

November 10, 2020

To Whom It May Concern:

The Oldways Whole Grains Council would like to thank you for giving our organization the opportunity to offer feedback on the General Specification for Definition and Labeling of Whole Grains and Whole Grain Foods for China.

Our organization has been involved in whole grain labeling and standards in the United States and in many other countries for the past 15 years, and we hope our comments and experience will be helpful to your team.

About the Oldways Whole Grains Council and the Whole Grain Stamp

Oldways is a 501(c)3 educational nutrition nonprofit, founded in 1990 and dedicated to inspiring good health through cultural food traditions. We are perhaps best known worldwide for creating the Mediterranean Diet Pyramid in 1993 with the Harvard School of Public Health and for our work promoting whole grains, and creating the Whole Grain Stamp.

The Oldways Whole Grains Council is an Oldways program, initiated in 2003, with the threefold mission of (1) helping consumers find whole grain foods and understand their health benefits, (2) helping manufacturers and restaurants create delicious whole grain products and meals, and (3) helping the media write accurate, compelling stories about whole grains. We fulfill this mission through our many educational programs, and through our administration of the Whole Grain Stamp program. Our iconic Stamp packaging symbol appears on more than 13,000 products in 63 countries and helps shoppers easily identify products which contain significant amounts of whole grain ingredients.



The Whole Grain Stamp has been used in China since 2011. Currently, 124 products have been approved to use the Whole Grain Stamp in China. These products are produced by 6 companies based in China and 15 multi-nationals based outside China.

Standards for Using the Whole Grain Stamp

The Whole Grain Stamp has three versions: the 100% Stamp, the 50%+ Stamp, and the Basic Stamp. The 50%+ Stamp was a new addition to our family of Stamps in January 2017



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and today about three-quarters of the products available worldwide qualify for either the 50%+ Stamp or 100% Stamp.

The 100% Stamp

If a product bears the 100% Stamp, then *all* its grain ingredients are whole grain. There is a minimum requirement of 16 grams of whole grain per labeled serving for products using the 100% Stamp.

The 50%+ Stamp

If a product bears the 50%+ Stamp, then at least half of its grain ingredients are whole grain. There is a minimum requirement of 8 grams of whole grain per labeled serving for products using the 50%+ Stamp.

The Basic Stamp

If a product bears the Basic Stamp it contains at least 8 grams of whole grain per serving, but the product may contain more refined grain than whole grain.

The standards for the Whole Grain Stamp are modified to align with local whole grain labeling regulations in specific countries. For example, in Canada local law requires that products labeled “100% whole grain” must have all their ingredients be whole grains (no salt, oil, or any other ingredients may be included), so in Canada that is the standard we use for approving products to use the 100% Stamp.

Comments on Your Proposed Standards and Definitions

We applaud the Chinese Nutrition Society and others for embarking on such a momentous undertaking in an effort to increase whole grain consumption. There is no one perfect standard. In many cases, standards are restricted by existing food safety regulations and guidelines. However, here are some points that may help China in choosing a standard for whole grain labeling. We welcome you to consider the following criteria:

1. Start with a solid definition of a whole grain ingredient. It’s not possible to define a standard for whole grain foods until a clear definition is agreed upon for a whole grain ingredient. This definition is especially important because the nutritional specifications of each whole grain varies widely from one grain to the next. For example, brown rice typically has about 3 grams of fiber per 100 grams, while hulled barley can have upwards of 17 grams of fiber per 100 grams. Even within a single grain category, such as wheat, we see differences in nutrients (such as fiber and ash) based on the specific variety of wheat planted.

In response to your statement that there are “no uniform rules both at home and abroad” for which ingredients are defined as whole grain, we encourage you to consider the whole grain food definitions that already exist, including those with broad international support. Specifically, we highly recommend the [Whole Grain Initiative’s definition of whole grain as a food ingredient](#), as it takes into account additional specifics of standard milling practices, going beyond the basic Cereals and Grains Association (formerly known as AACCI) definition (all of the bran, germ and endosperm in their original proportions). Another key area of agreement between these international definitions is that whole grains include cereal grains and pseudo grains, and that oilseeds and legumes (although an important part of a healthy diet) are not a part of the whole grain food group because they have different nutritional characteristics. If China wishes to harmonize their definition of a whole grain ingredient with other widely accepted international definitions, we encourage you to consider identifying legumes as part of a separate food group.

