



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

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Julie Brewer  
Chief, Policy and Program Development Branch  
Child Nutrition Division, FNS / USDA  
3101 Park Center Drive, Room 640  
Alexandria, VA 22302-1594

Re: Nutrition Standards in the National School Meals Programs

April 8, 2011

Dear Ms. Brewer,

The Whole Grains Council is a non-profit consumer-advocacy group that is part of 501c3 educational organization Oldways. The Whole Grains Council (WGC) helps consumers find whole grains and understand their benefits, helps manufacturers and restaurants offer more and better whole grain products, and helps the media to write accurate and compelling stories about whole grains.

Oldways and the WGC applaud USDA for its proposed improvements to the quality of school meals, including the overall emphasis on "consumption of naturally nutrient-dense foods, such as whole grains, fruits and vegetables" and "reduc[ing] schools' reliance on highly fortified foods." Oldways, as creator of the Mediterranean Diet Pyramid, is pleased to see this strong emphasis on real foods, and we are especially pleased to see a strong requirement for whole grain foods.

As your department works to finalize these rules, we would like to offer some comments and suggestions about the proposed definition of "whole grain rich" foods and the best way to label these foods.

#### **"Whole Grain Rich" = 8g or more of whole grain per serving**

The IOM report on school meals stated as its first definition of "whole grain rich" in Box 7-1 that "the whole grains per serving... must be  $\geq 8$  grams." On page 125, the IOM report goes on to state that "... the goal of the criterion is to ensure that foods qualify as whole grain-rich if they contain at least 8g of whole grains..." and that the other elements in Box 7-1 were included because "current labeling regulations and practices limit the school food service purchaser's ability to know the actual whole grain content of many grain products."

The IOM report's standard of 8g is not clearly re-iterated in the proposed school food rules, and we would urge that this standard be clarified and reinstated, either in the final regulation and/or in the accompanying guidance and Food Buying Guide, for two important reasons:

a. **A gram-content labeling system already exists.** Labeling foods that supply 8g or more of whole grain per serving is an established standard across all manufacturers, due to the widespread use of the Whole Grain Stamp. There is no standard labeling for "51% of the grain is whole grain" –



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and in fact FDA discourages use of percentages except as a *percent of total weight*, so such labeling would likely be difficult to accomplish without FDA harmonization. (FDA's approval of the term "100% whole grain" is the only exception to this that we're aware of.)

As of April 2011, the Whole Grain Stamp packaging symbol is on more than 5,000 products in 22 countries, including about 4,250 products in the United States. Since this packaging symbol's introduction in 2005, 275 manufacturing companies have adopted the Whole Grain Stamp, and are familiar with the WGC's process for reviewing products. Consumers have also come to look for the Stamp. Use of an existing, established standard would speed implementation of the new school food rules both for schools and for manufacturers.

b. **Kids get more whole grains.** 8g of whole grain out of 14.75g total grain in a school food serving gives the kids 54% whole grain, instead of 51%. Although this is a small change, every little bit helps.

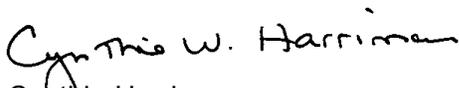
**Goal: All grain foods in school meals should be whole grain-rich**

We support USDA in its goal of requiring all grain foods in school meals to be whole grain-rich after a certain period of adjustment during which half of grain foods must be whole grain-rich. This is easily do-able because so many schools already serve whole grains and their kids have already become accustomed to whole grains as the new norm. And, manufacturers already offer a wide variety of popular, kid-tested whole grain foods.

At the end of this letter, we've attached testimonials from several schools that have participated in our annual Whole Grains Challenge for foodservice operators. We hope that these in-the-trenches reports will reinforce USDA's positive momentum in requiring more whole grains in schools.

Oldways and the Whole Grains Council appreciate this opportunity to provide input as USDA works toward final regulations for school lunch and school breakfast, and we stand ready to offer our services to USDA and to the school foodservice community in any way that would help to clearly label foods that qualify as whole grain-rich.

Sincerely,

  
Cynthia W. Harriman  
Director of Food and Nutrition Strategies  
Oldways and the Whole Grains Council

## **Students Come to Expect Whole Grains as the New Norm**

*We've eliminated the use of white breads in our kid-friendly options like Hamburgers and Grilled Cheese. The children have responded well, not once asking to have white bread. We are very proud of the success of whole grains in our lunch program. We have also noticed the students beginning to experiment more with whole grains options besides brown rice.*

Andy Towler, Food Service Manager, Village Community School, NY, NY

*We combine whole grain items with guaranteed kid-pleasers, e.g. cheese pizza on whole grain crust, to encourage kids to incorporate whole grains into their daily diet, and to impress upon them that eating healthy whole grains can be tasty.*

Joe Cappa, Director of Dining Services, Charlotte (NC) Latin School

*Our schools serve only whole grain breads and rolls, pasta and also our pizza crust is whole grain.*

Kimberly Radzinski, Director of Food Services, Henking School, Glenview, IL

*We have not served white loaf bread in the district for over four years... and we have switched for the most part from white to brown rice.*

Kari Doffing, Food Service Director, Farmington (MN) public schools

*We ... have taken almost all of the white or enriched white bread off the menu at the elementary level and replaced with either whole wheat or blended wheat bread. This will be the second year we have been using strictly wheat bread for all breakfast toast and sandwiches at lunch. The children have eased into the transition slowly but it is gaining popularity as time goes on.*

Terry Lowe, Assistant Food Service Director, Ames (IA) public schools

*In the Enumclaw School District, we serve only whole grain breads to the elementary and middle school students. While students at the high school have a choice of breads for deli sandwiches, all of our buns, pasta and rice are whole grain.*

Tray Holyan, Food Services Supervisor, Enumclaw (WA) public schools

*Not only does Willamina School District serve whole grains every day, we also have nutrition classes featuring whole grains for our elementary level students, where they can follow the production of wheat flour from seed to bread.*

Lynne Duda, Nutrition Services Director, Willamina (OR) public schools