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Ministry of Health, Wellbeing and Sports
Attn. Inge Stoelhorst and Judith Hulst
PO Box 20350
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Wageningen, 15 September 2021

Subject: Whole grains as a positive point in Nutri-Score algorithm

Dear Inge Stoelhorst and Judith Hulst,

Nutri-Score, the intended nutrition label in the Netherlands, should make the healthy choice the easier one. However, we are surprised that whole grains are missing in the algorithm underlying Nutri-Score. After all, whole grains are recommended in dietary guidelines worldwide.

Stakeholders are invited to provide input for adjustment of Nutri-Score to improve its alignment with the Dutch dietary guidelines. Therefore I hereby point out to you the reasons for including whole grains as a positive point in the Nutri-Score algorithm.

Whole grains – an important part of a healthy lifestyle

There is consistent evidence that regular consumption of whole grains (about three servings per day) is associated with a lower risk of developing cardiovascular disease, obesity, type 2 diabetes and certain cancers¹. Whole grains are rich in fiber, vitamins, minerals and bioactive compounds such as antioxidants and phytochemicals, making whole grains an important part of healthy diets. In fact, a diet low in whole grains is the most important risk factor for non-communicable diseases².

Dietary Guidelines

That is why dietary guidelines worldwide recommend to include whole grains in the diet. Whole grain products are also prominent in Dutch dietary guidelines: “Eat at least 90 grams of brown bread, whole grain bread or other whole grain products daily” and “replace refined grain products with whole grain products”¹. It is therefore remarkable that whole grains are missing in Nutri-Score, while other healthy ingredients (fruit, vegetables, legumes and nuts) do have a place in the algorithm as positive points. The health benefits of whole grains are no less than that of other healthy ingredients, as the current Nutri-Score implies.

Whole grains in Nutri-Score

Including whole grains as a positive point in Nutri-Score means that the nutrition label is more in line with the Dutch dietary guidelines. The system for calculating the proportion of whole grains in a product can be applied in a similar way as is currently being done for fruit, vegetables, legumes and nuts. Research shows that it is possible in this way³.

¹ Gezondheidsraad. Richtlijnen goede voeding 2015. Den Haag: Gezondheidsraad, 2015; publicatienr. 2015/24.

² 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*

³ Kissock, K.R., Vieux, F., Mathias, K.C., Drewnowski, A., Seal, C.J., Masset, G., Smith, J., Mejbourn, H., McKeown, N.M. & Beck, E.J. *Aligning nutrient profiling with dietary guidelines: modifying the Nutri-Score algorithm to include whole grains (2021). Artikel in voorbereiding.*

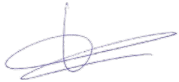
Moreover, the value of whole grains is underestimated by only covering it with the positive fiber points in Nutri-Score. Whole grains do indeed contribute to fiber intake, but other nutrients in whole grains (vitamins, minerals and bioactive compounds) contribute as well to its beneficial health effects.

Promotion of whole grains

Despite all the health benefits of whole grains, consumption is still relatively low. That is why we must seize every opportunity to promote consumption of whole grains. The nutrition label plays an important role in this. In addition, including whole grains in Nutri-Score will encourage food businesses to make product improvements by replacing refined grains with whole grains.

We look forward to the introduction of a strong nutrition label that honors the health values of products with whole grains.

Yours sincerely ,



Mirjam Kortekaas
Managing Director Dutch Bakery Center