

SUBMISSION

Application A464 Definition of the Term 'Wholegrain'

Comments on the Initial Assessment Report

From

The National Heart Foundation of New Zealand

30th of April 2003

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NATIONAL HEART FOUNDATION OF NEW ZEALAND RESPONSE TO A464

SUMMARY

The Heart Foundation encourages the development of a 'wholegrain' definition' that provides consumers with adequate information to make healthy food choices in line with food and nutrition guidelines

The Heart Foundation supports regulatory option 2 - *Accept the application and prepare a draft assessment report to consider amending Standard 2.1.1 Cereal and Cereal products by providing a different definition for "wholegrain"*.

The Heart Foundation supports the 'wholegrain' definition proposed by the applicant, and believes there is value in having international consistency with the American Association of Cereal Chemists. *'Wholegrain' is the intact, dehulled, ground, cracked or flaked grains where the components of the endosperm, germ, and bran are present in substantially the same proportions as they exist in the intact grain.*

The Heart Foundation believes that for maximum benefit, this change to the Code needs to be complemented by further definition and regulation of the use of this term in food labelling and advertising. It would be appropriate to require that foods 'described as 'whole grain' contain a minimum proportion of wholegrain ingredients (such as has been done by the FDA for health claims), and also contain a minimum fibre content and a maximum fat, saturated fat, trans fat and sodium level.

INTRODUCTION

The National Heart Foundation of New Zealand ("the Heart Foundation") welcomes the opportunity to comment on the Initial Assessment Report Application A464 (Definition of 'Wholegrain').

The aims of the Heart Foundation are to promote good health to all New Zealanders, and to reduce the suffering and early death from diseases of the heart and circulation. In order

to achieve this aim the Heart Foundation provides leadership in (1) Individual and population-based health promotion strategies to reduce the underlying causes of heart disease and improve the health outcomes of all New Zealanders; (2) Research and scientific endeavours to increase knowledge about the treatment and prevention of disease of the heart and circulation.

RESPONSE TO A464

The need for a definition of the term 'wholegrain' in standard 2.1.1 Cereal and Cereal products.

Coronary heart disease (CHD) is the leading single cause of death accounting for 23% of deaths (almost 1 in 4 deaths) in New Zealand. 'Wholegrain' consumption has consistently been linked with protection from CHD (1). Anderson showed, in a meta analysis of 12 studies providing appropriate risk ratios for CHD that regular intake of 'wholegrain' foods was associated with 26% reduction in risk of CHD (2). The positive effects of consuming 'wholegrain' foods are higher intakes of dietary fibre, vitamin E, folate, omega 3 fatty acids, oligosaccharides and resistant starch, when compared with refined foods.

The key results from the New Zealand National Nutrition survey 1997 (3) showed that the median intake of dietary fibre was 23g a day for males and 18g a day for females compared with the 25-30g a day recommended by the New Zealand Nutrition taskforce (1991) (4). There was no separate breakdown of 'wholegrain' foods in the survey however it is likely that the low dietary fibre intakes indicate that New Zealanders diets are deficient in 'wholegrains'.

Healthy Eating Healthy Action a background 2003 (5) states that recommendations to increase bread and cereal consumption should emphasise 'wholegrain' breads and cereals, and cereals low in sugar and fat. The Heart Foundation also recommends that the general population choose foods that have a low glycaemic index or that are high in dietary fibre such as some breakfast cereals and 'wholegrain' breads (6). Finally the New Zealand Nutrition Taskforce Report (1991) recommends that New Zealanders increase their intakes of complex carbohydrates and dietary fibre. The report states that one of the key strategies for doing this is for individuals to have at least six servings of 'wholegrain' breads, cereals, or legumes (4).

The Heart Foundation supports the retention of a definition of 'wholegrain' in standard 2.1.1 (Cereal and Cereal products) for two reasons; (1) there is clear reference to the term in national nutrition recommendations and (2) there is strong evidence that 'wholegrains' are protective against a number of diseases, including CHD.

The appropriateness of the term 'wholegrain'

The Heart Foundation agrees with the comments made by the applicant that the current definition of 'wholegrain' needs to be amended.

The Heart Foundation supports widening the current definition of 'wholegrain'. The Food Standards definition means the unmilled products of a single cereal or mixture of cereals and refers to foods made from only intact grains. The Heart Foundation notes that when 'wholegrain' is referred to in public health documents and in recent research showing the benefits of 'wholegrains' it is referring to foods that contain all the components of the grain (the bran, germ, and endosperm), not only the foods made from intact grains.

