

**CRACKERS**

*Light, Flaky...  
Delicious*



NET WT. 16 OZ.  
(1 LB.) 453g

**1 POUNDER**





# CLUB

CRACKERS

*Light, Flaky...  
Delicious*

1 POUNDER

NET WT. 16 OZ. (1 LB.) 453g

**NUTRITION INFORMATION (per serving)**

Serving Size	4 crackers (approx. 1/2 oz.)
Servings per Container	32
Calories	60
Protein	1 gram
Carbohydrate	9 grams
Fat	3 grams
Polyunsaturated	less than 1 gram
Saturated	less than 1 gram
Cholesterol	0 milligrams
Sodium	150 milligrams
Potassium	20 milligrams

**PERCENTAGE OF THE U.S. RECOMMENDED DAILY ALLOWANCES (U.S. RDA)**

Protein	2
Vitamin A	2
Vitamin C	2
Thiamine	2
Riboflavin	2
Niacin	2
Calcium	2
Iron	2

\*Contains less than 2% of the U.S. RDA for each nutrient.

**INGREDIENTS:** ENRICHED WHEAT FLOUR CONTAINING NIACIN, REDUCED IRON, THIAMINE MONONITRATE (VITAMIN B<sub>1</sub>) AND RIBOFLAVIN (VITAMIN B<sub>2</sub>), VEGETABLE SHORTENING (PARTIALLY HYDROGENATED SOYBEAN AND/OR COTTONSEED OILS), SUGAR, SALT, CORN SYRUP, LEAVENING (SODIUM BICARBONATE, SODIUM ACID PYROPHOSPHATE, MONOCALCIUM PHOSPHATE) REG. PENNA. DEPT. AGA. MADE IN U.S.A.

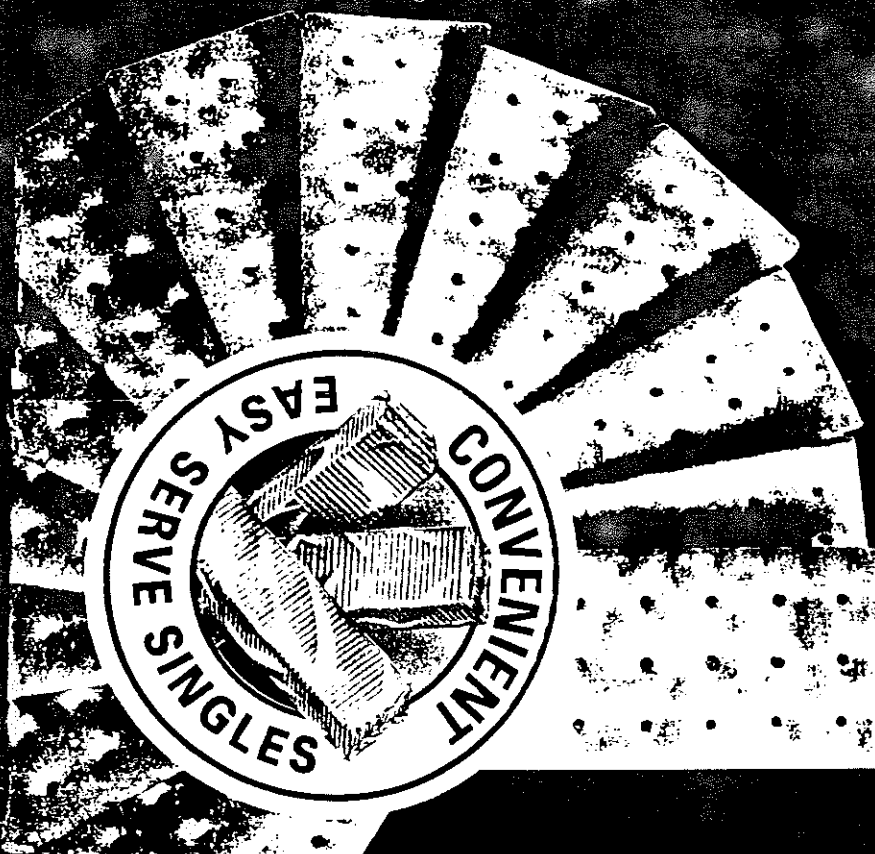
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ELMHURST, ILLINOIS 60126



CRACKERS  
*Light, Flaky...  
Delicious*

# CLUB



CLUB  
CRACKERS

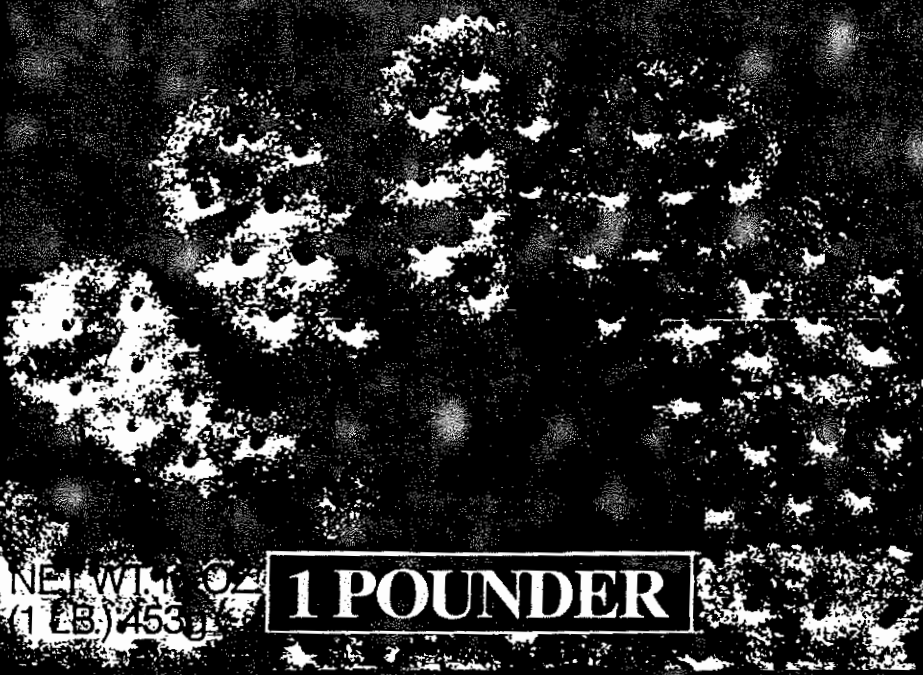




**TOWN  
HOUSE**  
CLASSIC CRACKERS



**TOWN  
HOUSE**  
CLASSIC CRACKERS



NET WT. 1 LB. (1 LB.) 453g

**1 POUNDER**



**TOWN  
HOUSE**  
CLASSIC CRACKERS

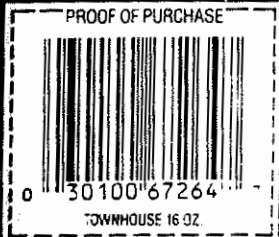


EXHIBIT 7



**TOWN  
HOUSE**  
CLASSIC CRACKERS

NUTRITION INFORMATION (Per Serving)

Serving Size	1 cracker
Servings per Container	12 (12)
Calories	10
Protein	1 gram
Carbohydrate	8 grams
Fat	4 grams
Saturated	1 gram
Unsaturated	1 gram
Cholesterol	0 milligrams
Sodium	120 milligrams
Potassium	10 milligrams

PERCENTAGE OF THE U.S. RECOMMENDED DAILY ALLOWANCES (U.S. RDA)

Vitamin A	1
Vitamin C	1
Thiamine	2
Riboflavin	2
Niacin	2
Calcium	1
Iron	2

INGREDIENTS: ENRICHED WHEAT FLOUR CONTAINING NIACIN, REDUCED IRON, THIAMINE MONONITRATE (VITAMIN B1) AND RIBOFLAVIN (VITAMIN B2), VEGETABLE SHORTENING (PARTIALLY HYDROGENATED SOYBEAN AND/OR COTTONSEED OILS), SUGAR, SALT, LEAVENING (SODIUM BICARBONATE, SODIUM ACID PHOSPHATE, MONOCALCIUM PHOSPHATE), CORN SYRUP, HIGH FRUCTOSE CORN SYRUP.

REG. FENNA DEPT. AGR. MADE IN U.S.A.

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# TOWN HOUSE®

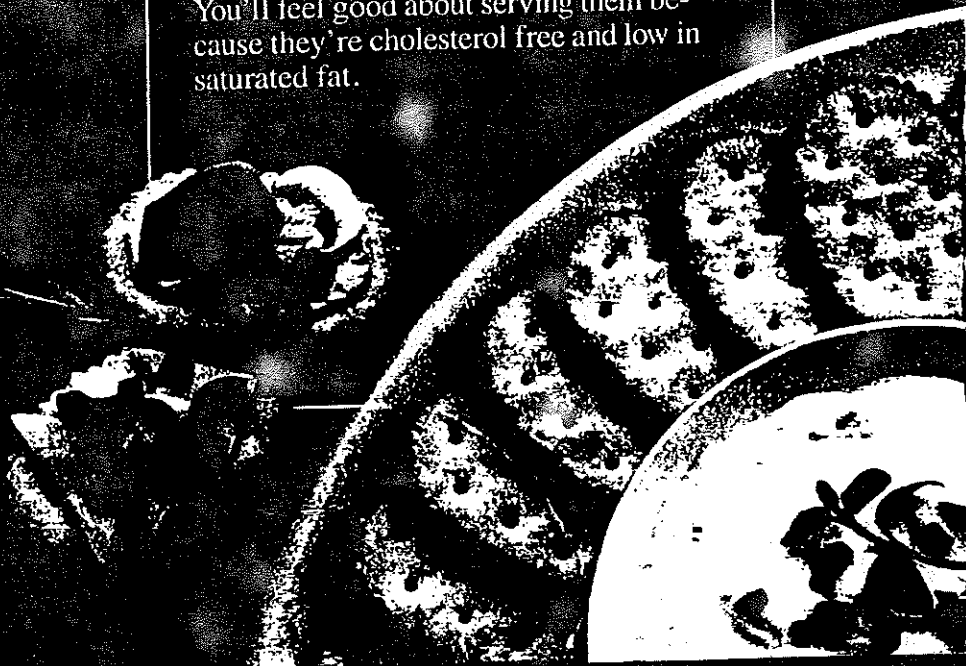
CLASSIC CRACKERS



TownHouse Crackers have a rich, buttery taste that's in a class by itself.

