

Whole Grain Labeling Regulations in Brazil

The Oldways Whole Grains Council is aware that Brazil is currently considering standards for labeling whole grain foods and ingredients. As our organization has been involved in whole grain labeling and standards not only in the United States but in many other regions and countries, we would like to share our experience with the people of Brazil, in case it could be helpful.

About Oldways, the Whole Grains Council, and the Whole Grain Stamp

Oldways is a non-profit nutrition education organization, founded in 1990 to inspire 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.

The Oldways Whole Grains Council is an Oldways program, initiated in 2003, with the mission stated above in our letterhead. We fulfill this mission by carrying out a wide range of educational programs, and through the Whole Grain Stamp, a packaging symbol used on more than 11,000 products in 55 countries, to help shoppers easily identify products containing significant amounts of whole grain ingredients.



The Whole Grain Stamp has been used in Brazil since 2010. Currently, 115 products have been approved to use the Whole Grain Stamp in Brazil. These products are produced by 8 companies based in Brazil and 2 multi-nationals based outside of Brazil.

Standards for Using the Whole Grain Stamp

The Whole Grain Stamp has two versions: the 100% Stamp (shown on the left) and the Basic Stamp (shown on right).



1. The 100% Stamp

This symbol can be used on products where *all* of the grain is whole grain. The product must contain at least 16 grams of whole grain per labeled serving. Each Stamp specifies the number of grams of whole grain content per serving (portion).

2. The Basic Stamp

This symbol can be used on products made with a mix of whole grain and refined grain. The product must contain at least 8 grams of whole grain per labeled serving. Each Stamp specifies the number of grams of whole grain content per serving (portion). Although 100% whole grain products offer additional health benefits, products made with a mix of whole and refined grain can help consumers transition to the nuttier, fuller taste of whole grains, so having both symbol options is important.

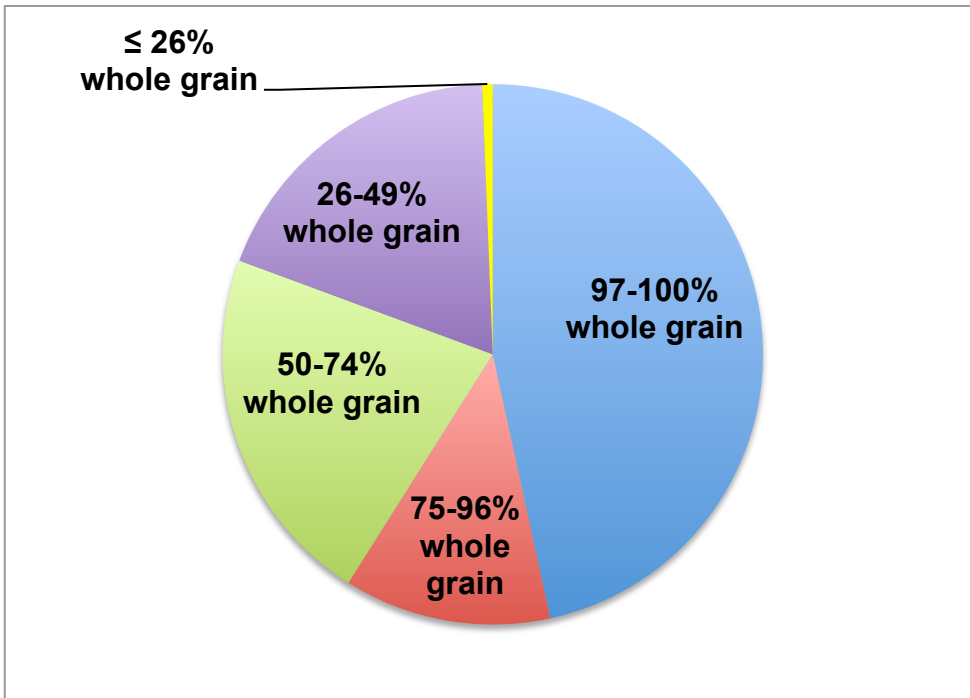
Why did we choose 8 grams as our minimum? The U.S. Dietary Guidelines recommend that most adults should eat 48g or more of whole grains daily (six servings of grain foods containing at least 16g of grain ingredients; and that at least half of grains consumed should be whole grains). Choosing products with the Whole Grain Stamp for all six grain servings guarantees that someone will reach the 48g minimum.

The standards for the Whole Grain Stamp are modified to align with any 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 as whole grains (no salt, oil, or any other ingredients) so in Canada that is the standard we use for approving products to use the 100% Stamp.

