



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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USA Rice Federation



266 Beacon St., Boston, MA 02116
Tel: 617.421.5500
www.wholegrainscouncil.org

Dr. Jan Delcour
AACCI President
3340 Pilot Knob Road
St. Paul, MN 55121

19 November 2013

Dear Dr. Delcour,

In May 2013, AACCI characterized a whole grain food as one containing "8 grams or more of whole grain per 30 grams of product." This move represents a helpful preliminary step toward standardizing a whole grain definition.

However, on further analysis, the characterization has three important and serious limitations which, if allowed to persist, would have negative consequences for consumers, for health, and for whole grain momentum.

- 1) Foods in four categories would likely be ineligible to be considered as whole grain foods, even when most or all of their grains are whole grains and when the foods contain more than 8 grams of whole grain.
- 2) Many foods containing more refined grain than whole grain would easily qualify as "whole grain foods," which could be considered misleading.
- 3) Moist foods, such as bread and bagels, would be required to contain a much higher percentage of their grain as whole grain than dry foods, such as crackers, pasta, and RTE breakfast cereals.

AACCI's definitions are widely respected around the world, and have often served as the basis for regulatory decisions, both in the US and elsewhere. Because of AACCI's position of authority, it's essential that any definition of a whole grain food endorsed by AACCI be inclusive of all foods high in whole grain content, while excluding those made primarily with refined grains.

Oldways and the Whole Grains Council strongly favor defining a whole grain food as "a food where at least half the grain is whole grain and which contains at least 8 grams of whole grain per labeled serving."

At the 2013 AACCI Annual Meeting in Albuquerque, the AACCI Whole Grains Working Group determined that concerns such as those of the Whole Grains Council should be forwarded to the AACCI Board before any further action is taken to comment to the FDA docket on the AACCI Characterization of a Whole Grain Food.

Therefore, Oldways and the Whole Grains Council are writing today to detail the three limitations above, and to suggest an alternative definition. We hope that our observations and comments may be helpful to AACCI in its ongoing work to arrive at a comprehensive definition.

Sara Baer-Sinnott
President

Cynthia Harriman
Director of Food & Nutrition Strategies

(See following pages for details)

Limitation #1: Excludes Foods in Four Categories

The WGC analyzed 7615 products registered to use the Whole Grain Stamp as of January 2013. **We found that 12% of foods we reviewed contained significant amounts of whole grain and yet would likely be unfairly excluded by the current draft of the AACCI Characterization of a Whole Grain Food.** These foods fall into four major categories. We have included examples for each category below, to help AACCI assess what changes might need to be made in its Characterization, to make it inclusive of all food categories.

1. Foods naturally very high in water weight, such as brown rice milk or soups.

Examples:

- (1) Brown rice milk with 16g whole grain per 250g serving; contains no refined grains.
- (2) Chicken Noodle Soup with 38g whole grain per 312g serving; traces of rice starch are the only refined grain ingredient.

2. Foods that qualify in dry form, but not when sold in cooked/as eaten form because of the weight of added water.

Examples:

- (1) Heat & serve steel-cut oatmeal with 41g of whole grain per 284g serving; contains no refined grains.
- (2) Heat & serve black pearl sticky rice with 37g of whole grain per 180g serving; contains no refined grains.

3. Dishes or meals where grains are just one component of the serving size, because the other ingredients weigh so much.

Examples:

- (1) Chicken and vegetable pasta with 40g of whole grain per 255g serving; 0.54g cornstarch is the only refined grain ingredient.
- (2) Vegetable egg rolls with 19g of whole grain per 85g serving; wrapper is primarily whole grain.
- (3) Dry whole grains and beans soup mix with 17g of whole grain per 128g serving; contains no refined grains.
- (4) Whole wheat pizza with 51g of whole grain per 213g serving; crust is primarily whole grain.
- (5) Shrimp breaded with whole grain, with 16g of whole grain per 85g serving; breading is primarily whole grain.
- (6) Whole wheat ham sandwich with 27g of whole grain per 120g serving; bread contains only whole wheat flour and a small amount of wheat gluten as grain ingredients.

4. Foods that typically contain less than 26.7% (8/30) grain overall.

Some foods normally considered as “grain foods” typically contain lower amounts of grains, such that they would not reach the 8/30 threshold even if *all* of their grain is whole grain. Marquart et al., in *Cereal Foods World*, May-June 2006, vol 5 no 3, listed the overall grain content of a range of foods, including brownies and cookies (20% flour), muffins (25% flour), and cake (24% flour).

Examples:

- (1) 100% whole grain brownie with 9g of whole grain per 40g serving; contains no refined grains.
- (2) Whole grain carrot cake with 8g of whole grain per 80g serving; only refined grain is cornstarch in the cream cheese icing.
- (3) Whole grain cranberry nut muffin with 10g whole grain per 59g serving; contains no refined grains.

Limitation #2: Includes Some Foods Primarily Made with Refined Grains

Some dry foods such as crackers, breakfast cereals and pasta contain more than 16 grams of grain in each 30 grams of product. Ready To Eat cereals contain an average of 21 grams of grain in each 30 grams; crackers 25.5 grams grain in each 30 grams; and pasta generally 30 grams of grain in each 30 grams.

When these foods contain only the minimum 8 grams of whole grain with the balance as refined grain, the foods would be made primarily with refined grains. The cereal and crackers could contain around twice as much refined grain as whole grain and still qualify for the AACCI characterization, while the pasta could contain almost three parts refined grain for each part of whole grain. While these foods may contribute to whole grain consumption, calling such foods “whole grain foods” seems at odds with common sense.

Limitation #3: Puts Moist Foods at a Disadvantage

The ideal definition would treat all food categories equally. However, because the AACCI approach is based on a percentage of total weight, food groups with a higher water content must meet a higher standard than drier foods. The table below illustrates the problem:

Food category	% flour overall	Flour in 30g	% wg to qualify
Bread	51%	15.3g	52.3%
Bagel	50%	15.0g	53.3%
RTE Cereal	70%	21.0g	38.1%
Crackers	85%	25.5g	31.4%
Pasta	100%	30.0g	26.7%

Source: Marquart et al, Cereal Foods World, May-June 2006, vol 5 no 3

This “bias to the dry” not only unfairly includes dry foods like crackers even when they’re made mostly with refined grains (as explained previously) but also unfairly sets a higher standard for moist foods like breads and bagels. (See below; we think all foods should meet a higher standard equally – we do not advocate *lowering* the bar uniformly!)

Alternate Definition Recommended by Oldways and the Whole Grains Council

Oldways and the WGC believe that the ideal definition of a whole grain food will:

- a. Include *all* foods containing more whole grain than refined grain, while excluding foods that contain mostly refined grains.
- b. Encourage manufacturers to make whole grain options available in *all* categories.
- c. Help consumers increase whole grain consumption from *all* sources and categories.

Consequently, we favor defining a whole grain food as **“a food where at least half the grain is whole grain and which contains at least 8 grams of whole grain per labeled serving.”** This definition would include all foods that are primarily whole grain, as long as they contribute a significant amount of whole grain.

In addition to addressing the limitations above, this definition harmonizes well with new U.S. school food rules, and with current USDA FSIS rules. It also satisfies the FDA mandate to be “truthful and not misleading” by excluding foods that contain more refined grain than whole grain.

As trusted and useful as the Whole Grain Stamp has become, its mission has always been to quantify a product’s whole grain content rather than to define which foods should be called whole grain foods for research or regulatory purposes. Oldways and the WGC fully support the development of a standard definition for what qualifies as a whole grain food, as this would further support increases in whole grain consumption for better health.