Chopping, grinding or flaking does not diminish most of the nutritional benefits of 'wholegrains'. The oligosaccharide content, polyphenols, total dietary fibre content, vitamin E and soluble fibre will become more bioavailable or remain unchanged through milling. However it is noted that the breaking down of the intact grain will increase the glycaemic index of grain-based foods. Under the proposed definition it is unclear whether a number of bread and cereal products with a high glycaemic index could be labelled as 'wholegrain'. The Heart Foundation currently recommends that people choose a variety of carbohydrates based foods, and states that foods with a low glycaemic index may provide added health benefits. The Heart Foundation recommends that the glycaemic index be assessed in relation to the labelling requirements for 'wholegrain' claims.

Under standard 2.1.1 any cereal or cereal product can call itself a 'wholegrain' food, or contains 'wholegrains', provided it contains intact 'wholegrains'. Additional labelling requirements are not present elsewhere in the code, meaning that a large range of foods differing immensely in 'wholegrain' content could promote themselves as being 'wholegrain' to consumers. The Heart Foundation supports the development of nutrient claims or additional labelling requirements for a minimum proportion of 'wholegrain'

ingredients. This will allow manufacturers to compete on level playing field when they are promoting 'wholegrain' foods to consumers.

Comments on nutrient claims are beyond the scope of this assessment report however the Heart Foundation notes that the term 'wholegrain' was not considered in P234 nutrient claims. The Heart Foundation believes that developing 'wholegrain' nutrient claims (e.g. a good source of, source of) has value, however does not have a clear view whether the definition of 'wholegrain' is placed within standard 2.1.1 or within Part 1 of the Food Standards Code. The Heart Foundation encourages a minimum fibre content and maximum fat, saturated fat, trans fat and sodium levels for foods making 'wholegrain' claims. Disqualifying statements with respect to dietary fibre content and total fat content have consistency with the United States Food and Drug Administration (FDA) health claim on 'wholegrain's.

Public Health implications arising from amendment of the definition.

Replacing the current definition of 'wholegrain' with the definition proposed by the applicant would enable manufacturers of 'wholegrain' products to market a greater number of 'wholegrain' products to consumers. This will benefit public health by enabling consumers to clearly identify 'wholegrain' products and make healthy food choices in line with food and nutrition guidelines.

Assisting consumers to choose healthier grain based foods is likely to have a public health impact as cereal and cereal-based products (such as bread and breakfast cereals) provide a significant proportion of energy in the New Zealand diet (3). The current definition in standard 2.1.1 means that if labelling requirements were developed for 'wholegrains' that few breakfast cereals and crispbreads and virtually no breads, would be able to promote themselves as 'wholegrain'. The limited number of breads labelled 'wholegrain' is of particular concern given that bread provides the largest proportion of energy in the adult New Zealand diet according to the National Nutrition Survey 1997 (3).

Broadening the definition of 'wholegrain' beyond intact grains, while maintaining consistency with definitions used in health studies, will enable consumers to identify and choose healthier breads, in line with public health educational messages. Currently, many multi-grain breads are less than 20% kibbled or ground whole grains, so introducing a

nutrient claim for 'wholegrain' at a higher level than this will encourage reformulation to 'healthier' grain breads.

CONSISTENCY WITH FSANZ OBJECTIVES

Protection of public health and safety

The proposed 'wholegrain' definition would pose no risk to public health or safety, and will benefit public health by enabling consumers to clearly identify 'wholegrain' products and make healthy food choices in line with food and nutrition guidelines.

Provision of adequate information to enable informed choice

The current provision overly restricts the number of products that can be marketed as 'wholegrain'. The proposed definition would allow manufacturers to be able to market to products with 'wholegrain' benefit to consumers.

Prevention of misleading or deceptive conduct

The term 'wholegrain' is defined in standard 2.1.1 however it is not mentioned elsewhere in the code. The current definition of 'wholegrain' needs to be amended and additional requirements for a minimum 'wholegrain' content also developed. This will ensure that there is a level-playing field for manufacturers to promote their products and to ensure consumers are not misled.

CONSISTENCY WITH INTERNATIONAL DEFINITIONS

The Heart Foundation believes there is value in the definition of 'wholegrain' being consistent with the definition used by the American Association of Cereal Chemists, for international consistency.

CONCLUSION

The Heart Foundation supports regulatory option 2

Accept the application and prepare a draft assessment report to consider amending Standard 2.1.1 Cereal and Cereal products by providing a different definition for "wholegrain".

The Heart Foundation supports the 'wholegrain' definition proposed by the applicant, and believes there is value in having international consistency with the American Association of Cereal Chemists.

'Wholegrain' is the intact, dehulled, ground, cracked or flaked grains where the components of the endosperm, germ, and bran are present in substantially the same proportions as they exist in the intact grain.

References.

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