They're absolutely irresistible right out of the box or try them with dip or a special topping and discover what quality ingredients and a little elfin magic can do.

You'll feel good about serving them because they're cholesterol free and low in saturated fat.



# TOWN HOUSE®

CLASSIC CRACKERS

## ROAST BEEF APPETIZERS

(Pictured on back panel)

On a TownHouse Cracker, layer mustard sauce, sliced roast beef and sliced mushroom. Garnish with savory (optional).

## MEXI-MELT APPETIZERS

(Pictured on back panel)

32 Keebler TownHouse Crackers  
3 1-oz. slices of monterey jack cheese  
6 1-oz. slices of cheddar cheese  
4 tablespoons finely diced pepper  
4 tablespoons thinly sliced jalapeno peppers  
4 tablespoons sliced ripe olives cut in half

- Cut cheese slices into triangles
- Top each cracker with cheeses, peppers and olives; broil until cheese begins to melt.

Makes 32 appetizers

Prep time: 15 minutes Cooking time: 2 minutes

Wrapped in four plastic sleeves

Seals in oven freshness

Provides moisture protection





TO OPEN • SLIDE FINGER UNDER FLAP AND L

Made With 100% Vegetable Shortening



**RITZ**  
CRACKERS

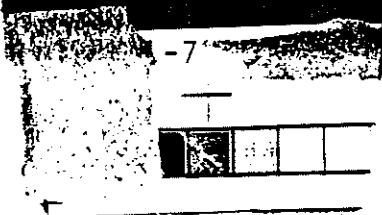


**RITZ**  
CRACKERS

This package is sold by weight, not by volume. Packed as full as practicable by modern automatic equipment, it contains full net weight indicated. If it does not appear full when opened, it is because contents have settled during shipping and handling.

NET WT 8 OZ 227 grams

No Cholesterol  
LOW SATURATED FAT



# RITZ...

- Made with 100% Vegetable Shortening
- No Cholesterol
- Low Saturated Fat
- Low Sodium

NUTRITION INFORMATION PER SERVING	
SERVING SIZE	1/2 OUNCE (4 CRACKERS)
SERVINGS PER PACKAGE	16
CALORIES	70
PROTEIN	1 GRAM
CARBOHYDRATE	9 GRAMS
FAT	4 GRAMS
POLYUNSATURATED	*
SATURATED	*
CHOLESTEROL	0 MILLIGRAMS
SODIUM	120 MILLIGRAMS
*CONTAINS LESS THAN 1 GRAM	
PERCENTAGE OF U.S. RECOMMENDED DAILY ALLOWANCES (U.S. RDA)	
PROTEIN	2
VITAMIN A	2
VITAMIN C	2
THIAMINE	2
RIBOFLAVIN	2
NIACIN	2
CALCIUM	2
IRON	2
**CONTAINS LESS THAN 2% OF THE U.S. RDA OF THESE NUTRIENTS.	
INGREDIENTS: ENRICHED WHEAT FLOUR (CONTAINS NIACIN, REDUCED IRON, THIAMINE MONONITRATE [VITAMIN B1], RIBOFLAVIN [VITAMIN B2]), VEGETABLE SHORTENING (PAR- TIALLY HYDROGENATED SOYBEAN OIL), SUGAR, HIGH FRUCTOSE CORN SYRUP, SALT, LEAVENING (BAKING SODA AND CALCIUM PHOSPHATE), MALTED BARLEY FLOUR, AND SOY LECITHIN (EMULSIFIER).	

**NABISCO  
FOODS**

East Hanover, NJ 07936  
Made in U.S.A. - Reg. Penna. Dept. Agr.  
Local Bakeries... Coast to Coast  
© 1992 NABISCO, INC.

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EASY-TAB tag, or call 1-800-932-7800,  
weekdays: 9:00 AM-7:30 PM, EST.

PRICE

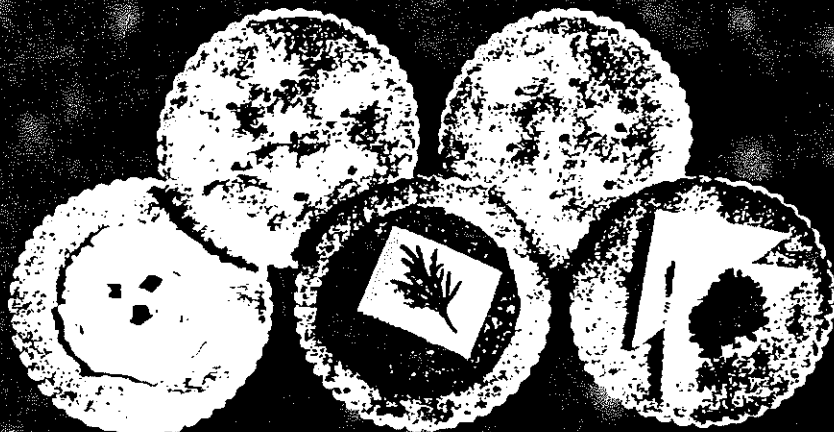
CRACKERS  
**RITZ**

NABISCO

## The buttery taste of RITZ... always delicious and crisp!

No other cracker gives you the baked-in buttery flavor of RITZ. Light and delicious, RITZ sets the standard for great taste. Try RITZ Crackers straight out of the box, or with any topping or dip you can imagine!

Any way you like them,  
RITZ means snacking satisfaction.

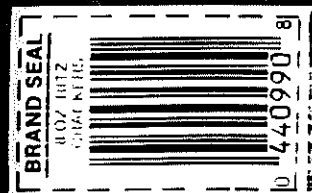


Whether you're getting together with family or friends, or simply snacking at home...

## When you want a cracker, you want a RITZ!

PRICE

CRACKERS  
**RITZ**





PRICE

EXHIBIT

HONEY

# TEDDY GRAHAMS

GRAHAM SNACKS



NET WT. 10 OZ. 283 g.

No Cholesterol  
LOW SATURATED FAT

TEDDY GRAHAMS are a delicious yet wholesome snack, great for the whole family because they're made with graham flour and other wholesome ingredients.

TEDDY GRAHAMS...

- No Cholesterol
- Low Saturated Fat
- Low Sodium

**NUTRITION INFORMATION PER SERVING**

SERVING SIZE	1/2 OUNCE (11 PIECES)
SERVINGS PER CONTAINER	20
CALORIES	60
PROTEIN	1 GRAM
CARBOHYDRATE	11 GRAMS
FAT	2 GRAMS
POLYUNSATURATED	*
SATURATED	*
CHOLESTEROL	0 MILLIGRAMS
SODIUM	90 MILLIGRAMS
*CONTAINS LESS THAN 1 GRAM	

**PERCENTAGE OF U.S. RECOMMENDED DAILY ALLOWANCES (U.S. RDA)**

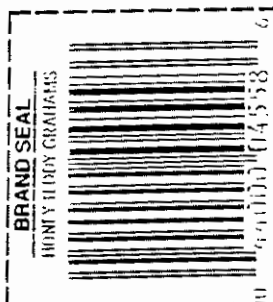
PROTEIN	**	RIBOFLAVIN	2
VITAMIN A	**	NIACIN	2
VITAMIN C	**	CALCIUM	**
THIAMINE	2	IRON	2
**CONTAINS LESS THAN 2% OF THE U.S. RDA OF THESE NUTRIENTS.			

**INGREDIENTS:** ENRICHED WHEAT FLOUR (CONTAINS NIACIN, REDUCED IRON, THIAMINE MONONITRATE [VITAMIN B<sub>1</sub>], RIBOFLAVIN [VITAMIN B<sub>2</sub>], SUGAR, VEGETABLE SHORTENING (PARTIALLY HYDROGENATED SOYBEAN OIL), HONEY, GRAHAM FLOUR, BAKING SODA, SALT, MALTO-DEXTRIN, AND SOY LECITHIN.

NABISCO  
FOODS

EAST HANOVER, NJ 07936 • MADE IN U.S.A.  
REG. PENNA. DEPT. AGR.  
LOCAL BAKERIES... COAST TO COAST  
© NABISCO FOODS, INC.  
PATENT PENDING

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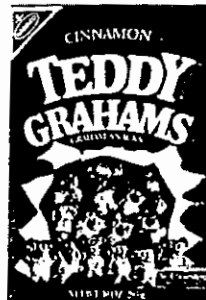
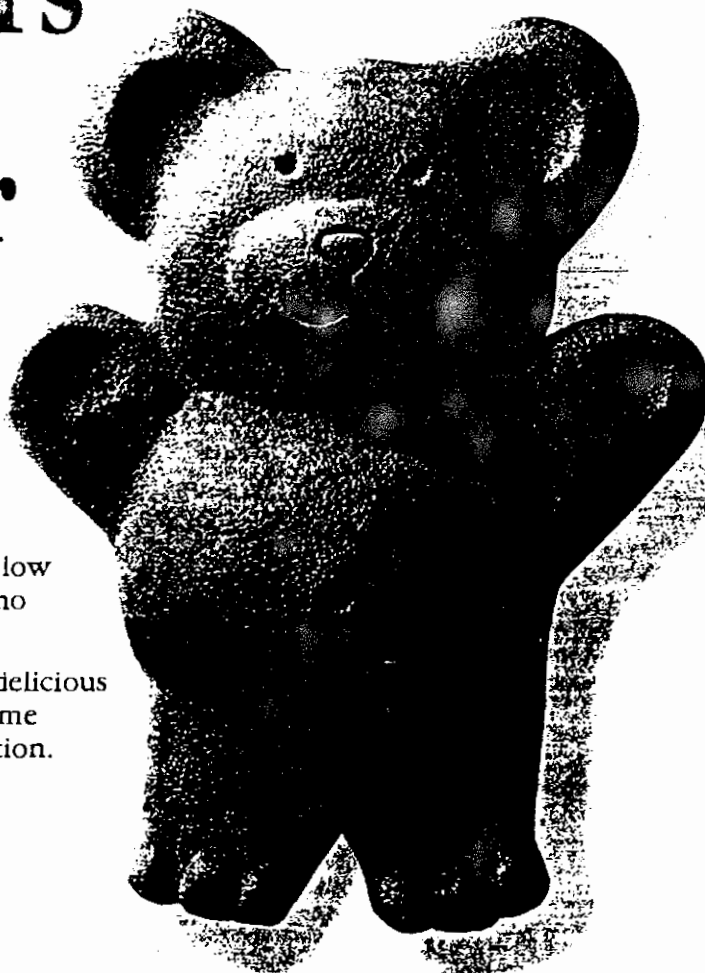
CARTON MADE FROM 100% RECYCLED PAPERBOARD  
MINIMUM 25% POST-CONSUMER CONTENT

TO OPEN • SLIDE FINGER UNDER FLAP AND LOOSEN GENTLY

# Mother's Little Helper

Sometimes you need a little help finding wholesome snacks kids will love. That's why you can feel good about Teddy Grahams. They're not too sweet and they're low in saturated fat, with no cholesterol.

