



# Grains & Legumes Nutrition Council

## Code of Practice for Whole Grain Ingredient Content Claims

### Frequently Asked Questions

#### Key Messages

The purpose of the Grains & Legumes Nutrition Council™ (GLNC) Code of Practice for Whole Grain Ingredient Content Claims (The Code) is to guide clear, consistent messages about whole grain content of foods to assist people to choose and eat whole grain foods to meet the 48 gram whole grain Daily Target Intake (DTI) while also meeting Australian Dietary Guidelines' recommendations for grain foods.

It is not the purpose of The Code to define a whole grain food or a whole grain core food.

The public health benefit can only be fully realised if the claim appears on a large number of grain foods to enable consumers to compare products. Public health benefit comes from encouraging behaviour change as well as through improving the food supply.

GLNC encourages people to swap from grain foods high in saturated fat, salt and sugar to core grain foods. To promote this message a food may only carry the GLNC logo or certification statement if it meets specific nutrient criteria developed to identify healthier food choices (Food Standards Australia New Zealand's (FSANZ) Nutrient Profile Scoring Calculator). This is in addition to any quantification of whole grain which enables the whole grain content claim.

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## Whole Grain Ingredient Content Claim

### Does the Code create a definition of a whole grain food?

It is not the purpose of The Code to define a whole grain food or a whole grain core food. The purpose of The Code is to allow clear, consistent communication of the whole grain content of foods to encourage people to choose and eat whole grain foods. The AACC International characterisation for whole grain food is 8 grams of whole grain per 30 gram serve. Having been established in 2012, The Code is a relatively new initiative. Once The Code has had adequate time to be established as an industry standard, GLNC will consider expanding The Code to incorporate the whole grain characterisation and potentially advocating for incorporation into the ANZ Food Standards Code.

### Does this mean that foods that contain less than 8 grams per serve cannot be called whole grain?

Product names may continue to include the word whole grain even if they contain less than 8g whole grain per serve. According to the current Foods Standards Code, a food sold as whole grain or whole meal need only meet the specification that it has whole grain as an ingredient. As a characterising ingredient the Food Standards Code requires the per cent whole grain be quoted in the ingredient list. However, GLNC would discourage foods containing less than 8g whole grain per serve to use the word whole grain in the name of the product. There are international recommendations suggesting products should contain greater than 50% whole grain before using the word whole grain as a descriptor in the product name.

### Why does The Code use whole grain as two words not one word? Can whole grains (plural) be used?

With the launch of the Code of Practice for Whole Grain Ingredient Content Claims (The Code) GLNC established an industry standard for the use of the word whole grain as two words. Through stakeholder engagement, GLNC decided that it was best for the benefit of multi-national companies that we align with international usage of the term. This aligns with other international standards such as the AACC International (AACCI), who have developed an international characterisation for whole grain. We acknowledge that the Australian Dietary Guidelines and the Food Standards Code use one word and GLNC will be advocating for the adoption of two words when these documents are reviewed.

The GLNC requirement for the use of two words in the content claim does not prevent manufacturers from using whole grain as one word when used elsewhere on pack or in advertising, including the name of the product. However, GLNC does encourage manufacturers to move towards the use of two words to enhance consistency.

Yes, whole grains plural may be used as an alternative to whole grain.

### How should the whole grain content of foods be calculated?

As outlined within the [Code of Practice](#) for Whole Grain Ingredient Content Claims (The Code), GLNC recommends manufacturers calculate whole grain content according to the [Food Standards Code Standard 1.2.10](#) and the Food Standard Australia New Zealand (FSANZ) guidance document [Percentage Labelling of Food User Guide To Standard 1.2.10 – Characterising Ingredients and Components of Food](#). Guidance on the typical ratio fractions in common cereal grains and a list of grains that may be included in the calculation can be found [here](#).

In consultation with the food industry and regulators, GLNC has developed a set of worked examples for the calculation of whole grain content in accordance with Standard 1.2.10 and the User Guide Standard 1.2.10. The worked examples are provided for guidance only and can be access [here](#).

### Why is the calculation of whole grain required? Does this require a Registered User to provide confidential product formulation information?

The calculation of whole grain content is required because there is no established laboratory analysis procedure to determine whole grain content of finished foods with the exception of wheat flour which has been defined by Australian Export Grains Innovation Centre (AEGIC). This calculation provides a proxy for analysis. Additionally, GLNC established a whole grain calculation method to ensure consistency in calculation of whole grain content across the industry.

On signing the Agreement to become a Registered User of The Code, both the Registered User and GLNC agree to be bound by a Non-Disclosure and Confidentiality Agreement.

