



266 Beacon Street, Suite 1 • Boston, MA 02116 • 617-421-5500 • WholeGrainsCouncil.org

January 16, 2025

Food Standards Australia New Zealand
Level 4
15 Lancaster Place
Majura ACT 2609 Australia

Dear Dr. Sandra Cuthbert and team:

Oldways and its Whole Grains Council would like to thank FSANZ for giving our organization the opportunity to offer feedback on its *Call for information: Nutrition labelling – Health Star Rating and Nutrition Information Panel*. As our organization has been involved in labeling and regulatory standards not only in the United States, but in many other regions and countries, we would like to share our experience and input, in the hope that it's helpful.

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 helps shoppers easily identify products which contain significant amounts of whole grain ingredients.

The Whole Grain Stamp has been used in Australia since 2007, and in New Zealand since 2013. Currently, 46 products have been approved to use the Whole Grain Stamp in Australia and 31 products have been registered in New Zealand. Our Stamp is the most widely adopted whole grain certification globally and is now on more than 12,000 products in 65 countries.

Responding to the Call for Information: Recommending an Enhancement to HSR

We understand FSANZ is not currently considering a full review of the Health Star Rating's algorithm, but that your team may consider potential enhancements as part of this current review process. With that in mind, we strongly encourage FSANZ to incorporate whole grains



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into the algorithm with this next round of changes in order to enhance the public health impact of HSR.

[Research shows](#) that using whole grains, rather than dietary fiber, in nutrient profiling systems helps the resulting front-of-pack labels better align with dietary guidance and helps to improve overall diet quality. [Observational studies](#) show that there is an association between increased whole grain intake and reduced risk of cardiovascular disease even when the results are adjusted for cereal fiber, which suggests that whole grains offer more significant health benefits than dietary fiber alone. Similarly, the American Institute for Cancer Research and the World Cancer Research Fund report that about 3 servings of whole grain foods per day reduces the risk of colorectal cancer by 17%, and that the [evidence for whole grains is stronger than the evidence for fiber alone](#). Therefore whole grains offer a more meaningful marker of nutrition quality in front-of-pack labeling schemes.

[Research published earlier this year](#) shows that the current HSR system “fails to effectively distinguish between refined and whole-grain items and hence [fails to] communicate the benefits of consuming mainly whole grains.” Similar findings have been reported in [other studies](#) as well. Researchers found that modifying the algorithm to include whole grains made the distinction between whole and refined foods much clearer, promoting whole grain products over their refined grain counterparts. The authors explained that this model “would better align with the ADG and of course the body of evidence showing increased whole grain intake is associated with a multitude of health benefits. Such changes in algorithms potentially aid in guiding individuals to increase whole-grain intake in Australia.”

Nutrient profiling systems that include whole grains in their algorithm have been shown to be extremely effective in increasing whole grain intake, compared with those that utilize dietary fiber alone. The Nordic Keyhole Symbol was introduced in Sweden in 1989 and originally included a fiber component, but not a measure of whole grain. In 2009, it was decided that given the significant evidence for the value of whole grains in the diet, whole grains should be added as a criterion of their own in order to encourage higher rates of consumption. A 2015 [Swedish Food Agency study](#) on the impact of the Keyhole on nutrient intake showed that whole grain consumption rose a staggering 754% after introducing whole grain as one of the criteria for displaying the Keyhole symbol on product packaging.

The Dietary Guidelines for Australians explicitly “make recommendations based only on whole foods, such as vegetables and meats, rather than recommendations related to specific food components and individual nutrients.” We urge FSANZ to better align the HSR with these guidelines by tying algorithms to actual foods (like whole grains) rather than relying on nutrients as a stand-in. While fiber is one of the many beneficial components of whole grains, these foods offer more than fiber alone, and different whole grain ingredients vary in their



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specific fiber content. It is more meaningful to use a measure of whole grain content itself than it is to approximate whole grain content via fiber as proxy.

Why Increasing Whole Grain Intake Is a Top Public Health Priority

Decades of nutrition research have clearly demonstrated the link between increased whole grain consumption and reduced risk of many diseases, including cardiovascular disease, stroke, type 2 diabetes, and colorectal cancer. But, despite overwhelming evidence that we should be eating more whole grains, populations around the world struggle to meet recommended levels of intake. The [2019 Global Burden of Diseases Study](#) found that "low intake of whole grains was the leading dietary risk factor for [disability adjusted life years] among men and women and the leading dietary risk factor for mortality among women" ahead of high sodium intake, high trans-fat intake, and high sugar-sweetened-beverage intake. In other words, increasing consumption of beneficial food groups like whole grains is just as important, if not more so, than decreasing consumption of detrimental ingredients such as sodium or added sugar.

More than two thirds of Australian adults [report](#) not meeting the whole grain recommendations outlined in the Australian Dietary Guidelines and there is significant confusion among Australians about which products contain whole grain. About half of Australian adults eat less than one serving of whole grain food per day, which leaves them with an elevated risk for chronic disease.

Researchers in Australia have studied the economic impacts on healthcare costs associated with an increase in whole grain consumption across the population. Increasing national whole grain intake to recommended levels [could save an estimated](#) \$717.4 million AUD in reduced cases of cardiovascular disease, and \$750.7 million AUD on reduced rates of type 2 diabetes. Additionally, researchers found a [potential cost savings](#) of \$405.1 million AUD in reduced rates of cancer overall, and \$37.2 million AUD in reduced rates of colorectal cancer, in particular. These studies offer a compelling argument for the importance of food policies and labeling schemes that promote whole grains for the sake of public health and the economy.

Given the importance of whole grain consumption and the current low levels of intake, there is a clear and significant need for regulatory tools that help nudge consumers toward whole grain options. Modifying the HSR to include whole grains in its algorithm has the potential to notably improve intake levels, while simultaneously creating better alignment with the Australian Dietary Guidelines recommendations and we urge FSANZ to take this opportunity to optimize the impact of its labeling system.

We thank the FSANZ team for the opportunity to share our expertise on whole grain labeling, and we look forward to learning more about how we can best support public health



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improvements through the creation of regulations and guidelines that encourage whole grain intake.

Sincerely,

A handwritten signature in blue ink that reads "Sara Baer-Sinnott".

Sara Baer-Sinnott

President, Oldways

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A handwritten signature in black ink that reads "Kelly LeBlanc".

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A handwritten signature in black ink that reads "Caroline Sluyter".

Caroline Sluyter

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