Teddy Grahams. The delicious way to bring wholesome snacks out of hibernation.



FOUR DELICIOUS FLAVORS



TEDDY GRAHAMS comes in THREE other delicious flavors. Try:



CHOCOLATE



CINNAMON



VANILLA

This package is sold by weight, not by volume. Packed as full as practicable by modern automatic equipment, it contains full net weight indicated. If it does not appear full when opened, it is because contents have settled during shipping and handling.

C51 882-R3  
917P

8



DEPARTMENT OF HEALTH & HUMAN SERVICES

EXHIBIT

Telephone (201)  
April 1, 1992

Food & Drug Administration  
61 Main Street  
West Orange, NJ 07093

WARNING LETTER

R E L E A S E

Mr. Arthur G. Murray, President  
Sunshine Biscuits, Inc.  
100 Woodbridge Center Drive  
Woodbridge, NJ 07095-1196

Reviewed by JHL 7/2/92  
CO. OTE

File No. 92-NWK-42

Dear Mr. Murray:

The Food and Drug Administration (FDA) as a result of a consumer complaint, collected a sample of "Sunshine<sup>®</sup> HiHo<sup>®</sup> Deluxe WHOLE WHEAT Crackers" and "Sunshine<sup>®</sup> Krispy<sup>®</sup> WHOLE WHEAT Saltine Crackers" for label review. The review is now completed with results as follows.

The product, Sunshine<sup>®</sup> HiHo<sup>®</sup> Deluxe WHOLE WHEAT Crackers, was found to be misbranded with the meaning of the Federal Food, Drug, and Cosmetic Act, Section 403(a)(1), since its labeling prominently emphasizes on the principal display panel, the minor ingredient of whole wheat flour [21 CFR 101.18(b)]. Whole wheat flour is listed in the list of ingredients as the third most predominant ingredient, after enriched wheat flour and vegetable shortening. Further, the product contains artificial color, annatto and turmeric, which makes the product appear to have more whole wheat flour than it actually does.

The product, Sunshine<sup>®</sup> Krispy<sup>®</sup> Whole Wheat Saltine Crackers, is also misbranded since it too emphasizes the ingredient whole wheat flour on the principal display panel and whole wheat flour is not the predominant ingredient.

HIHO DELUXE WHOLE WHEAT CRACKERS

The declaration of "annatto" is followed by the term "(vegetable color)" is misleading in that it attempts to describe the coloring ingredient as something other than "artificial" to the product.

Since the level of fat in a food has a material bearing on a "No Cholesterol" claim. The term "No Cholesterol" on this product label should be accompanied by the declaration of the number of grams of fat in a serving. Also, the claim "No Cholesterol" should be changed to "A Cholesterol Free Food."

Your label bears the term "freshly-baked." For your information, in the Federal Register dated November 27, 1991, FDA proposed that the term "freshly baked" means recently made and that a food shall

Page Two - Mr. Arthur G. Murray, President  
Sunshine Biscuits, Inc.  
Woodbridge, NJ 07095-1196

not be considered to be recently made if it is available for sale more than 24 hours after preparation.

The use of the term "One Pounder" tends to exaggerate the amount of food in the container.

SUNSHINE KRISPY WHOLE WHEAT SALTINE CRACKERS

The source of the Hydrolyzed Vegetable Protein should be declared in the ingredient statement.

Since the level of fat in a food has a material bearing on a "No Cholesterol" claim, the term "No Cholesterol" on this product label should be accompanied by the declaration of the number of grams of fat in a serving and the claim should be changed to "A Cholesterol Free Food."

You should take prompt action to correct these deviations. Failure to promptly and cease distribution of the product and to correct these deviations may result in regulatory action without further notice, such as seizure or injunction.

Please advise this office in writing, within fifteen (15) working days of receipt of this letter, of the specific steps that you have taken to correct the violation. If you decide to voluntarily cease distribution, please include the date you effected that decision. Your reply should be sent to the Food and Drug Administration, Newark District Office, 61 Main Street, West Orange, New Jersey 07052-5390, Attention: Gary G. Lloyd, Compliance Officer.

Very truly yours,

*Matthew H. Lewis*

MATTHEW H. LEWIS  
District Director  
Newark District Office

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

BJ:lal

# EXHIBIT

**Sunshine**

# KRISPY

**Four single cracker STACK-PACKS plus  
reclosable STAY-KRISP PLASTIC BAG**

# Sunshine

*Sunshine*

# KRISPY

**MADE WITH ENRICHED FLOUR  
AND WHOLE WHEAT FLOUR**

# BYE

**NO  
CHOLESTEROL**

**SALTINE CRACKERS**  
K NET WT 16 OZ. (1LB.) 454g

*Sunshine*

# KRISPY

**MADE WITH ENRICHED FLOUR  
AND WHOLE WHEAT FLOUR**  
**SALTINE CRACKERS**

NUTRITION INFORMATION		PERCENTAGE OF U.S. RECOMMENDED DAILY ALLOWANCES (U.S. RDA):	
PER SERVING			
VEGETABLE	100% PROTEIN	PROTEIN	2
	APPROX. 100%	VITAMIN A	2
100% VEGETABLE PROTEIN	50	VITAMIN C	2
CALORIES	100	THIAMINE	2
SODIUM	100	RIBOFLAVIN	2
100% PROTEIN	100	NICOTINIC	2
100	100	CHOLESTERYL	2
100% SATURATED	100	IRON	2
100% SATURATED	100		
100% CHOLESTERYL	100		

THE UNIVERSITY OF CHICAGO PRESS

**CARBOHYDRATE INFORMATION** TOTAL CARBOHYDRATE 1g  
 DIETARY FIBER 1g





*Sunshine*

# KRISPY

**MADE WITH ENRICHED FLOUR  
AND WHOLE WHEAT FLOUR**

K NET WT. 16 OZ. (1LB.) 454g **SALTINE CRACKERS**



*Sunshine*

# KRISPY

**MADE WITH ENRICHED FLOUR  
AND WHOLE WHEAT FLOUR**

K NET WT. 16 OZ. (1LB.) 454g **SALTINE CRACKERS**

**NO  
CHOLESTEROL**

**NO  
CHOLESTEROL**

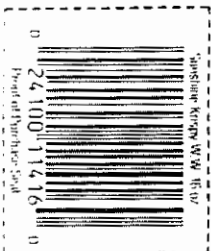


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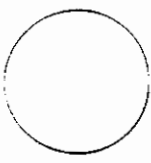
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OPEN OTHER END  
INGREDIENTS: ENRICHED WHEAT FLOUR, WHEAT FLOUR, MAIZE, REDUCED  
IRON, THIAMINE MONONITRATE, VITAMIN B1, RIBOFLAVIN, VITAMIN B2,  
OF THE FOLLOWING PARTIALLY HYDROGENATED OILS: SOYBEAN, COTTON,  
SEED, CANOLA, TOASTED DEFAINED WHEAT GERM, SUGAR, SALT, WHEAT  
BRAIN, NON-FAT DRY MILK, LEAVENING (BAKING SODA, MONOCALCIUM  
PHOSPHATE, SODIUM ACID PYROPHOSPHATE), HYDROLYZED VEGETABLE  
PROTEIN.  
Sunshine Biscuits, INC. WOODBRIDGE, NJ 07095-1195  
MADE IN U.S.A.  
PLEASE DIRECT ANY COMMENTS TO OUR CONSUMER RELATIONS  
DEPARTMENT. INCLUDE THE PROOF OF PURCHASE SEAL AND STAMPED  
ON CODE



CAUTION: MADE FROM  
100% RECYCLED PAPER





EXHIBIT

CARTON MADE FROM  
100% RECYCLED PAPER  
(MINIMUM 35% POST-CONSUMER CONTENT)

**HiHo** *Deluxe* CRACKERS  
MADE WITH ENRICHED FLOUR & WHOLE WHEAT FLOUR



*Sunshine*

**NO  
CHOLESTEROL  
LOW SODIUM**

*Sunshine*

**HiHo**  
*Deluxe*

**HiHo**  
*Deluxe*

CRACKERS MADE  
ENRICHED FLOUR  
WHOLE WHEAT FLOUR

NUTRITION INFORMATION PER  
SERVING SIZE: 4 CRACKERS  
(APPROX. 1/4 OZ.)  
SERVINGS PER CONTAINER  
CALORIES .....  
PROTEIN .....  
CARBOHYDRATES .....  
FAT .....  
POLYUNSATURATED .....  
SATURATED .....  
CHOLESTEROL .....  
SODIUM .....  
PERCENTAGE OF U.S. RECOMMENDED  
DAILY ALLOWANCES (U.S.A.)

PROTEIN .....  
VITAMIN A .....  
VITAMIN C .....  
THIAMINE .....  
RIBOFLAVIN .....  
NIACIN .....  
CALCIUM .....  
IRON .....