Companies interested in using the Whole Grain Stamp on their products pay an annual administrative fee, on a sliding scale according to company size. This fee gives them the right to use the Stamp on qualifying, approved products; surplus fees are used to fund the Oldways Whole Grains Council’s educational programs. For each product, companies must submit information about their products for WGC review and must receive approval before using the Stamp publicly on their products.

Worldwide, the Stamp Encourages Competition for More Whole Grain

While 8 grams per serving is the minimum amount of whole grain content that qualifies a product to use the Whole Grain Stamp, in fact most products contain amounts far above the minimum. The gram-number on each Stamp encourages shoppers to pick products with higher and higher numbers as they become more accustomed to the fuller, nuttier taste of whole grains – and encourages a positive competition among food manufacturers to show that their products are providing more value to consumers, by providing higher levels of whole grain.



Nearly two-thirds of products using the Whole Grain Stamp worldwide have 75% or more of their grain as whole grain, as shown in the graph above.

Whole Grain Levels in Products, by Category and by Region

While “transition products” made with a mix of whole and refined grain are helpful in changing consumer tastes gradually, the market shows that companies in the US, throughout Latin America, and in Brazil, are all offering a range of products that, on average, have a fairly high level of whole grain content, as shown in the analysis below.

	-----all countries-----		-----Latin America-----		-----Brazil only -----	
	products	avg % g=wg	products	avg % g=wg	products	avg % g=wg
all categories	9760	77.14%	733	73.08%	147	88.70%
1. Breads, Bagels, Tortillas	2174	64.94%	325	60.90%	35	65.64%
2. Flours, Mixes, Crumbs	737	86.90%	128	97.21%	61	99.28%
3. Grains, Side Dishes	833	93.91%	63	97.36%	42	100.00%
3.3 Pasta	540	88.17%	16	99.00%	9	94.11%
4. Dairy, Beverages	10	89.57%	N/A	N/A	N/A	N/A
5. Breakfast	2832	78.61%	120	72.17%	N/A	N/A
6. Main Dishes	384	66.45%	N/A	N/A	N/A	N/A
7. Snacks, Desserts	2250	76.77%	81	60.54%	N/A	N/A

Analysis of products approved to use the Whole Grain Stamp (based on 9760 products where data are available to assess percent content).

Whole Grain Stamp, Compared to Other Standards

While the Whole Grain Stamp is overall the most established whole grain standard for identifying whole grain foods, there are other standards in use or proposed. In this section, we’ll describe them and compare them to the Whole Grain Stamp.

Standard	Logo?	Definition/Standard	Status
Whole Grain Stamp	yes	Foods bearing the 100% Stamp must have all their grains as whole grains, with a minimum of 16g per serving. Foods bearing the Basic Stamp may contain some refined grains but must have a minimum of 8g of whole grain content per serving.	In use since 2005; now on more than 11,000 products in 55 countries.
Danish Wholegrain Logo	yes	Foods bearing the logo must have a certain percent of whole grain content, which varies by product category, from 50% to 100% of dry matter. Only certain food categories allowed; products must also meet fat, sugar, fiber, sodium requirements.	In use since 2009; on 700 products in Denmark by the end of 2014.
AACCI Characterization of a Whole Grain Food	no	A whole grain food must contain 8 grams or more of whole grain per 30 grams of product.	Proposed in April 2013; not adopted or in use
HealthGrain Forum Definition of a Whole Grain Food	no	A food may be labeled ‘whole grain’ if it is made with ≥ 30% whole grain ingredients by dry weight, and more whole than refined grains. Foods with ≥ 15% whole grain by dry weight can make a statement of whole grain content on their packaging.	In final draft form; not adopted or in use

Pros and Cons of Various Standards

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

Brazil in choosing a standard for whole grain labeling. We would urge you to consider the following criteria, if possible:

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. We highly recommend the [HealthGrain Forum definition](#) of a whole grain for this purpose, as it takes into account additional specifics of standard milling practices, going beyond the basic AACCI definition (all of the bran, germ and endosperm in their original proportions).

2. Set levels that are meaningful but attainable. 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. 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 – can be more effective than an unchanging, nonspecific symbol like the Danish Wholegrain Logo.

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 to reach the specified level. Under the AACCI 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 AACCI standard.

5. Include all types of foods. It's important to choose a standard that will be inclusive of all types of foods. In this area, the AACCI standard has serious limitations for foods like pizza or burritos, where much of the weight of the food is made up of non-grain ingredients. Ready-to-eat foods – like microwaveable cooked oatmeal or brown rice – would also contain so much water weight that they would not qualify, even though their dry equivalents would qualify. The Oldways Whole Grains Council has outlined the serious limitations of the AACCI characterization in a letter to the U.S. FDA, a copy of which is being sent with this document.

Please email us if we can be of any further assistance or provide any additional information.



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