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To Whom It May Concern:

Oldways and its Whole Grains Council would like to thank your team for giving our organization the opportunity to offer feedback on ANVISA's Alimentos à Base de Cereais Integrais Documento de base para discussão regulatória. We wholeheartedly applaud ANVISA's thorough consideration and investigation of the issues pertaining to the creation of a whole grain definition for both raw ingredients and composite foods.

The discussion document your team has circulated is impressive in both its transparency and detail. The process by which your team sought answers—through surveys, scientific studies, technical visits, a survey of international perspectives and policies, and a reasoned weighing of the advantages and disadvantages of various regulatory options—has yielded proposed regulations that are clear and well-reasoned, and we are enthusiastic about the results. Our organization has been involved in whole grain labeling and standards in the United States and in many other regions and countries for almost 15 years, and we hope our comments and experience will be helpful to your team.

#### **About Oldways, the 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 12,000 products in 61 countries and helps shoppers easily identify products which contain significant amounts of whole grain ingredients.

The Whole Grain Stamp has been used in Brazil since 2010. Currently, 534 products have been approved to use the Whole Grain Stamp in Brazil. These products are produced by 13 companies based in Brazil and 6 multi-nationals based outside Brazil.

#### **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 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.

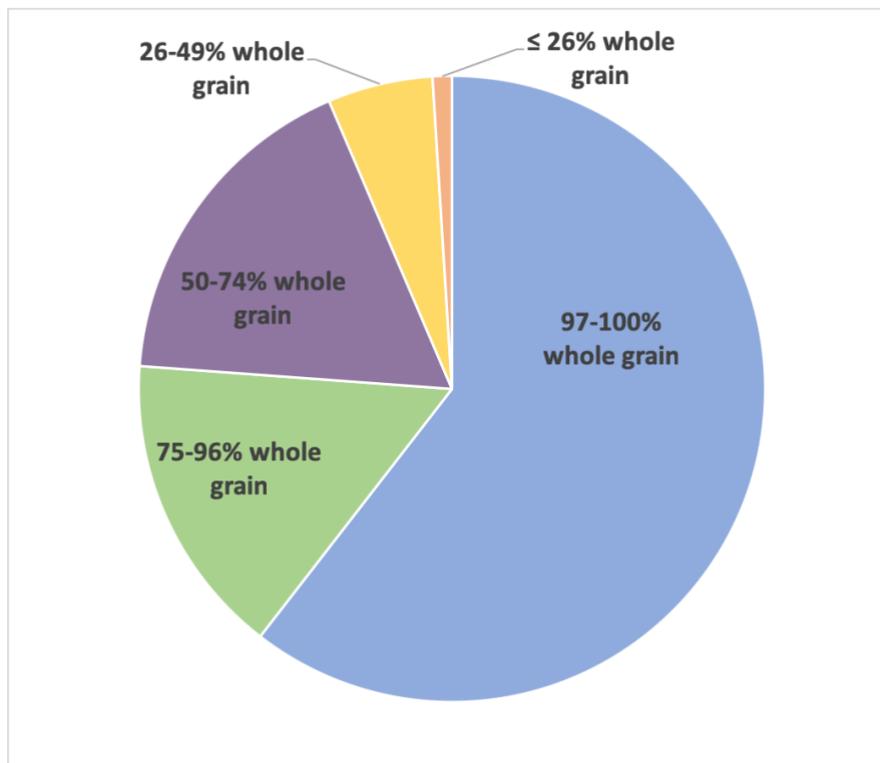
### *The Basic Stamp*

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.

In your Whole Grain Based Foods Document you state that, “the quantitative declaration of whole ingredients on product labeling received broad support... presenting itself as a way of providing greater clarity about the composition of the product, encouraging competitiveness between manufacturers and stimulating consumption by the population.” We completely agree with this evaluation and that’s why each of our Stamp symbols also specifies the number of grams of whole grain content per serving (portion).

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.

The vast majority of products that use the Whole Grain Stamp worldwide already make at least half their grain whole grain, with only 6% of products falling beneath this threshold. While we don’t currently collect data on the percentage of a product’s dry weight made up by whole grain ingredients, we suspect that almost all products currently using the Whole Grain Stamp in Brazil would continue to qualify for whole grain labeling under the proposed definitions outlined by ANVISA.



*Three-quarters of products using the Whole Grain Stamp worldwide have 75% or more of their grain as whole grain, as shown above.*

## Comments on Your Proposed Standards and Definitions

### 1. Whole Grain Ingredient Definition

We recognize your preference for the whole grain ingredient definition derived from New Zealand and Australia regulations and from the definition established by AACCI (option 2 in your report). While we agree that this definition has significant advantages over the other three options you've outlined, we highly recommend that you consider the [HealthGrain Forum definition](#), as it takes into account additional specifics of standard milling practices that are consistent with safety and quality, thereby improving on the basic AACCI definition.

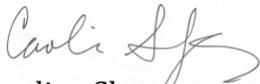
### 2. Whole Grain Composite Food Definition

We applaud your choice of composite food definition, as we believe the definition you have outlined does two very important things. (1) This definition sets a minimum whole grain content level (30%) which is both meaningful and attainable and (2) this content level is determined based on the product's dry weight, which allows many different foods to take part on even footing, regardless of a product's moisture content.

### **3. The Need for a Definition of Refined (Non-Whole) Grain Ingredients**

Because your proposed whole grain composite food definition includes the requirement that foods labeled “whole grain” must contain more whole grain ingredients than refined grain ingredients, we recommend that you consider clearly defining which grain ingredients should be considered refined. For the purpose of the Stamp program, we define refined grains to be any grain-derivative that is missing some or all of its bran, germ or endosperm, including ingredients like refined wheat flour, pearled barley, corn starch, wheat germ, oat bran, wheat gluten, etc. We find that without a clear definition, there is confusion among manufacturers and consumers about what does and does not count when measuring the refined grain content of a product (for the purpose of comparing it with the whole grain content of the product).

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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