\*CONTAINS LESS THAN 1 GR.  
\*\*CONTAINS LESS THAN 2%  
U.S. RDA OF THESE NUTRIENTS

INGREDIENTS: ENRICHED  
FLOUR (WHEAT FLOUR,  
REDUCED IRON, THIAMINE  
MONONITRATE (VITAMIN B1), RIBOFLAVIN  
(VITAMIN B2), VEGETABLE SODIUM  
OIL (CONTAINS ONE OR MORE OF THE  
FOLLOWING PARTIALLY HYDROGENATED  
OILS: SOYBEAN, COTTONSEED, CANOLA),  
WHOLE WHEAT FLOUR, TOASTED DEFAATTED  
WHEAT, SUGAR, HIGH FRUCTOSE SYRUP,  
SALT, WHEAT BRAN, BAKING SODA, MONO-  
PHOSPHATE, SODIUM ACID PHOSPHATE,  
ANNATTO EXTRACT, TURMERIC, LECITHIN,  
COLOR, AND ARTIFICIAL FLAVORS

*Sunshine Biscuits*  
MOORESBURG, N.J. 07092  
REG. PENNA. DEPT. AGR. 11A  
PLEASE DIRECT ANY COMMERCIAL  
CONSUMER RELATIONS INQUIRY TO  
MENT. INCLUDE THE PROOF  
CHASE SEAL AND STAMPED

**NO  
CHOLESTEROL  
LOW SODIUM**

**4 CONVENIENT PACKS**

NET WT. 16 OZ. (454g)

*Sunshine*  
**HiHo** *Deluxe* CRACKERS  
MADE WITH ENRICHED FLOUR & WHOLE WHEAT FLOUR



C3712

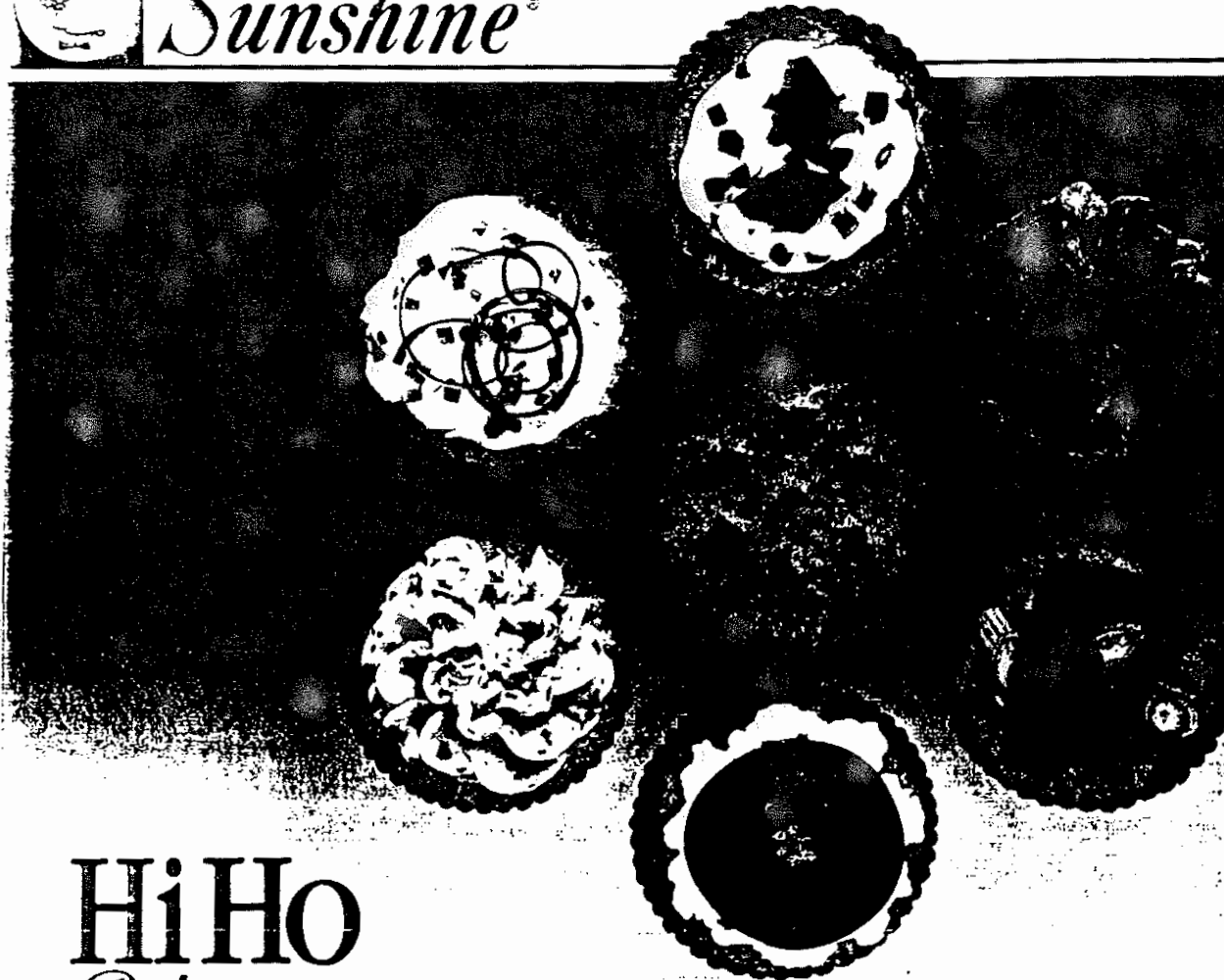
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Sunshine

STD 621



Sunshine®

Sunsh



Hi Ho

*Deluxe*

CRACKERS MADE WITH ENRICHED FLOUR & WHOLE WHEAT FLOUR—  
the goodness of Hi Ho crackers makes everything taste better

Hi Ho Deluxe Crackers are made from a unique blend of the finest quality ingredients that give these crackers a distinct, light and crispy taste. And, because Hi Ho Deluxe Crackers are baked with 100% vegetable shortening, they're chole-

sterol-free. Enjoy them with low calorie dips or spreads, plain, or right out of the box. You'll find many ways to enjoy the savory taste of Hi Ho Deluxe Crackers. We take pride in what we bake and have since 1902.

Hi Ho

*Deluxe*

CRACKERS MADE WITH ENRICHED FLOUR & WHOLE WHEAT FLOUR

What makes Sunshine cookies and crackers so special?

We think it is the care we take...the quality ingredients we use...and the high standards we uphold for consistency.

Sunshine packs Hi Ho Deluxe Crackers in individual stack packs to help keep their crispy flavor and prevent breakage.



321545  
12316F



DISTINCTIVE

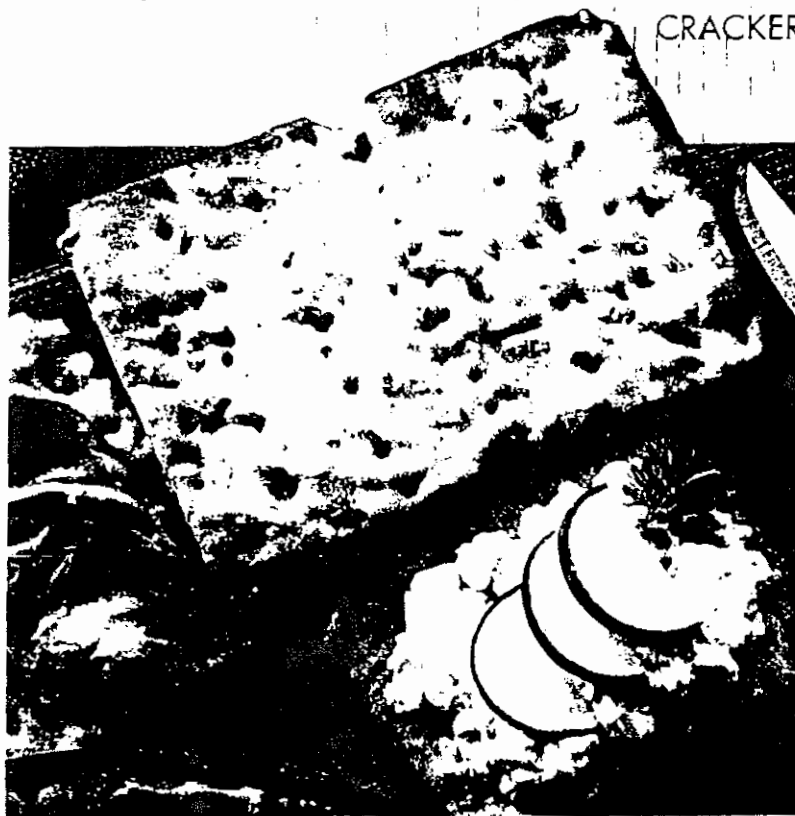
**PEPPERIDGE FARM**

# Cracked Wheat CRACKERS



DISTINCTIVE

# Cracked Wheat CRACKERS



SERVING SUGGESTIONS

NET WT. 11 OZ. (312g)

**PEPPERIDGE FARM**

DISTINCTIVE

# Cracked Wheat CRACKERS

PROOF OF PURCHASE



CRACKED WHEAT CRACKERS

If you have any questions or comments about this product,

**EXHIBIT**

**PEPPERIDGE FARM**

DISTINCTIVE

# Cracked Wheat CRACKERS

PEPPERIDGE FARM DISTINCTIVE CRACKERS  
CONTAIN NO ARTIFICIAL COLORS,  
FLAVORS, OR PRESERVATIVES.

NO TROPICAL OILS  
TOTAL DIETARY FIBER 1 GRAM  
MONOUNSATURATED FAT 2 GRAMS

## NUTRITION INFORMATION PER SERVING

SERVING SIZE	3 CRACKERS
SERVINGS PER CONTAINER	15
CALORIES	100
PROTEIN	2 GRAMS
CARBOHYDRATE	14 GRAMS
FAT	4 GRAMS
POLYUNSATURATED	0 GRAMS
SATURATED	1 GRAM
CHOLESTEROL	0 mg
SODIUM	180 mg

## PERCENTAGE OF U.S. RECOMMENDED DAILY ALLOWANCES (U.S. RDA)

PROTEIN	4	RIBOFLAVIN	1
VITAMIN A	1	NIACIN	1
VITAMIN C	1	CALCIUM	1
THIAMINE	1	IRON	1

\*CONTAINS LESS THAN 2% OF THE U.S. RDA  
OF THESE NUTRIENTS

MADE FROM UNBLEACHED ENRICHED WHEAT  
FLOUR (FLOUR, NIACIN, REDUCED IRON, THI-  
AMINE MONONITRATE (VITAMIN B1), RIBOFLA-  
VIN (VITAMIN B2), PARTIALLY HYDROGENATED  
VEGETABLE SHORTENING (CANOLA, COTTON-  
SEED AND/OR SOYBEAN OILS), CRACKED  
WHEAT, NONFAT MILK, SALT, YEAST, BARLEY  
MALT AND BAKING SODA

PEPPERIDGE FARM, INC.  
GEN. OFF. NORWALK, CT 06856  
REG. PENNA. DEPT. AGR.

