



Food Policy Working Group

## OPEN LETTER ON THE INCLUSION OF WHOLE GRAIN IN THE PROPOSED HARMONISED MANDATORY FRONT-OF-PACK NUTRITION LABELLING FOR THE EU

Brussels, 29 November 2021

To:

European Commissioner for Health and Food Safety, Ms. Stella Kyriakides  
DG SANTE Deputy Director-General for Food Sustainability, Ms. Claire Bury  
DG SANTE Director for Food and Feed Safety, Innovation, Ms. Sabine Jülicher,  
DG SANTE Head of Unit D1 for the Farm to Fork Strategy, Ms. Alexandra Nikolakopoulou  
DG SANTE Head of Unit E1 for Food Information and Composition, Ms. Sabine Pelsser

The Whole Grain Initiative, joined by the co-signatories of this open letter, would like to bring to the attention of the European Commission some key considerations as part of its commitment to introduce Front-of-Pack Nutrition Labelling (FOPNL) in its landmark Farm to Fork Strategy, which aims to promote a shift to healthy, nutritious and sustainable diets.

In line with the two-fold policy objectives of improving the nutritional quality of consumers' food choices and encouraging food business operators to reformulate products towards healthier options, **the endorsing stakeholders urge the Commission to ensure that whole grains are included into any FOPNL to be proposed and, should the scheme be underpinned by an algorithm, that whole grains be integrated into such a system.**

FOPNL encourages individuals to make informed dietary choices by providing simplified information on the key nutritional characteristics of food products based on scientific criteria. It is important that there is greater alignment between FOPNL systems and evidence-based dietary guidelines, as well as national health and nutrition policies to truly empower people in identifying healthier options. Notably, whole grains are often included in food-based dietary guidelines but often excluded from FOPNL.

The World Health Organization (WHO) recognises FOPNL as an important policy tool for promoting healthy diets and preventing obesity and diet-related non-communicable diseases (NCDs)<sup>1</sup>. Addressing the immense burden of NCDs has become an increasingly pressing priority both globally and in Europe, especially in light of the devastating impact of the COVID-19 pandemic. Tackling lifestyle-related risk factors, including diet, is integral to preventing and reducing premature mortality from NCDs. **There is consistent evidence that regular consumption of whole grains (around three servings per day) is associated with a lower risk of developing NCDs, such as cardiovascular disease, obesity, type 2 diabetes and certain cancers.** Moreover, a recent study also identified that children who consumed more than 1.5 servings of whole grain every day had 40 percent less risk of being obese than children who did not consume whole grain, highlighting the potential of adequate whole grain intake in mitigating risks for childhood obesity<sup>2</sup>. High in fibre, vitamins, minerals and other bioactive compounds such as antioxidants and phytochemicals, whole grains play a major role in healthy diet patterns, as highlighted in several recent meta-analyses<sup>3</sup>.

Despite this evidence, the consumption of whole grains remains alarmingly low in Europe as elsewhere. According to the Global Burden of Disease study, in 2017 low intake of whole grains was the leading dietary risk factor for NCDs in almost all WHO regions, with approximately 3 million deaths and 82

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<sup>1</sup> World Health Organization. (2019) *Guiding principles and framework manual for front-of-pack labelling for promoting healthy diets* <https://apps.who.int/nutrition/publications/policies/guidingprinciples-labelling-promoting-healthydiet/en/index.html>

<sup>2</sup> Choumenkovitch, Silvina F et al. (2013) "Whole grain consumption is inversely associated with BMI Z-score in rural school-aged children." *Public health nutrition* vol. 16,2:212-8. doi:10.1017/S1368980012003527

<sup>3</sup> Aune et al. (2016), *BMJ*, <https://doi.org/10.1136/bmj.i2716> ; Aune et al. (2011), *BMJ*, <https://doi.org/10.1136/bmj.d6617> ; Barrett et al. (2019), *Brit Jour Nut*, <https://doi.org/10.1017/S000711451900031X> ; Bechthold et al. (2019), *Crit Rev Food Sci Nutr*, <https://doi.org/10.1080/10408398.2017.1392288> ; Reynolds et al. (2019), *Lancet*, [http://dx.doi.org/10.1016/S0140-6736\(18\)31809-9](http://dx.doi.org/10.1016/S0140-6736(18)31809-9) ; Schwingshackl et al. (2017), *Amer Jour Clin Nutr*, <https://doi.org/10.3945/ajcn.117.153148>



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million Disability Adjusted Life Years (DALYs) worldwide, In Europe, 664.000 deaths and 14.2 million DALYs were attributed to a diet low in whole grains<sup>4,5</sup>.

To increase whole grain intake, many governments have emphasised whole grains in their food-based dietary guidelines. However, such efforts should be complemented with the provision of clear and consistent guidance on the whole grain content of food products to drive healthier food choices in line with the dietary guidelines<sup>6</sup>, and encourage food manufacturers to include more whole grains in their products. There is evidence in some Scandinavian countries, where whole grain has been successfully integrated in FOPNL schemes, that this has contributed to reversing low whole grain intake levels among the population<sup>7</sup>. Accordingly, the inclusion of whole grains in the EU-wide mandatory FOPNL system, and the nutrient profile models and algorithms underpinning it, may provide an opportunity to further promote whole grain foods and boost whole grain intake levels in the EU.