### Why are Registered Users required to notify GLNC of use of whole grain content claims and DTI statement use even when the GLNC name is not used?

In establishing the Code, GLNC wishes to track the use of the claims on pack by Registered Users to demonstrate the uptake of the voluntary Code by industry.

### Can a whole grain product still claim the percentage whole grain or make other statements about whole grain?

In accordance with changes introduced as a result of The Code review in 2014, factual statements about whole grain ingredient content in grams or as a percentage of the finished food are permitted. The food must contain at least 8 grams of whole grain per manufacturer serve to carry a factual statement about whole grain ingredient content. Examples include but are not limited to:

- 67% whole grain
- Made with 67% whole grain

- 22 grams whole grain per serve
- Made with three different whole grains (X percentage whole grain).

Note: Calculation of whole grain content must be in accordance with The Code (Appendix 2). Whole grain content must be calculated as a percentage of the finished food. Percentage whole grain of total grain content is not permissible.

### Why are manufacturer serve sizes used instead of the serve sizes listed in the Australian Dietary Guidelines?

This is to assist the food industry by aligning with other content claim requirements. For example, to carry nutrient content claims such as 'good source of fibre' foods must contain a minimum amount of fibre per suggested serve size.

The purpose of The Code is to establish clear, consistent communication of the whole grain ingredient content of foods to assist consumers recognise, choose and eat foods that will contribute to their whole grain Daily Target Intake (DTI). Basing the whole grain ingredient content claims on serves that reflect the amount recommended on pack makes the information more accessible to the consumer. Consumer research indicates the portions eaten by Australians are closer to the serve size recommended on pack rather than the serve sizes in the Australian Dietary Guidelines.

GLNC consumer research has indicated that consumers prefer the amount of food to be specified in the explanatory information. For this reason the DTI statement requires manufacturers to state the amount of food rather than use the words 'one serve'.

### Why are the whole grain ingredient content claims based on three levels and not a single whole grain logo as used in other countries?

As part of The Code, GLNC developed three levels of whole grain ingredient content claims:

- Minimum 8 grams of whole grain per serve = "contains whole grain"
- Minimum 16 grams of whole grain per serve = "high in whole grain"
- Minimum 24 grams of whole grain per serve = "very high in whole grain"

The purpose of the three levels is to provide a tool to help Australians understand that whole grain foods contain different levels of whole grain. Consumer research conducted by GLNC indicates the most effective way of conveying this message is using the wording of the claims as stated in the Code together with the Daily Target Intake statement. The whole grain content

levels in the Code align with the levels in the US-based Whole Grain Stamp of 8 grams and 16 grams.

### Does the Code of Practice include a whole grain ingredient content claim or recommendation for infants (7 – 12 months)?

No, the Code of Practice (The Code) does not include a specific whole grain ingredient content claim or recommendation for infants (7 – 12 months).

GLNC recommends the inclusion of some whole grain foods in the diet of infants to promote healthy habits from a young age. While The Code does allow for the use of whole grain ingredient content claims on foods intended to be consumed exclusively or primarily by toddlers 1-3 years old, in consultation with paediatric Accredited Practising Dietitians, GLNC determined that a specific whole grain ingredient content claim or recommendation for infants (7 – 12 months) in The Code of Practice is not appropriate.

This decision is based on the following:

- Infants are highly variable in their development
- Most parents may not be aware of appropriate whole grain portions for infants, so if infants were fed large portions of whole grain containing foods this may result in high fibre intakes which may have detrimental effects.
  - The main risk of high fibre intake for infants (especially insoluble fibre) impaired absorption of iron in their diet which is a greater nutritional priority in this age group.
  - Whole grains may also be satiating, which may displace an infant's subsequent daily intake of breast milk/infant formula or other solids
- Intact whole grains may pose a choking hazard to infants.

### How do The Code's requirements differ for toddler foods?

GLNC encourages the consumption of whole grain foods from a young age to establish healthy eating habits, and developed a Daily Target Intake (DTI) of 24 grams whole grain per day for toddlers aged 1-3 years. However, as the serve sizes of foods designed for the toddler age group are smaller than for adults, it is prohibitive for small serve-size foods to contain 8 grams of whole grain. For example, a 13 gram cereal bar cannot feasibly contain 8 grams of whole grain. Therefore, The Code allows the use of the whole grain ingredient content claims on foods that may contain less than 8 grams of whole grain per serve if these food products are intended to be consumed exclusively or primarily by toddlers 1-3 years old. To carry whole grain ingredient content claims toddler foods must meet specific content criteria listed in the Code and carry the whole grain DTI statement for children 1-3 years.