1-888-123-9-10

TO CLOSE  
INSERT TAB HERE

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53533  
9/92

PEPPERIDGE FARM DISTINCTIVE CRACKERS CONTAIN NO ARTIFICIAL  
COLORS, FLAVORS, OR PRESERVATIVES.

♻️ CARTON MADE FROM 100% RECYCLED  
PAPER/BOARD MINIMUM 35% POST-CONSUMER CONTENT

## DISTINCTIVE Cracked Wheat CRACKERS

Pepperidge Farm Distinctive Crackers are perfect for every occasion! Crisp and delicious, these crackers taste great with all of your favorite dips and cheeses. Our Distinctive Crackers are so tasty, you can even enjoy them right out of the box!



Enjoy the robust flavor of our Cracked Wheat variety crackers. They're baked just a bit larger than our other crackers to satisfy even the heartiest craving. Serve them whole with your favorite topping or snap some in half for dips. You'll love the crunchy texture of Cracked Wheat!

For a free booklet filled with Distinctive Cracker serving suggestions, send a stamped, self-addressed envelope to:

Entertaining with Hors D'oeuvres  
Consumer Services  
Pepperidge Farm, Inc.  
595 Westport Avenue  
Norwalk, CT 06856

Allow eight weeks for handling. Offer good while supplies last. Limit 1 free booklet per address. Void where taxed, restricted or prohibited by law.

SERVING  
SUGGESTIONS



## DISTINCTIVE Cracked Wheat CRACKERS

These crackers  
are nestled  
in two  
individual trays,  
each wrapped  
to help  
ensure freshness.

# Sun Chips

MULTIGRAIN SNACKS

ORIGINAL  
FLAVOR



NET WT. 6½ OZ. (184.2g)



# Sunchips

## Multigrain For A Unique New Taste

**SUNCHIPS**® brand Multigrain Snacks are made from a special blend of whole wheat, corn and other natural grains, cooked until lightly crisp and crunchy. Combined, these wholesome grains make a delicious chip with the golden goodness of corn and the nut-like flavor of wheat.

**SUNCHIPS**® brand Multigrain Snacks are a unique combination of great taste, great crunch and hearty grains rolled into one remarkable chip.

So, try **SUNCHIPS**® brand Multigrain Snacks for a unique new taste sensation.



**SUNCHIPS**® brand Original Flavored Multigrain Snacks add fun and variety to a well-balanced diet. While our products are not meant to be a basic source of nutrients, they can be enjoyed as part of a healthy diet. For example, a one-ounce serving contains:

- Eight widely recognized nutrients • Only vegetable oils • About 1/20 teaspoon of salt • Only 150 calories

For more detailed information, please look closely at our nutrition label. It tells you what you want to know about fun things to eat from Frito-Lay.

Frito-Lay guarantees, until date shown on the front of the package, fresh product when this package is first opened or the purchase price plus postage, if any, will be refunded.

If you have questions, comments or are not satisfied, call toll-free 1-800-352-4477 weekdays 9 to 4:30 Central Time with product name, size, and the date, price and numbers found below the price from the front of this package.

If writing, please clip from the front of this package the date, price and numbers found below the price and send with product name, size and reason for dissatisfaction to: Guaranteed Fresh, P.O. Box 35589, Dept. 109, Dallas, TX 75235-0089.

Serving Size 1 Ounce

Number of Servings 6 1/2

Calories .....	150
Protein .....	2 g
Carbohydrate .....	18 g
Fat .....	8 g
Cholesterolf ..... (0 mg/100 g) .....	0 mg
Sodium .....	100 mg
Potassium .....	45 mg

Protein .....	2
Vitamin A .....	•
Vitamin C .....	•
Thiamine .....	2
Riboflavin .....	8
Niacin .....	2
Calcium .....	•
Iron .....	•

Information on fat and/or cholesterol content is provided for individuals who, on the advice of a physician, are modifying their total dietary intake of fat and/or cholesterol.

\*Contains less than 2% U.S. RDA for this nutrient.

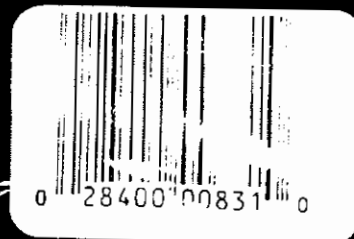
Ingredients: Corn, Vegetable Oil [Contains Partially Hydrogenated (Canola and/or Sunflower) Oil], Whole Wheat, Rice Flour, Oat Flour, Sugar and Salt.

No Preservatives.

Frito-Lay, Inc.  
Dallas, Texas 75235-5224

©Recot, Inc., 1989

Reg. Anna. Dept. Agr.



SUNC-2284A





# Light Style

## WHEAT

**FAT  
FREE**  
40 CALORIES  
PER SLICE



**No Trans Fat • No Cholesterol • No Fat • Low Sodium**

TOTAL DIETARY FIBER 2 GRAMS • MONOSATURATED FAT 0 GRAMS

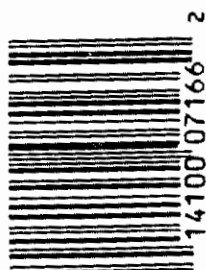
NUTRITION INFORMATION PER SERVING			
SERVING SIZE	1 SLICE	FAT	0 GRAMS
SERVINGS PER CONTAINER	23	POLYUNSATURATED	0 GRAMS
CALORIES	40	SATURATED	0 GRAMS
PROTEIN	2 GRAMS	CHOLESTEROL	0 mg
CARBOHYDRATE	9 GRAMS	SODIUM	90 mg
PERCENTAGE OF U.S. RECOMMENDED DAILY ALLOWANCES (U.S. RDA)			
PROTEIN	4	RIBOFLAVIN	2
VITAMIN A	•	NIACIN	4
VITAMIN C	•	CALCIUM	2
THIAMINE	6	IRON	4

\*CONTAINS LESS THAN 2% OF THE U.S. RDA OF THESE NUTRIENTS.

MADE FROM: UNBROMINATED UNBLEACHED ENRICHED WHEAT FLOUR (FLOUR, NIACIN, REDUCED IRON, THIAMINE MONONITRATE (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), WATER, UNBROMINATED STON- GROUND 100% WHOLE WHEAT FLOUR, CORN SYRUP, WHEAT MILK, WHEAT BRAN, YEAST, WHEAT GLUTEN, SOY FIBER, HONEY, SPENT WHEAT (WHEAT BRAN, WHEAT PROTEIN, MALTODEXTRIN), SALT, UNSULFURED MOLASSES, POTATO FLOUR, MONO AND DIGLYCERIDES (FROM HYDROGENATED VEGETABLE OIL), CALCIUM PROPIONATE TO RETARD SPOILAGE, DEGERMINATED WHITE CORN FLOUR, XANTHAN GUM, SOY FLOUR AND SOY LECITHIN.

PEPPERIDGE FARM, INC. • GEN. OFF. • NORWALK, CT 06855  
REG. MINN. DEPT. AGR.

71'-5-6-3



PROOF OF PURCHASE  
WHEAT

If you have any questions or comments about this product, please include the plastic closure tag along with the proof of purchase panel.

—Thank You

watching calories. So Pepperidge Farm decided to bake up Light Style breads. These breads have all the home-baked taste you've come to expect from Pepperidge Farm. They're fresh-tasting and bursting with moist, rich flavor. And each full size slice has only 40 calories. But that's not all. Each slice is fat free! Available in Vienna, Wheat, Oatmeal, and 7 Grain varieties.

Our Light Style breads live up to their Pepperidge Farm heritage. Pepperidge Farm breads... breads with character.



**Lite**  
REDUCED CALORIE WHEAT BREAD



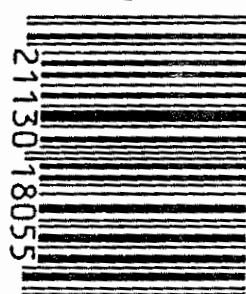
NET WT 16 OZ  
(1 LB) 453g

**33 1/3% LESS CALORIES**  
THAN REGULAR WHEAT

**30% LESS CARBOHYDRATES**  
THAN REGULAR WHEAT



Finest Quality



4

0

EXHIBIT

SELL THRU JUN2



**Life**  
REDUCED CALORIE WHEAT BREAD



**SERVING SIZE: 1 SLICE (APPROX. 23 g)**  
**SERVINGS PER CONTAINER: 18**

**SERVING SIZE: 1 SLICE (APR 23 g)**  
**SERVINGS PER CONTAINER: 18**

SERVINGS PER CONTAINER: 18

## PER SERVING

CALORIES.....	40
PROTEIN.....	2 GRAMS
CARBOHYDRATE.....	8 GRAMS
FAT CONTENT.....	0 GRAM
CHOLESTEROL.....	0 MILLIGRAMS
*CHOLESTEROL PER 100 GRAMS..	0 MILLIGRAMS
SODIUM.....	140 MILLIGRAMS

INFORMATION ON CHOLESTEROL CONTENT IS PROVIDED FOR INDIVIDUALS WHO, ON THE ADVICE OF A PHYSICIAN, ARE MODIFYING THEIR DIETARY INTAKE OF CHOLESTEROL.

PERCENTAGE OF U.S. RECOMMENDED  
DAILY ALLOWANCES (U.S. RDA):

## PER SERVING

PROTEIN.....2%	RIBOFLAVIN.....2%
**VITAMIN A.....	NIACIN.....2%
**VITAMIN C.....	CALCIUM.....2%
THIAMINE.....4%	IRON.....2%

\*\*CONTAINS LESS THAN 2% OF THE U.S. RDA OF THESE NUTRIENTS.

