

Stamp Usage Guide for the Whole Grain Stamp in the United States (except FSIS)

This Stamp Usage Guide outlines rules that <u>must be followed by all companies</u> using the Whole Grain Stamp. Your cooperation in observing these rules ensures that together we will:

- provide clear and useful communication to consumers
- · help consumers find and enjoy high-quality whole grain products
- support the Whole Grain Stamp as a consistent and trustworthy symbol

As stated in the Whole Grain Stamp Agreement Form signed by all companies before using the Stamp, failure to comply with these rules may result in termination of your membership in the Whole Grains Council and loss of further rights to use the Whole Grain Stamp.

→ Determining Which Products Qualify to use the Stamp

Note: Contact us if your product *contains meat and poultry products* as such packaging *must be approved by USDA/FSIS*. FSIS products can use the Whole Grain Stamp, but with slight modifications. There is a separate Stamp Usage Guide for FSIS products.

FIRST: Compute the Amount of Whole Grain Ingredients per serving.

A. Which ingredients qualify as whole grains?

"Whole grains" are any ingredients included in the Whole Grains Council's definition of whole grains, located on our website at <u>http://www.wholegrainscouncil.org/whole-grains-101/definition-of-whole-grains</u> and reproduced here:

Whole grains or foods made from them contain all the essential parts and naturally-occurring nutrients of the entire grain seed. If the grain has been processed (e.g., cracked, crushed, rolled, extruded, and/or cooked), the food product should deliver approximately the same rich balance of nutrients that are found in the original grain seed. This definition means that 100% of the original kernel – **all of the bran, germ, and endosperm** – must be present to qualify as a whole grain ingredient.

The following, **when consumed with all their bran, germ and endosperm,** are examples of generally accepted whole grain foods and flours:

Amaranth	Barley	
Buckwheat	Corn/Maize (including Popcorn and Whole Cornmeal)	
Emmer	Farro	
Kamut® grain	Millet	
Oatmeal and Whole Oats	Quinoa	
Brown and Colored Rice	Rye	
Sorghum	Spelt	
Teff	Triticale	
Wheat (including cracked wheat, bulgur, wheat berries, durum wheat)		

Wild Rice

Other cereal grains in the Pocaceae (also called Gramineous) family may be considered whole grains when all their bran, germ and endosperm are present.

Sprouted (malted) grains count, when they are whole, but may need to be computed differently, as detailed below.

B. How do members measure whole grain content?

Determining whole grain content is relatively straightforward. Ingredients (flour, grains) are measured in their normal dry form.

Note: If you are using ready-to-eat, soaked or wet sprouted whole grains you must discount the extra water weight to be comparable to the normal dry form of the grains.

B1. The general formula is:

Total grams of all whole grain ingredients ÷ Total number of servings = grams per serving

Example: A formulation calls for 130g of whole wheat flour and 50g of oats and yields 10 labeled servings. Each serving would contain 18g of whole grain ingredients.

130g + 50g = 180g of whole grain ingredients, total 180g ÷ 10 servings = 18g of whole grain per serving

B2. Alternate computation approach, using percentages and moisture loss:

1) Add up all the whole grain ingredients in a batch **Example:** 100 lbs of whole wheat flour, 25 lbs of whole rye flour, 10 lbs of oat groats = 135 lbs

2) What is the weight of the dough before cooking / baking? **Example**: Total dough weighs 300 lbs including all wet and solid ingredients

3) What is the bake off of moisture? **Example**: 15% bake-off of moisture leaves 255 lbs of finished, as-eaten product

4) Compute the percentage of whole grain in the finished product **Example**: 135 lbs of whole grain ingredients in 255 lbs of finished, as-eaten product gives us a product that is 53% whole grain (135÷255=.529)

5) Apply that percent to a serving of the product **Example**: You know that one serving of the product weighs 33 grams. $33 \times 53\% = 17.49$ grams, so this product is eligible for the 17 gram Stamp

SECOND: Determine whether your membership includes this product.

You may use the Stamp on any *qualifying* products for which *you can verify and guarantee* the whole grain content. This includes two categories of foods:

1. Foods that are totally produced under your control

A. Products you make that carry the company name listed on your membership application.

B. Products made by another subsidiary/division or brand of your company, that carry a different name – as long as you have a corporate-wide membership that also includes these divisions.

C. Private label products you produce and package for customers, sold under the customer's name.

2. Foods that are partially produced under your control

D. Products produced by you but packaged by another company, such as bulk products repackaged by your customer, or frozen dough baked off in your customer's instore bakery.