### How do The Code's requirements differ for children's foods?

GLNC established a Daily Target Intake (DTI) of 32 grams whole grain per day for children 4-8 years. When compared to the equivalent adult guidelines, the level required to make a whole grain claim for children's foods would be 6.7 grams per serve. Given this is not significantly less than 8 grams per serve as is used for adults, it was decided that additional criteria for children would add confusion with no added benefit. In addition, many of these grain foods, such as breakfast cereals or muesli bars, are often eaten by both adults and children.

The Code does not prevent the use of DTI statements for children aged 4 – 8 years. These statements are included in The Code as alternatives to the adult statement.

### Why is the USFDA minimum percentage of 51% whole grain not a requirement of The Code?

During the development of the whole grain ingredient content claims, GLNC held a Round Table consultation with academics working in cereal science, and nutrition and public health experts. It was agreed that 8 grams per serve was an evidence-based and realistic minimum level to describe a food as 'contains whole grain'. On the other hand, there is no evidence on which to base the 51% minimum percentage. The evidence on which the 48 gram Daily Target Intake is based uses a definition of whole grain food that varies in percentage whole grain content.

An audit in 2011 of whole grain foods indicates that a 51% whole grain content criteria would prevent most of the foods currently on the market communicating the information that these foods can contribute towards the 48 gram Daily Target Intake (85% of foods containing between 8 and 16 grams of whole grain per serve would not meet the criteria of 51% whole grain).

In addition, a 51% whole grain content criteria is likely to hamper innovation, particularly in foods with a smaller serve size. If a smaller serve size food is not able to contain 51% whole grain there will be no incentive to encourage development of products with increased whole grain content.

### Are foods required to meet additional nutrient criteria for use of the whole grain ingredient content claim?

In April 2017 GLNC developed Guidelines for Promotion of Grains and Legume Foods, which state:

1. All foods listed as core foods in the Australian Dietary Guidelines may be promoted.
2. Foods not listed as core, predominantly snack foods, must:
  - a. contain at least eight grams of whole grain and/ or two grams of cereal or legume fibre per serve; and
  - b. be eligible to carry a health claim according to the Nutrient Profiling Scoring Criteria of the ANZ Food Standards Code.

Adopting this approach aligns with The Code's purpose; to allow clear, consistent communication of the whole grain content of foods to encourage people to choose and eat healthier whole grain foods.

### **Do Registered Users need to apply The Code on their entire product range or just on the products they register?**

Registered Users are only required to register with GLNC products that will carry the whole grain ingredient content claim or Daily Target Intake statement, not products without a claim or statement. However, GLNC conducts a regular audit of the use of whole grain claims in the food supply and contacts both Registered Users and non-Registered Users making claims on unregistered products to encourage registration. GLNC will also follow up with any Registered Users found to be making whole grain claims on ineligible, unregistered foods, as this would undermine the operation of The Code.

### **As a Registered User of The Code do I need approval to use the whole grain ingredient content claim or Daily Target Intake (DTI) statement on labels?**

Registered Users are required to register with GLNC all products that will carry the whole grain ingredient content claim or DTI statement. This is a one-off notification only and approval from GLNC is not required. The use of the whole grain ingredient content claim or DTI Statement on specific labels or advertising does not require GLNC approval.

## **Governance**

### **How is the nomination and membership of the Steering Committee and Complaints Committee determined?**

GLNC seeks nominations from the food industry and key stakeholders for specific positions on each Committee every two years. Both Registered Users and non-Registered Users are able to nominate. Nominees need to demonstrate capability to meet specified selection criteria and provide details of standing interests. The Committees operate on a majority vote basis so as to remove any effect of conflict of interest. As outlined in The Code, if a conflict of interest is identified during the complaints process the Complaints Committee Member will be removed from the process for the identified complaint.

### **What is the scope and timing of the annual review process?**

The Steering Committee and Code Manager will review the Code every three years in consultation with the food industry and key stakeholders as appropriate.

### Is there a product audit process?

GLNC regularly audits whole grain ingredient content and whole grain claims on grain foods in the food supply. This is conducted category-by-category in a rolling audit process. Manufacturers of products that do not comply with the Code will be made aware of The Code and encouraged by GLNC to remove claims. Manufacturers of products not registered with GLNC are encouraged to become Registered Users. GLNC also uses this data to monitor changes in the use of whole grain claims and whole grain content of the Australian food supply over time.

### What provision does The Code include for new food formats?

GLNC is aware that new food formats may need to be considered when reviewing The Code. Consideration of new food formats will be role of The Code Steering Committee in consultation with the food industry.