INGREDIENTS: ENRICHED FLOUR (WHEAT FLOUR, MALTED BARLEY FLOUR, IRON (FERRIC) SULFATE), NIACIN, THIAMINE MONONITRATE, RIBOFLAVIN, WATER, CORN BRAN, HIGH FRUCTOSE CORN SYRUP, WHEAT GLUTEN, WHOLE WHEAT FLOUR, WHEAT BRAN. CONTAINS 2 PERCENT OR LESS OF EACH OF THE FOLLOWING: MOLASSES, YEAST, CANDLA OIL AND/OR SOYBEAN OIL, SALT, SOYA FLOUR, GUAR GUM, CALCIUM SULFATE, DOUGH CONDITIONERS (MAY CONTAIN ONE OR MORE OF THE FOLLOWING: CALCIUM AND SODIUM STEAROYL LACTYLATE, ETHOXYLATED MONO- AND DIGLYCERIDES, MONO-CALCIUM PHOSPHATE, CALCIUM CARBONATE, DICALCIUM PHOSPHATE), MONO- AND DIGLYCERIDES, YEAST NUTRIENTS (DIAMMONIUM PHOSPHATE AND/OR AMMONIUM SULFATE), CALCIUM PROPIONATE (ADDED TO RETARD SPOILAGE).

REG. PENNA. DEPT. AGR. - L

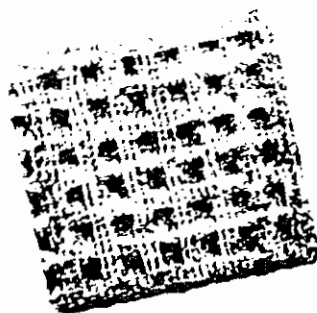
REG. PENNA. DEPT. AGR. - L

DISTRIBUTED BY © SAFEWAY INC., OAKLAND, CA 94660 U.S.A.

TO OPEN - SLIDE FINGER UNDER FLAP AND LOOSEN



**triscuit**  
whole wheat wafers



**triscuit**  
whole wheat wafers

**MICROWAVE  
RECIPES!**  
(SEE BACK PANEL)



This package is sold by weight, not by volume. Packed as full as practicable with modern automatic equipment, it contains full net weight indicated. If it does not appear full when opened, it is because contents have settled during shipping and handling.

**No Cholesterol**  
LOW SATURATED FAT

NET WT 13 OZ 369 grams



93  
C51- -R1

ASTORIA

# triscuit

PRICE

- No Cholesterol
- Low Saturated Fat
- Low Sodium

PLATE NO	
PLATE SIZE	INCHES (3 WAFERS)
PLATES PER PLATE	10
PLATES	10
PLATE TYPE	GRAM
SOLVENT	GRAMS
SOLVENT RATE	GRAMS
SOLVENT SATURATED	GRAMS
SOLVENT GRATED	:
SOLVENT ESTEROL	MILLIGRAMS
SOLVENT	MILLIGRAMS

PERCENTAGE OF U.S. RECOMMENDED  
DAILY ALLOWANCES (U.S. RDA)

[illegible]

**INGREDIENTS:** BUTTER FLAVORED WAFFERS ARE MADE FROM A DOUGH PREPARED FROM WHOLE WHEAT FLOUR, SUGAR, BUTTER, AND HYDROGENATED VEGETABLE OIL. CONTAINS 10% BUTTER. 100% WHOLE WHEAT FLOUR. NO ARTIFICIAL FLAVORS OR COLORS.

# Microwave Triscuit. Hot'n Crunchy!



Pizza-Style  
Triscuit Wafers

MAKES 4 SERVINGS

20 TRISCUIT Wafers  
3/4 cup shredded mozzarella cheese  
1/2 cup prepared spaghetti or pizza sauce  
1/4 cup chopped pepperoni (optional)

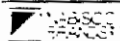
1/2 cup prepared spaghetti sauce (optional)  
1/4 cup chopped pepperoni (optional)

Arrange waters on a large microwavable plate. Top with 1/4 cup cheese, spaghetti sauce, remaining cheese and pepperoni if desired. Microwave at HIGH (100% power) for 1 minute; rotate plate 1/4 turn. Cook for 10 to 20 seconds more or until cheese melts. Serve immediately.

**ADDITIONAL DIRECTIONS:** Prepare as above on a microwaveable plate. Bake at 350°F.

CONVENTIONAL DIRECTIONS: Prepare as above on an ovenproof plate or 9-inch pie plate. Bake at 350°F for 12 to 15 minutes or until hot and cheese melts.

See other Triscuit packages for more great tasting recipe ideas!



Eastmanover, NJ 07036 • Made in U.S.A.  
Reg. Penna. Dept. Agr. • Local Bakers...  
Coast to Coast • © 1991 NABISCO, INC.  
When writing to us, please enclose the  
EAST-TAB Reg. or Pat. # 4,800-932-7600.  
Weekdays, 9:00 AM-7:00 PM EST.

# Unit

**PRICE**



TO OPEN • SLIDE FINGER UNDER  
FLAP AND LOOSEN GENTLY

CARTON MADE  
FROM 100% RECYCLED  
PAPERBOARD  
MINIMUM 35% POST CONSUMER CONTENT

EXHIBIT 9

RITZ BITS...

- No Cholesterol
- Low Saturated Fat
- Low Sodium

NUTRITION INFORMATION  
PER SERVING

SERVING SIZE	1 1/2 OUNCE (22 CRACKERS)
SERVICES PER PACKAGE	20
CALORIES	70
PROTEIN	1 GRAM
CARBOHYDRATE	9 GRAMS
FAT	4 GRAMS
POLYUNSATURATED	*
SATURATED	*
CHOLESTEROL	0 MILLIGRAMS
SODIUM	120 MILLIGRAMS
* CONTAINS LESS THAN 1 GRAM	
PERCENTAGE OF U.S. RECOMMENDED DAILY ALLOWANCES (U.S. RDA)	
PROTEIN	2 RIBOFLAVIN 2
VITAMIN A	** NIACIN 2
VITAMIN C	** CALCIUM 2
THIAMINE	4 IRON 2
* * CONTAINS LESS THAN 2% OF THE U.S. RDA OF THESE NUTRIENTS	

INGREDIENTS: ENRICHED WHEAT  
FLOUR (CONTAINS NIACIN, REDUCED  
IRON, THIAMINE MONONITRATE [VITA-  
MIN B<sub>1</sub>], RIBOFLAVIN [VITAMIN B<sub>2</sub>]),  
VEGETABLE SHORTENING (PARTIALLY  
HYDROGENATED SOYBEAN OIL),  
SUGAR, HIGH FRUCTOSE CORN SYRUP,  
SALT, LEAVENING (BAKING SODA AND  
CALCIUM PHOSPHATE), MALTED BAR-  
LEY FLOUR, AND SOY LECITHIN  
(EMULSIFIER).

This package is sold by weight, not  
by volume. Packed as full as practi-  
cable by modern automatic equip-  
ment, it contains full net weight  
indicated. If it does not appear full  
when opened, it is because contents  
have settled during shipping and  
handling.

NABISCO  
FOODS

East Hanover, NJ 07936  
Made in U.S.A.  
Reg. Penna. Dept. Agr.  
Local Bakeries...Coast to Coast  
© NABISCO FOODS, INC.

When writing to us, please  
enclose the EASY-TAB flap, or  
call 1-800-932-7800, weekdays,  
9:00 AM-7:30 PM, EST.

3493K



5

NABISCO

RITZ  
bits

Mini RITZ Crackers

Save  
up to  
**\$5.00**  
on  
**PLAYSKOOL**  
Toys

See details on back.  
Offer expires 12/31/92



No Cholesterol  
LOW SATURATED FAT

NET WT 10.0Z 283 grams

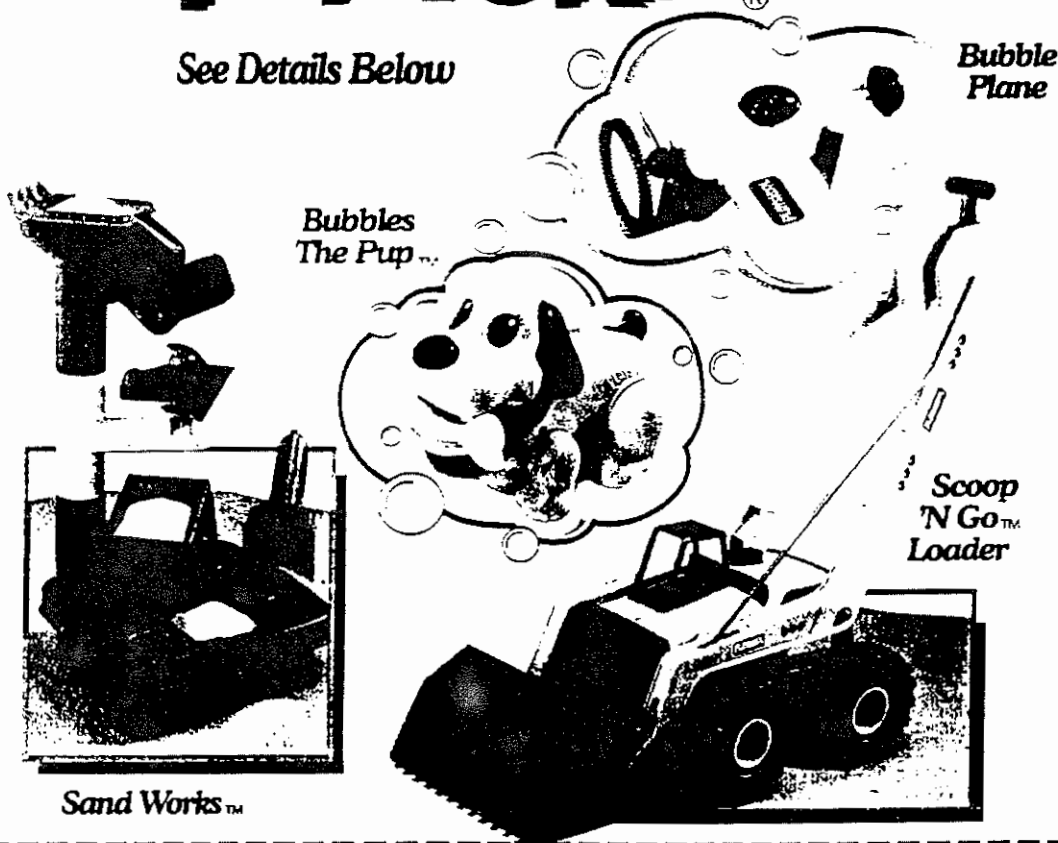
PRICE

RITZ

NABISCO

# SAVE UP TO \$5.00 ON PLAYSKOOL TOYS

See Details Below



Bubble  
Plane

Bubbles  
The Pup™

Scoop  
'N Go™  
Loader

Sand Works™

MAIL-IN CERTIFICATE | EXPIRES DECEMBER 31, 1992

## PLAYSKOOL® \$5.00 REFUND OFFER

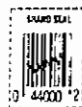
RECEIVE: Bearer's draft (refund check) up to \$5.00.