E. Mixes and concentrates produced by you, if your customer will finish production according to your exact specifications making only simple additions (such as "add water").

In both D and E above, your right to use the Stamp passes through to your customer, but YOU are responsible for your customer's compliance. For example, you will be responsible if you supply Stamps to the customer to affix to your par-baked products after baking, and the

customer misleadingly applies them to non-whole grain products. *Unauthorized use of the Whole Grain Stamp image will result in termination of your membership.*

Note: Flours and Grains

You may use the Whole Grain Stamp on your own whole grain flours and grains, but you may not "pass through" the use of the Stamp to customers using these flours and grains in their products, as there would be no way to control or verify the whole grain content of the resulting products. Encourage your customers to become members of the WGC in their own right!

→ Determining Which Stamp to Use

FIRST: Decide which kind of Stamp Graphic to use: 100%, 50%+ or BASIC.



100% STAMP All grain is whole 100% of grain is whole Minimum 16g whole grain



50%+ STAMP Some refined grain OK At least half of grain is whole Minimum 8g whole grain



BASIC STAMP Some refined grain OK Less than half of grain is whole Minimum 8g whole grain

A. What products qualify for each kind of Stamp?

Products containing at least 8g of whole grain ingredients per labeled serving may qualify to use the Whole Grain Stamp. As shown above:

100% Stamp	Products will use the 100% Stamp with its 100% banner if (a) all the grains in the
	product are whole grains AND (b) the product contains at least 16g of whole grain
	ingredients per labeled serving.

- **50%+ Stamp** Products will use the 50%+ Stamp with its 50%+ banner if (a) at least half of the grain in the products is whole grain **AND** (b) the product contains at least 8g of whole grain ingredients per labeled serving.
- **BASIC Stamp** Products will use the Basic Stamp if (a) less than half their grain is whole grain **AND** (b) the product contains at least 8g of whole grain ingredients per labeled serving.

When in doubt, request the Basic Stamp, and we will upgrade it to the 50%+ or 100% Stamp during our review if your product qualifies.

B. What qualifies as 100% whole grain?

True whole grains contain all three parts of the grain kernel, in proportions the same as those found in nature, as stated in the first paragraph of the definition found on page 1 of this document. For the purpose of the 100% Stamp, *all grains used in a product must be whole grains*.

There are two small exceptions to this mandate:

1) Ingredients that are "outside" the product. If you have used small, token amounts of corn starch or another refined starch as a release agent in your pans or have sprinkled a very small amount of bran on the top of your bread or muffins to give them a more artisan look, your products could still qualify as 100% whole grain. In contrast, if you have added extra bran to your formulation – "inside your product" – to increase the fiber content, your

product would *not* qualify as 100% whole grain (though it would still be a wonderful, healthy product!).

2) Vital wheat gluten. Because extra gluten is often necessary to help whole grain baked goods rise fully, the WGC includes products containing small amounts of extra gluten as "100% whole grain." If gluten exceeds 3% of the total grain, the Basic Stamp should be used.

We will assess each product individually to determine if your product meets either of these exceptions.

SECOND: Decide which number to use on your Stamp.

Once you have calculated the exact whole grain content in grams for each serving of your product, you are ready to choose which number to put on your Stamp. This is the number you calculated in Part B of the First Step. For example, let's say your product is a granola bar containing 18.7g of whole grain ingredients per serving. You could:

A. Use the exact number.

The standard approach is simply to utilize the number you calculated earlier, and use a stamp saying "18g or more per serving" (*note that we do not allow rounding up*). We recommend using the highest qualifying number, to make your product stand out on grocery shelves.

B. Use a lower number.

Since the Stamp says "X or more grams" you may also choose a slightly lower number and still be truthful and not misleading. We allow members to use a number up to 2 grams lower than the actual amount of whole grain present in the product (rounded to the nearest whole gram). You might want to use a lower number if:

- Your product is part of a line of similar products with slightly varying formulations. Perhaps the raspberry granola bar has 18g of whole grain, but the banana has 16g and the peanut butter flavor has 17g. You may choose to put Stamps reading "16g or more" on all three bars.
- You frequently make small reformulations in your products. You might choose to put a Stamp reading "16g or more" on this product, to allow for small changes.

You may have other marketing or product reasons that lead you to be conservative in stating the whole grain content of your products. Of course, you may **NOT** use a higher number than the actual gram content, as that would not be truthful.

THIRD: Pick the file format: 4-color process, spot color, or black & white.

Hi-resolution PDF files are available for printing in (a) four-color process (b) PMS Spot Color or (c) black & white.

