



**Grains &  
Legumes  
Nutrition  
Council**

*Cultivating Good Health*

**Grains & Legumes Nutrition Council**

**Submission**

**Draft variation to the Australia New Zealand Food Standards Code  
(Volume 1, Chapters 1 to 5) – Proposal P1025**

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## PREFACE

This submission has been prepared by Grains & Legumes Nutrition Council™ (GLNC), the independent authority on the nutrition and health benefits of grains and legumes. The primary objective of GLNC is to link the Australian grains and legumes industry value chain from grain growers to food manufacturers, providing scientifically-based evidence about the role of grains and legumes in nutrition and health, to develop resources to support health promotion and education.

GLNC members are:

- Grains Research and Development Corporation
- GrainGrowers
- Bakers Delight
- Campbell Arnott's
- CSIRO Food Futures Flagship
- H.J. Heinz Company Australia
- George Weston Foods Baking Division
- Goodman Fielder
- Kellogg Australia
- Nestle / Cereal Partners Worldwide
- Sanitarium Health and Wellbeing Company
- SunRice
- Simplot Australia
- UniGrain
- Ward McKenzie

Associates:

- Australian Food & Grocery Council
- Pulse Australia

## INTRODUCTION

GLNC appreciates the opportunity to respond to the draft variation to the Australia New Zealand Food Standards Code.

GLNC has developed this submission in consultation with its wide contributor base from the grain and legume food industry as well as in consultation with industry associations. GLNC acknowledges the contribution in time and resources from its contributors.

GLNC recognises that clarity and consistency are vital for the effective interpretation and implementation of the Food Standards Code. GLNC supports the policies underlying P1025 and acknowledges the significant amount of work that has gone into reviewing the Code and congratulates Food Standards Australia New Zealand on their efforts to improve the clarity of the Code. However, GLNC considers there are some areas in which the clarity could be improved further. Three specific recommendations to improve clarity and consistency are outlined in this submission. In addition to these recommendations, GLNC fully supports the Australian Food and Grocery Council response to P1025.

## RECOMMENDATIONS

**Recommendation 1:** All references to ‘wholegrain’ are changed to two words to read ‘whole grain’.

### Rationale

- Changing to the use of whole grain as two words will encourage consistency of use of the word on food labels and align with international practices.
- The recent global characterisation of whole grain developed by AACCI uses whole grain as two words.
- Food labelling regulations and food authorities in a number of other jurisdictions use whole grain as two words including the US Food and Drug Administration, Health Canada and the World Health Organisation.<sup>1-3</sup>
- The GLNC Code of Practice for Whole Grain Ingredient Content Claims, the industry standard for the use of whole grain claims in Australia and New Zealand, uses whole grain as two words.<sup>4</sup>

**Recommendation 2:** The definition of whole grain is altered to include additional processes including puffing and extrusion (Section 2.02, page 110). An example is provided below.

***wholegrain** means the intact grain or the dehulled, ground, milled, cracked, flaked, puffed or extruded grain where the constituents—endosperm, germ and bran—are present in such proportions that represent the typical ratio of those fractions occurring in the whole cereal, and includes wholemeal (2.02(2), page 110)*

### Rationale

- The draft includes a change to include formal clauses requiring a food to meet stipulated compositional requirements, such as those defined in whole grain. This may restrict the representation of food formats not specifically listed in the definition.
- The inclusion of the processing techniques of puffing and extrusion would provide additional clarity to the definition of whole grain.
- The absence of the puffed and extruded techniques in the current definition allows the potential for the interpretation that puffed or extruded whole grain products are not able to be sold as whole grain

- Manufacturers have put considerable effort into developing whole grain foods in different food formats that contain all the constituents of the whole grain. This variety in food formats provides consumers with a variety of whole grain products, encouraging increased intake which aligns with public health recommendations.

**Recommendation 3:** All definitions are listed together rather than signposted throughout the document (section 1.06, page2)

#### **Rationale**

- The structure of the draft impacts the effective use of the Code. Multiple signposts within the list of definitions to sections throughout the Code make the document difficult and time consuming to use.
- GLNC is also concerned that the change in structure from discrete Schedules to various locations within Volume 2 may lead to confusion in interpretation.

### **CONCLUDING REMARKS**

GLNC supports the work to improve the clarity and consistency of the Food Standards Code and congratulates FSANZ on their efforts to date. GLNC believes the recommendations in this submission will further improve the consistency of the Code as they are in line with industry best practice.

In reference to section 2.02, GLNC wishes to highlight the difficulty in the new provision providing “enforceability” in relation to the definitions of whole grain and wholemeal foods. While whole grain is defined, whole grain food has not been characterised. In the absence of a quantified characterisation for whole grain food enforceability is limited. GLNC acknowledges that this may be outside the scope of this Code review but recommends FSANZ work towards including a quantified characterisation for whole grain food in the Code. GLNC would like to offer our assistance to FSANZ in this process.

GLNC has established relationships with international groups working on the same characterisation of whole grain food for regulatory purposes and has recently established an industry standard to define the whole grain content required to carry a whole grain ingredient content claim. GLNC looks forward to working with FSANZ towards improving the “enforceability” in relation to the definitions of whole grain and wholemeal foods.

### **REFERENCES**

1. US Food and Drug Administration (2009). *Guidance for Industry: A Food Labeling Guide*. Maryland, USA
2. Health Canada (2006). *Canada’s Food Guide*. Ontario, Canada
3. World Health Organisation (2004). *Global Strategy on Diet, Physical Activity and Health*. ISBN 92 4 159222 2
4. Grains & Legumes Nutrition Council. *Code of Practice for Whole Grain Ingredient Content Claims*. ISBN 978-0-9873026-2-5