SEND: This official mail-in certificate, PLUS cash register receipt(s) (dated between 7/31/92 and 12/31/92) with Playskool toy price(s) circled AND UPC code(s) for the selected Playskool product(s).

MAIL TO: Playskool® \$5.00 Offer, CPG Promotion D662, P.O. Box 52944, Phoenix, AZ 85072-2944

Please (✓) the desired option(s):	Refund Amount
<input type="checkbox"/> 115 Scoop 'N Go™ Loader	\$1.75
<input type="checkbox"/> 1045 Sand Works™	\$1.00
<input type="checkbox"/> 1040 Bubbles The Pup™	\$1.25
<input type="checkbox"/> 1050 Bubble Plane	\$1.00
Total Refund Amount	\$

Name \_\_\_\_\_  
Address \_\_\_\_\_ Apt. # \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_



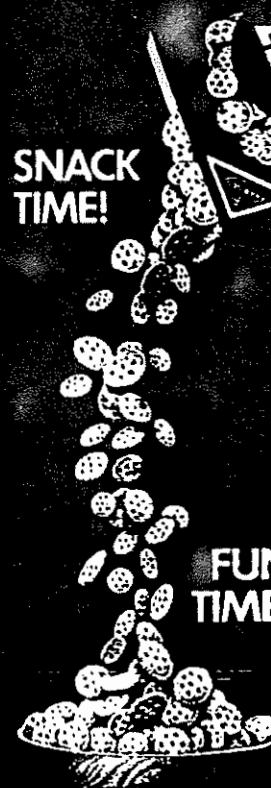
This certificate must accompany all requests. No facsimiles allowed. Offer limited to one (1) request per name, address, group or organization. Please allow 10 weeks for delivery. Good only in U.S.A., FPOs and APOs. Void where prohibited, taxed or restricted by law. Offer expires December 31, 1992. Nabisco Foods Inc. and Playskool are not responsible for postage or misdirected mail. Void where prohibited. © 1992 Nabisco Foods, Inc. © 1992 Playskool Inc.

NABISCO

# RITZ bits

Mini RITZ Cracker

SNACK  
TIME!



FUN  
TIME!

ANYTIME!

Great RITZ Taste!  
Great Snackin' Fun!

PRICE



BRAND SEAL  
100% RITZ BITS  
CRACKERS

Mini RITZ Crackers

# RITZ bits

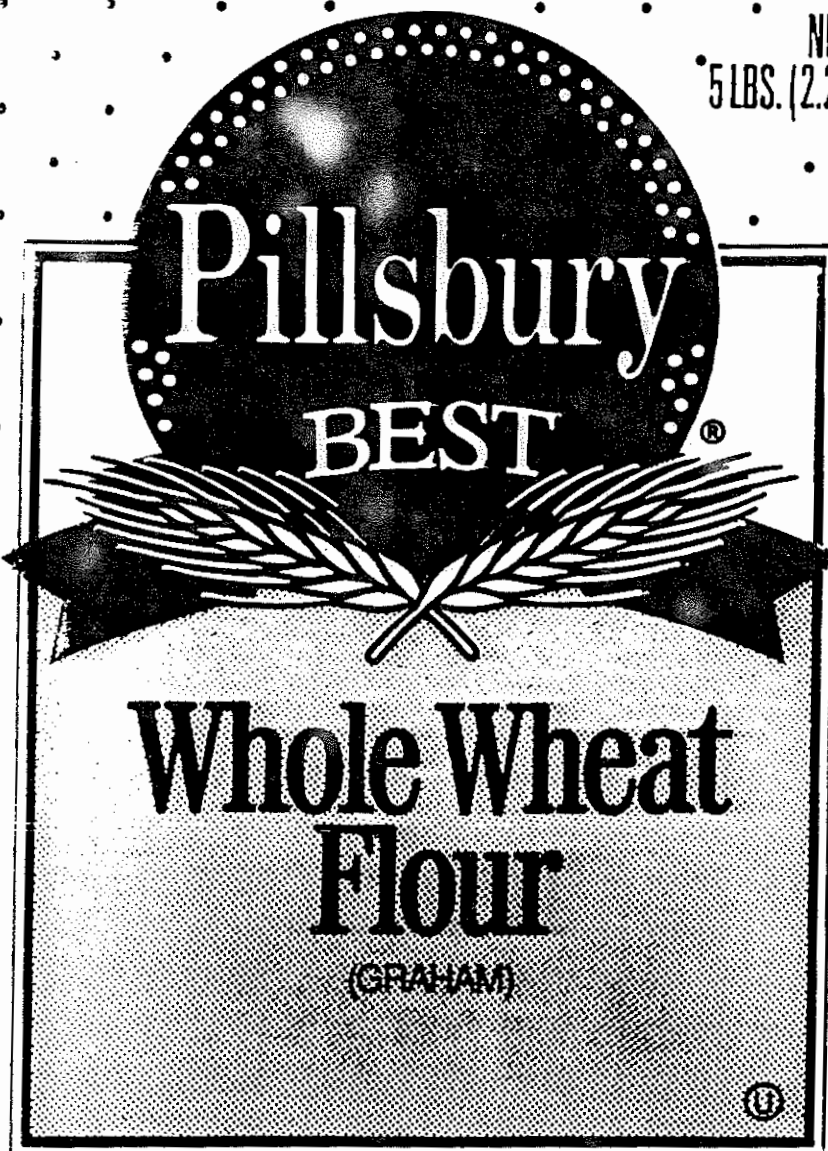
NABISCO

91C041-1V2





EXHIBIT 10



NET WT.  
5 LBS. (2.26 kg)



NUTRITION INFORMATION

PORTION SIZE: 4 OZ. (ABOUT 1 CUP)

PORTIONS PER CONTAINER: 20

CALORIES .....

PROTEIN (g) .....

CARBOHYDRATE (g) .....

FAT (g) .....

SODIUM (mg) .....

POTASSIUM (mg) .....

PERCENTAGE OF U.S. RECOMMENDED  
DAILY ALLOWANCES (U.S. RDAs)  
PER PORTION:

PROTEIN .....

VITAMIN A .....

VITAMIN C .....

THIAMINE (B<sub>1</sub>) .....

RIBOFLAVIN (B<sub>2</sub>) .....

NIACIN .....

CALCIUM .....

IRON .....

PHOSPHORUS .....

\*CONTAINS LESS THAN 2% OF THE

RDA OF THESE NUTRIENTS.

CONTAINS: WHOLE WHEAT FLOUR

EACH PORTION CONTAINS 11 GRAMS

OF DIETARY FIBER.

CONSUMER TIP

TO PRESERVE FRESHNESS, STORE

IN REFRIGERATOR OR FREEZER

THE PILLSBURY COMPANY  
2866 PILLSBURY CENTER  
MINNEAPOLIS, MN 55402-14

©1991

Pillsbury  
BEST

**BAKE-OFF**

CONTEST WINNING RECIPES

A favorite from the 1957 Bake-Off® Contest, these gooey rolls are sensational! And so easy they form their own caramel topping as they bake.

### Whole Wheat Caramel Rolls

- |                                                    |                                               |
|----------------------------------------------------|-----------------------------------------------|
| 1 to 2 cups Pillsbury's BEST®<br>All Purpose Flour | 1 cup firmly packed brown sugar               |
| 1 cup Pillsbury's BEST®<br>Whole Wheat Flour       | $\frac{1}{4}$ cup margarine or butter, melted |
| 3 tablespoons sugar                                | $\frac{1}{4}$ cup chopped nuts                |
| 1 teaspoon salt                                    |                                               |
| 1 pkg. active dry yeast                            |                                               |
| $\frac{1}{4}$ cup milk                             |                                               |
| $\frac{1}{4}$ cup water                            |                                               |
| 2 tablespoons shortening                           |                                               |



Grease 9-inch square pan. Lightly spoon flour into measuring cup; level off. In large bowl, combine  $\frac{1}{4}$  cup all purpose flour, whole wheat flour, sugar, salt and yeast; blend well. In small saucepan, heat milk, water and shortening until very warm (120 to 130°F). Add warm liquid to flour mixture. Stir by hand until dry ingredients are moistened. Stir in an additional  $\frac{1}{4}$  to  $\frac{1}{2}$  cup all purpose flour to form a stiff dough. On floured surface, knead in  $\frac{1}{4}$  to  $\frac{1}{2}$  cup all purpose flour until dough is smooth and elastic, about 5 minutes. Place dough in greased bowl; cover loosely with plastic wrap and cloth towel. Let rise in warm place (80 to 85°F) until light and doubled in size, about 1½ hours.

Punch down dough several times to remove all air bubbles. On lightly floured surface, roll dough to 16x12-inch rectangle. In small bowl, combine brown sugar and margarine; blend well. Spread evenly over dough; sprinkle with nuts. Starting with 16-inch side, roll up tightly, pressing edge to seal. Cut into 16 slices; place cut side down in greased pan. Cover; let rise in warm place until light and doubled in size, 45 to 60 minutes.

Heat oven to 350°F. Uncover dough. Bake 25 to 30 minutes or until golden brown. Cool 2 minutes; turn onto serving plate. 16 rolls.

HIGH ALTITUDE—Above 3500 Feet: Bake at 375°F. for 25 to 30 minutes.



18000-45780

Pillsbury  
BEST

### QUALITY PLEDGE

Flour is the most important ingredient in home baking. And Pillsbury strives to provide you with the highest quality flour you can buy.