We highly recommend that you use the color versions of the Stamp, as you will get more marketing value from the visibility and consumer familiarity of the standard black and gold Stamp. You can locate the Stamp graphics by logging into your account and choosing **Download Stamp Graphics**. If you do not see the Stamp you need, contact us.

GRAPHIC NOTES

Designers and printers may want to know the following:

- In the SPOT format, the gold color is PMS 130.
- In the 4C format, the gold color is 0%C 27%M 100%Y 0%K.
- All fonts have been changed to outlines.
- Stamps were created in Illustrator and will also open any other current graphic software. If you have older or different graphic software, we will do our best to create a file that will open in your software.

FOURTH: Pick an appropriate size and location for the Stamp.

What about size? The Stamp graphics are PDF vector graphics, so they can be resized to be larger or smaller with no loss of quality. There is no minimum or maximum allowable size for the Stamp graphics, but the Stamp and all its type MUST be legible. The size that is completely legible may vary depending on the printing process and materials you're using.

What about position? You may place the Stamp anywhere on your package. Of course, you will get the most marketing benefit from placing it on the front panel, but we realize you have many considerations in designing your package, so we allow it to be on any part of the package. There are also no restraints about distance from other graphic objects.

What about materials other than packaging? Once a product has been approved to use the Whole Grain Stamp, the Stamp can appear on any packaging, collateral, advertising, websites, or other materials associated with that product. Although it is not required, we are always happy to review your materials and advise you if you would like.

FIFTH: Do not modify the Stamp without prior written approval.

The marketing value of the Stamp derives from its recognizability as a brand. Appearance – graphics, colors, proportions, text and fonts - of the Stamp cannot be modified in any way without prior written approval.

We have occasionally given permission for minor variations in Stamp color when the integrity of the Stamp is not affected - i.e., when consumers would be unlikely to notice that any change has been made. Contact Vik Bensen (Vik@oldwayspt.org) if you have guestions, color requests, or special circumstances you'd like to request.

→ Registering Each Product with the Whole Grains Council

FIRST: File a One-Time Stamp Agreement Form with the WGC.

The Stamp Agreement Form is a one-time form that companies must sign before they start using the Whole Grain Stamp on their products. It basically says that you are authorized to use the Stamp, as a member in good standing of the WGC, that you agree to follow all the Council's rules and guidelines for Stamp usage, and that you understand that the Stamp program is a private industry effort and not an official program of any country's government. We will send you a copy of this form to sign, as soon as we receive your first year's dues.

SECOND: File a Product Registration Form for EACH Product Using the Stamp.

The Whole Grains Council maintains a record of each product licensed to use the Whole Grain Stamp. Before any product appears publicly with the Stamp, you must file an online Product Registration Form with information about the product.

A. Where is the Product Registration Form?

Our product registration form is available online. Here's how Members may access this form:

- 1. Go to WholeGrainsCouncil.org, and click on "For Members" in the upper right corner
- 2. Log in, using your company username and password
- Click on the Register Products for Stamp Use link under My Account on the left.

If for any reason you have technical difficulties with the online registration process, email Vik Bensen (Vik@oldwayspt.org) or call 1-617-896-4810 and we'll help you out.

B. What's on the Product Registration Form?

The Product Registration Form asks for identifying information about your product, but does *not* require you to divulge your formulation or any other proprietary information. Here's what's on the form, in case you want to know before you become a member and can see it online.

The following facts are <u>required</u>* on the Product Registration Form:

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Product Name*	the name that appears on the product in the store	
Brand Name*	the brand name consumers will see on the label	
UPC Code	the 12-digit UPC code for this product (numbers only)	
Product Categories*	check 1 to 3 categories (bread, cereal, flour, etc.)	
Additional Criteria	check foodservice, gluten free or sprouted grain if these apply	
Nutrition Facts*	upload information from this product's Nutrition Facts Panel	
Ingredients*	upload or type the ingredients list for this product	
Which Stamp*	indicate whether you're seeking the Basic, 50%+ or 100% Stamp	
Serving Size*	serving size indicated on the label of this product	
Total Grains*	how many grams of total grains in a serving?	
Whole Grains *	how many grams of <u>whole</u> grains are in a serving?	
Stamp Number*	what number of grams will appear on the Stamp on this product?	
Country(ies)*	where will this Stamped product be sold?	
FSIS*	does this product contain meat or poultry (subject to FSIS)?	
Timing*	when shall we publicly list this on our website?	
	Immediately? Never? Later (specify date)?	