**The integration of whole grain as a beneficial component into any FOPNL is possible, regardless of the preferred system.** Notable examples include the [Scandinavian Keyhole logo](#) and the [Finnish Heart symbol](#), which include whole grain for the relevant food categories. While scores such as [Nutri-Score](#) do not include whole grain, they do provide precedent for inclusion of other ingredients such as fruit and vegetables (as opposed to nutrients only). In determining what constitutes meaningful whole grain content in a food product, the consensus definitions developed by the international, multi-stakeholder working groups of the Whole Grain Initiative may be useful (please see the definition of Whole Grain as an Ingredient<sup>8</sup> and the definition of a Whole Grain Food<sup>9</sup>). Moreover, recent research has shown that the inclusion of whole grain in the Nutri-Score is feasible and would make the scheme more aligned with dietary guidelines<sup>10</sup>.

We look forward to the introduction of clear and consistent information on the whole grain content of foods across the EU with the new, harmonised FOPNL system, allowing individuals to consciously choose options to attain the optimal levels of whole grain intake associated with health benefits.

The Whole Grain Initiative stands ready to address any questions or provide further information and scientific evidence on the topic as needed.

With kind regards,

A handwritten signature in black ink, appearing to read "Jan de Vries", with a long horizontal line extending from the end of the signature.

Jan de Vries, Whole Grain Initiative Vice Chair

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<sup>4</sup> GBD 2017 Diet Collaborators. (2019) Lancet, *Health effects of dietary risks in 195 countries, 1990–2017: a systematic analysis for the Global Burden of Disease Study* [https://doi.org/10.1016/S0140-6736\(19\)30041-8](https://doi.org/10.1016/S0140-6736(19)30041-8)

<sup>5</sup> GBD Results Tool. <http://ghdx.healthdata.org/gbd-results-tool?params=gbd-api-2017-permalink/045c4276f163ff5df0b6f485da017d26>, accessed 21.06.2021

<sup>6</sup> Drewnowski et al. (2021). Adv Nutr, <https://doi.org/10.1093/advances/nmaa172>

<sup>7</sup> Lourenço, Sofia & Hansen, Gitte & Frank, Per & Stærk, Bente & Petersen, Camilla. (2019). The Whole Grain Partnership—How a Public–Private Partnership Helped Increase Whole Grain Intake in Denmark. Cereal Foods World. 64. 10.1094/CFW-64-3-0027.

<sup>8</sup> <https://www.wholegraininitiative.org/media/attachments/2021/04/14/adapted-2021-03-17-definition-of-whole-grain-as-food-ingredient-proposed-by-global-working-group.pdf>, accessed 18.06.2021

<sup>9</sup> [https://www.wholegraininitiative.org/media/attachments/2021/05/18/whole-grain-food-definition\\_v-2020-11-8\\_incladdininfo.pdf](https://www.wholegraininitiative.org/media/attachments/2021/05/18/whole-grain-food-definition_v-2020-11-8_incladdininfo.pdf), accessed 18.06.2021

<sup>10</sup> Kissock, K.R., Vieux, F., Mathias, K.C. et al. (2021). Aligning nutrient profiling with dietary guidelines: modifying the Nutri-Score algorithm to include whole grains. *Eur J Nutr.* <https://doi.org/10.1007/s00394-021-02718-6>

This letter has been endorsed by



European Cancer  
Patient Coalition

## Member of the Parliament (MEP)

Maria da Graça Carvalho (EPP, Portugal)

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## Organisation

Danish Heart Foundation

Danish Cancer Society

Leipätiedotus ry – The Finnish Bread Information

Italian Association of Cereal Science and Technology (AISTEC)

Swedish Cancer Society

Association of European Cancer Leagues (ECL)

European Cancer Patient Coalition (ECPC)

European Federation of the Associations of Dietitians (EFAD)

European Food Information Council (EUFIC)

European Heart Network (EHN)

European Public Health Alliance (EPHA)

International Diabetes Federation (IDF Europe)

Safe Food Advocacy Europe (SAFE)

European Oncology Nursing Society (EONS)

Società Italiana Per la Prevenzione Cardiovascolare - Italian Society for Cardiovascular Prevention (SIPREC)

Fondazione Dieta Mediterranea - Mediterranean Diet Foundation

International Association for Cereal Science and Technology (ICC)

Unità Prevenzione e Protezione, Consiglio Nazionale delle Ricerche - The National Research Council, Prevention and Protection Unit (CNR)

Centro de Investigación en Alimentación y Desarrollo – Research Center in Food & Development (CIAD)

De Vries Nutrition Solutions

Digestive Cancers Europe (DICE)

Healthgrain Forum

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