If you have questions, comments or are not satisfied with the quality of this product, call toll-free 1-800-767-4466 weekdays 8-6 Central Time. (Information from the bottom of the bag may be helpful when you call.)

### Glad You Asked!

#### What is Whole Wheat Flour?

Pillsbury's BEST® Whole Wheat Flour is made from the entire wheat kernel—bran, endosperm and germ. It contains all the natural nutrients found in wheat.

#### How can I use Whole Wheat Flour?

Whole Wheat Flour has less baking strength than All Purpose Flour. Best results are obtained when equal parts of Whole Wheat and All Purpose Flour are combined in recipe.

#### What is the best way to store Whole Wheat Flour?

Store flour in an airtight container in a cool place (75°F or cooler) away from heat. It will stay fresh for 6 months. For maximum shelf life, store in refrigerator or freezer for up to 1 year.

#### How many cups per pound of flour?

There are four cups of flour in one pound.



# Graham Crackers



**Graham  
Crackers**  
*Graham Crackers With That  
Good Old Fashioned Flavor!*



**Cholesterol Free**  
**Low In Saturated Fat**



**Graham Crackers**

# Graham Crackers

*Graham Crackers With That Good Old Fashioned Flavor!*

**NUTRITION INFORMATION** (per serving)

Serving Size 4 crackers (Approx. 1.2 oz.)  
 Servings per Container 30

Calories	60
Protein	1 gram
Carbohydrate	11 grams
Fat	2 grams
Polyunsaturated	less than 1 gram
Saturated	less than 1 gram
Cholesterol	0 milligrams
Sodium	70 milligrams
Potassium	25 milligrams

**PERCENTAGE OF THE U.S. RECOMMENDED DAILY ALLOWANCES (U.S. RDA)**

Protein	2
Vitamin A	2
Vitamin C	2
Thiamine	2
Riboflavin	2
Niacin	2
Calcium	2
Iron	2

\*Contains less than 2% of the U.S. RDA of this nutrient

**INGREDIENTS:** ENRICHED WHEAT FLOUR CONTAINING NIACIN, REDUCED IRON, THIAMINE MONONITRATE (VITAMIN B<sub>1</sub>) AND RIBOFLAVIN (VITAMIN B<sub>2</sub>), SUGAR, GRAHAM FLOUR (VITAMIN B<sub>3</sub>), VEGETABLE SHORTENING (PARTIALLY HYDROGENATED SOYBEAN AND COTTONSEED OILS), MOLASSES, CORN SYRUP, LEAVENING (SODIUM BICARBONATE, SODIUM ACID PYROPHOSPHATE, MONOCALCIUM PHOSPHATE), SALT, SOY LECITHIN AND ARTIFICIAL FLAVOR.

REF. PENNA. DEPT. AGR.

MADE IN U.S.A.

Six (6) Graham Crackers = 1 Cup Crumbs

Every product from Keebler is meant to be Uncommonly Good. Should you have reason to write us regarding the product, please send your correspondence with end box flap with stamped in-code (not proof of purchase seal) to: Keebler Company Consumer Relations, 1 Hollow Tree Lane, Elmhurst, IL 60126.

Copyright © 1990

**KEEBLER COMPANY**  
 ELMHURST, ILLINOIS 60126

**Cholesterol Free**  
**Low In Saturated Fat**

# Graham Crackers



15 OZ. GRAHAM CRACKERS



PROOF OF PURCHASE

TO OPEN, LIFT FLAP  
TO RECLOSE, PRESS IN FLAP



# Honey Grahams

*Old Fashioned Graham Goodness  
Old Fashioned Good Taste!*

**Cholesterol Free**  
**Low In Saturated Fat**

NET WT. 16 OZ. (1 LB.) 453g



## Honey Grahams



# Honey Grahams

*Old Fashioned Graham Goodness  
Old Fashioned Good Taste!*

#### NUTRITION INFORMATION (per serving)

Serving Size 4 crackers (Approx. 1 1/2 oz.)	
Servings per Container	30
Calories	60
Protein	1 gram
Carbohydrate	12 grams
Fat	3 grams
Polyunsaturated	less than 1 gram
Saturated	less than 1 gram
Cholesterol	0 milligrams
Sodium	70 milligrams
Potassium	20 milligrams

Cracker	51
Calcium	2
Iron	2

\*Contains less than 2% of the U.S. RDA of this nutrient.

**INGREDIENTS:** ENRICHED WHEAT FLOUR CONTAINING NIACIN, REDUCED IRON, THIAMINE MONONITRATE (VITAMIN B1) AND RIBOFLAVIN (VITAMIN B2), VEGETABLE SHORTENING (PARTIALLY HYDROGENATED SOYBEAN AND/OR COTTONSEED OILS), SUGAR, GRAHAM FLOUR, MOLASSES, HONEY, CORN SYRUP, HIGH FRUCTOSE CORN SYRUP, LEAVENING (SODIUM BICARBONATE, SODIUM ACID PYROPHOSPHATE, MONOCALCIUM PHOSPHATE), SALT, SOY LECITHIN, ARTIFICIAL FLAVOR.

REG. PENNA. DEPT. AGR.

MADE IN U.S.A.

Six (6) Honey Grahams = 1 Cup Crumbs

Every product from Keebler is meant to be Uncommonly Good. Should you have reason to write us regarding the product, please send your comments along with end box flap with stamped-in code (not proof of purchase seal) to: Keebler Company, Consumer Relations, 1 Hollow Tree Lane, Elmhurst, IL 60126.

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KEEBLER COMPANY  
ELMHURST, ILLINOIS 60126





# Honey Grahams

*Old Fashioned Good Taste!*



## Blueberries n' Cheese Squares

- |                                             |                                                |
|---------------------------------------------|------------------------------------------------|
| 1½ packets Keebler® Honey Graham Crackers   | 2 tablespoons powdered sugar                   |
| ½ cup butter or margarine, melted           | 1 can (1 pound 5 ounces) blueberry pie filling |
| 1 package (8 ounces) cream cheese, softened | 1 cup whipping cream                           |
| ¼ cup milk                                  | 2 tablespoons powdered sugar                   |

Roll Keebler Honey Graham Crackers to fine crumbs. In 11¼ x 7½-inch baking dish, combine crumbs and butter or margarine, mixing well. Reserve ½ cup crumb mixture for topping. Press remaining crumbs in bottom of dish. Chill while preparing cream cheese. Blend cream cheese, sugar, and milk until smooth. Spread evenly over crumb layer. Spread pie filling over cheese and chill while preparing cream. Using chilled beaters and bowl, whip cream and sugar until stiff. Spread evenly over blueberries. Sprinkle with reserved crumbs. Refrigerate until ready to serve.

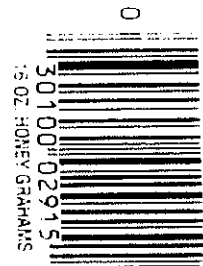


# Honey Grahams

*Old Fashioned Graham Goodness  
Old Fashioned Good Taste!*



Honey Grahams



*Old Fashioned Graham Goodness  
Old Fashioned Good Taste!*

**Cholesterol Free!**  
**Low In Saturated Fat**

NET WT 16 OZ (1 LB) 452g





# Honey Maid

HONEY GRAHAMS

PRICE

EXHIBIT



# Honey Maid

HONEY GRAHAMS

**Honey Maid**  
HONEY GRAHAMS...

- No Cholesterol
- Low Fat
- Low Sodium

**NUTRITION INFORMATION PER SERVING**  
SERVING SIZE 1/2 OZ (APPROX. 2 CRACKERS)  
SERVINGS PER PACKAGE 16  
CALORIES 110  
PROTEIN 1 G  
CARBOHYDRATE 11 GR  
FAT 1 G  
POLYUNSATURATED 0.5 G  
SATURATED 0.5 G  
CHOLESTEROL 0 MLLIG  
SODIUM 95 MLLIG  
\* CONTAINS LESS THAN 1 GRAM

**PERCENTAGE OF U.S. RECOMMENDED DA**  
**ALLOWANCES (U.S. RDA)**

PROTEIN	22	RIBOFLAVIN	22
VITAMIN A	22	NIACIN	22
VITAMIN C	22	CALCIUM	22
THIAMINE	2	IRON	2

\* \* CONTAINS LESS THAN 2% OF THE U.S. RDA OF THESE NUTRIENTS

**INGREDIENTS:** ENRICHED WHEAT FLOUR (CONTAINING NIACIN, REDUCED IRON, THIAMINE MONONITRATE (VITAMIN B1), RIBOFLAVIN (VITAMIN B2)), SUGAR, VEGETABLE SHORTENING (PARTIALLY HYDROGENATED SOYBEAN OIL), GRAHAM FLOUR, HONEY, FRUCTOSE CORN SYRUP, LEAVENING (BAKING SODA, CALCIUM PHOSPHATE), SALT AND NATURAL ARTIFICIAL FLAVOR.

**NABISCO**  
**FOODS**

East Hanover, NJ 07936  
Made in U.S.A.  
Reg. Penna. Dept. Agr.  
Local Bakeries... Coast to Coast  
© 1992 NABISCO FOODS, INC.  
When writing to us, please enclose the EASY-TAB flap, or call 1-800-932-7800, weekdays, 9:00 AM - 7:30 PM, EST.

**No Cholesterol**  
LOW FAT

NET WT 16 OZ (1 LB) 454 grams

**BRAND SEAL**

16 OZ. HONEY MAID  
HONEY GRAHAMS



# Honey Maid

HONEY GRAHAMS

PRICE



6



CARTON MADE  
FROM 100% RECYCLED  
PAPERBOARD  
MINIMUM 35% POST-CONSUMER CONTENT

TO OPEN • SLIDE FINGER UNDER FLAP AND LOOSEN GENTLY

# Enjoy Real Graham Goodness!

in two great tastes...  
Honey and Cinnamon!

Real Graham goodness means wholesome wheat and pure honey—nature's finest ingredients baked into every graham. And now you can choose from two popular flavors, Honey and Cinnamon Grahams. You'll find a taste to satisfy everyone in your family.



Two  
varieties!



# Honey Maid

HONEY  
GRAHAMS

Real Graham  
Goodness  
in every  
delicious bite!

C51-5 REV.