Why do we ask when we can list your product publicly? We will always keep your product plans confidential until you want them known – after which date we will do whatever we can to help spread the word to consumers and the media.

C. Why must we file a form for EACH product?

There are three important reasons to file a form for each product:

- 1. You need to make sure you have chosen the right Stamp for your product before you go to the expense of printing packaging
- 2. We need your information on file, to ensure the integrity of the Stamp program
- 3. We use our Product List to help promote our members' products. We rely on the Stamp Product List when journalists call us and say, "Who's making whole grain cookies?" or "How many different whole grain pastas are on the market?" We also post this list on the WGC website, giving your products extra promotional exposure (unless you ask us not to). You can see the list at http://www.wholegrainscouncil.org/find-whole-grains/stamped-products.

D. How do we know if our Form is approved?

The WGC staff will email you so you'll know your form has been received, processed, and approved. Please make sure to note the details of your approval email, as we may have approved your product for a different Stamp or a different gram number than you originally requested. **This process takes 1 -2 weeks.** If you have an urgent deadline, please contact us. Although it is a rare occurrence, we can try to work with you to help expedite your product approval.

E. What happens when an approved product is updated?

When changes are made to a previously approved product, you must let the WGC know. If changes are made to the product name, brand name, or UPC, we can edit the original record with the updated information. However, if changes are made to the formulation, serving size, or grain calculations, you must re-submit the product for approval.

→ Legal Compliance for the Whole Grain Stamp

It is the responsibility of each company to ensure that the qualifications described herein have been met with respect to each product utilizing the Stamp. Companies are advised to consult their own legal counsel regarding compliance with the Guidelines and whether use of the Stamp is appropriate for their products and their company, in the intended countries. The WGC makes no representations or warranties to companies or third parties with respect to whether such qualifications have been met.

The Stamp is a private, self-regulatory industry program, not a program of any country's government. Use of the Stamp is at your own risk, and it is the responsibility of each individual company to ensure compliance of all elements of its packaging with all applicable government regulations.

Please note that this Stamp Usage Guide applies to most products sold in the United States, with the exception of meat and poultry products requiring FSIS review. If you are using the Whole Grain Stamp on FSIS products in the U.S., or on products outside the U.S., please see our other Stamp Usage Guides, posted under How to Use the Stamp in the For Members section of our website.

→ Merging Two Whole Grains Council Membership Accounts

When two Whole Grains Council member companies merge their accounts (for instance, because one member company has been acquired by another), there is administrative work required in transferring the ownership of product registration files and getting the new account/contacts set up. For this reason, the WGC charges a one-time administrative fee when two accounts are merged. The administrative fee is assessed on a sliding scale based on the combined overall revenue of the new (single) member company as follows:

- \$200... if company sales are up to \$50 million
- \$1000... if company sales are \$50 million to \$250 million
- \$2500... if company sales are over \$250 million

→ Termination of Whole Grain Stamp Usage

Once a product has been approved to use the Whole Grain Stamp, that approval is valid for the life of the product, provided the formulation remains as originally submitted – and provided that the company continues to be a paid-up member in good standing of the Whole Grains Council.

If any ingredients or nutrition facts change, contact Vik Bensen (<u>Vik@oldwayspt.org</u>) for instructions on how to update your product.

The Whole Grain Stamp is a registered certification trademark, and its use – as with any other licensing agreement – is contingent on your continued payment of licensing fees included in your WGC annual payment. If your company fails to make timely payment of the aforementioned licensing fees and is therefore no longer a paid-up member in good standing of the Whole Grains Council, your right to use the Whole Grain Stamp ceases immediately without further notice from the WGC; you may no longer advertise, manufacture, sell, or ship any products bearing the Whole Grain Stamp or make any other use of the Whole Grain Stamp. In the event that your company's membership is not renewed for any reason, your company must sign a Stamp Use Ended form attesting that all Stamp use has ended. However, the Whole Grains Council has the right to revoke your right to use the Stamp and order you to cease and desist from any use of the Stamp, whether or not you submit a Stamp Use Ended form. In addition, if you continue using the Stamp after you are no longer a member, you still must pay the full amount of the membership fee for any years in which your

use of the Stamp continues and you may also be liable for other damages for breach of this Agreement, including attorney's fees.

→ Questions

If you have any questions about proper implementation of the Whole Grain Stamp, please contact Vik Bensen (<u>Vik@oldwayspt.org</u>) or call 1-617-896-4810.

Thank you for working with the Whole Grains Council to make this a successful program both for consumers and for your company. We appreciate your efforts to help whole grains and better health spread around the globe.

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