### Why are there different allocated times for removal of claims from labels?

The period for removal of whole grain ingredient content claims and GLNC logo &/or certification depends on if the Registered User chooses to withdraw registration of a product from The Code or is required to withdraw due to a breach.

If a Registered User chooses to withdraw the registration of a product, they will be allowed a period of six months following its withdrawal to update its labels to remove all references to The Code, GLNC and its logo, the Certification Mark and other GLNC certification statements. A longer period may be agreed by the Code Manager and the Registered User.

Where the Registered User's participation in The Code has been terminated by GLNC following a breach of The Code by the Registered User, GLNC may determine that reference to GLNC is removed from labels earlier than six months. The length of time will be determined by the severity of the breach. However, the time to remove labels will always be at least one month.

## GLNC Certification Logo

### Why do whole grain foods need to contain at least 8 grams whole grain per manufacturer serve and contain at least 25% whole grain to carry the Certification Logo?

To align with international guidelines proposed by the Whole Grain Initiative, eligible products must contain at least 8 grams of whole grain per serve and contain at least 25% whole grain ingredients.

### How should the whole grain content of foods be calculated?

As outlined within the [Code of Practice](#) for Whole Grain Ingredient Content Claims (The Code), GLNC recommends manufacturers calculate whole grain content according to the [Food Standards Code Standard 1.2.10](#) and the Food Standard Australia New Zealand (FSANZ) guidance document [Percentage Labelling of Food User Guide To Standard 1.2.10 – Characterising Ingredients and Components of Food](#).

The eligibility criteria for the Certification Logo is based on the outcomes of The Whole Grain Initiative (WGI). According to the WGI, whole grain content should be calculated on a dry weight basis, defined as the weight of the food after all water has been removed. While the Certification Logo intends to align with recommendations proposed by the WGI, the calculation of whole grain on a dry weight basis cannot be used in preference to existing labelling requirements in Australia and New Zealand. To align with Food Standards Australia New Zealand and to avoid consumer and manufacturer confusion, grain content will continue to be calculated in accordance with Standard 1.2.10 Clause 3 and 4.

### Why can only core grain foods carry the Certification Logo? How do you define a core grain food?

GLNC's mission is to promote grains and legumes as part of a balanced diet. To support this mission, the message to swap from foods high in saturated fat and salt to core foods underpins all GLNC education campaigns.

In line with this key GLNC message, foods may only carry the Certification Logo if they are core foods as defined by the Australian Bureau of Statistics *2011-12 Australia Health Survey User Guide*. Foods not listed as core, predominately snack foods, must be eligible to carry a health claim according to the Nutrient Profiling Scoring Criteria of the ANZ Food Standards Code.

### Why has the FSANZ Nutrient Profiling Scoring Criteria (NPSC) been chosen to assess eligibility for the Certification Logo?

The Nutrient Profiling Scoring Criterion (NPSC) is designed as a single cut off value to determine if a food can carry a health claim and was deemed an appropriate industry accepted criterion to use when assessing eligibility for the Certification Logo.

### Why does the certification for whole grain foods include the recommendation ‘make at least half your grains whole grain or high fibre’ and not the Australian Dietary Guidelines recommendation of ‘mostly wholegrain and/or high cereal fibre varieties’?

GLNC believes that ‘mostly’ is not an adequate target for consumers. GLNC continues to advocate for a quantified amount of whole grain or high fibre grain food per day in the Australian Dietary Guidelines to provide consumers with a clear goal.

Consumer research indicates that Australians are, on average, eating two serves of whole grain foods per day which is only one third of their total serves of grain each day. So a goal of *at least half* is likely to increase the whole grain and high fibre grain food intake of many Australians. It also leaves room in a balanced diet for refined and lower fibre core grain foods such as white rice and pasta that are culturally important and provide variety.

### Why is the GLNC certification statement ‘Enjoy grain foods 3 – 4 times a day’ and not ‘six serves a day’?

GLNC’s key grain food message is ‘*Enjoy grain foods 3-4 times a day and make at least half your grains whole grain or high fibre*’. This is an interpretation of the Australian Dietary Guidelines recommendation.

GLNC has intentionally not used the six serves a day message.

Consumer research indicates the portions eaten by Australians are larger than the Australian Dietary Guidelines. This may help to explain why research also indicates that Australians perceive the Dietary Guideline recommendation as too many serves. GLNC believes this may be because people interpret this to mean to eat grains on six occasions each day. As a result GLNC developed a grain message that aligns with Australian meal patterns.

Registered Users have the option to use the GNLC logo without the certification statement. They may also use the Australian Dietary Guidelines recommendation in labels without breaching The Code.