Lastly, in response to the statement that “there is no unified definition of ‘whole grain foods,’” we are pleased to share that the Whole Grain Initiative’s Working Group on Whole Grain Definition is finalizing their whole grain food definition. To view the draft, please contact the working group chair at <http://www.wholegraininitiative.org/en/1179-wgi-working-groups>.

2. Set levels that are meaningful but attainable. In response to your statement that “foods labeled ‘whole grains’ on product packaging should contain sufficient amounts of whole grains to provide health benefits,” we urge you to consider the benefits of incremental change. Most research on the benefits of whole grains looks at aggregate whole grain intake over time, where even the smallest of servings can add up. A whole grain labeling standard should have minimum levels that are high enough to make a significant difference in whole grain consumption and health, but low enough that both consumers and manufacturers can start gradually and work their way up. The Whole Grain Stamp’s use of both Basic and 100% Stamps, and its use of specific gram amounts (see #3) support both meaningful minimums and the upward path.

3. Use specific amounts of Whole Grain Content. We strongly agree with your statement that “product labels with levels of whole grains can help customers identify whole grain foods.” Standards that transparently document specific amounts of whole grain content encourage manufacturers to increase whole grain content over time, and help consumers compare similar products. For this purpose, a standard like the Whole Grain Stamp – which specifies the grams of whole grain in a serving – is more effective than an unchanging, nonspecific symbol.



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Because it is not currently possible to quantify whole grain content using lab analyses, third party whole grain labeling, such as through the Oldways Whole Grains Council, is used to manage compliance and certify that the products contain the stated amount of whole grain. Determining the whole grain content of a product requires a clear understanding of what counts as a whole grain versus a refined grain (and what doesn't count as a grain ingredient at all), along with information about the product's formulation and nutritional profile. By providing this base level of whole grain knowledge and working with manufacturers to gather the formulation information required, the Oldways Whole Grains Council determines appropriate Whole Grain Stamp use accurately and consistently. This is why third party certification via the Whole Grain Stamp program has been particularly effective in communicating whole grain content with consumers. We support your conclusion about the effectiveness of 3rd party labeling and compliance through the Oldways Whole Grains Council.

4. Consider Dry Matter vs. As Consumed. Standards using dry matter (such as the Denmark and EU HealthGrain standards) allow many different foods to take part on an even basis. "As consumed" standards, which compare whole grain to the weight of the full finished product, make it harder for moist foods like bread or cooked oatmeal to reach the specified level. Under the Cereals and Grains Association standard, for example, a dry food like pasta could qualify if 26.7% of the grain were whole grain. Bread – with typical moisture levels of 40% of total weight – would need about half of its grain to be whole grain, to reach the 8g/30g Cereals and Grains Association standard.

5. Include all types of foods. It's important to choose a standard that will be inclusive of all types of foods, including mixed foods (like frozen dumpling or ready-to-eat rice and vegetable bowls, where non-grain ingredients make up the majority of the weight), processed foods, and partially whole grain foods. As strong advocates for increasing whole grain intake, the Oldways Whole Grains Council recognizes that partially whole grain products play an important role – especially for consumers who are new to whole grain foods – and can be great first steps as people move along their journey to better health.

We strongly advocate for the inclusion of whole grain ingredients in as many products and food categories as possible. Although we understand your statement that "the use of whole grain labels should be avoided to make oil, salt, and high-sugar products look healthier," we worry that that focusing only those nutrients which are meant to be limited in the diet does not give consumers the full picture. It is just as important for consumers to understand the beneficial contributions that a product will make to their overall diet as it is to warn of them of the more negative nutritional attributes of that product. Most foods are not just good or bad, and often have a mix of both beneficial and detrimental



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ingredients. Nutrition change is almost always incremental, and we urge China not to let the perfect be the enemy of the good.

Please don't hesitate to reach out via email if we can be of any further assistance or provide any additional resources or information.

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