

Whole grain labels sow confusion

Published 19 October 2020, with Parke Wilde.

This episode is about food labels. Are you confused about what's in the food you buy? You're not alone.

Parke Wilde: I have a lot of sympathy for consumers, because at different times in history, for different reasons, certain things on the food label have become tightly regulated and very carefully defined, but other things on the food label have a very lackadaisical regulatory environment.

Jeremy: Parke Wilde is a professor who teaches US food policy at the Friedman School of Nutrition Science and Policy at Tufts University in Boston.

He and his colleagues have been looking closely at what consumers can work out from the labels about an important ingredient: whole grains.

The scientific consensus is clear. Whole grains are good for you, and you should try and ensure that at least half of the grain you eat is whole grain. But although there are regulations about what whole grain is, there are no rules about what a whole grain food is. So manufacturers are free to make almost any claim on the package, as long as it isn't actually untrue. As a result, you can find all sorts of wording suggesting that this or that food does in fact deliver the benefits of whole grains.

Parke Wilde: Perhaps the variety that you mentioned is almost too much of a good thing. The labels mean very different things. For example, if you see something that says, "Made with whole grains," it means that there may be at least a little bit of whole grain content in it. It can still be predominantly refined grains. Consumers, in general, are widely misled by labels that say, for example, "Wheat," or by the brown colouring of a particular product, or by the label, "Multi-grain," on it. None of those actually have any official diagnostic ability to tell you that the product really contains whole grains.

Jeremy: I'm not sure whether legislation is the right word, but there's no federal guidance that if it contains this, you can call it that, in the case of whole grains?

Parke Wilde: Well, in fact, the federal guidance that applies is very general and very old. It rules against misbranding your product. If you were to say contains whole grains when it didn't, the current law is quite capable of enforcing a prohibition against that approach. The issue isn't so much outright fibs, it's when it does contain some whole

grain, but it doesn't actually have favourable health properties, that the regulatory issues are a bit more delicate.

Jeremy: Yes, so if it just contains 10% whole grains or something like that, it might not be worth advertising, except possibly to drive sales.

Parke Wilde: That's exactly the issue.

Jeremy: How did you go about investigating this?

Parke Wilde: We used two approaches. One was a side-by-side comparison of hypothetical products. One of the products had a bit more whole grains and a bit less of something else, like salt or sugar. The other product had less whole grain and more of the unwanted nutrient or ingredient. The one that was a little bit less favourable was labelled with a permitted whole grain label. It might say, "Multi-grain," which doesn't necessarily say anything about whole grains, or it might have said, "Contains whole grains," because that's permitted even if there's not very much whole grains in it. We found that a substantial fraction of consumers essentially were guided more by the front-of-pack label that hinted at whole grains, rather than by reading the ingredient list or the nutrition facts panel.

We can be quite sympathetic because the nutrition facts panel doesn't actually tell you explicitly how much whole grains there are.

Jeremy: You asked them to pick which was the healthier based ... Did you tell them what to look at or did you just present them with the front-of-pack label and the nutrition facts panel?

Parke Wilde: That's correct, and the ingredients list. It turns out for whole grains that the ingredients list is in a way the most useful, just because there's the simple rule that the ingredients list has to be presented in decreasing order of contents.

Jeremy: That's interesting. Do people know that? Is that something people generally know, that the first item is the one that there's most of?

Parke Wilde: I can't tell you for sure. This is one of those issues where the first thing is, people who are well informed in the area know more than a lay consumer does, but even experts get confused by whole grains. Whole grains is one of the most challenging issues of the basic diet and health guidance to ascertain for yourself using a food label. For example, in the ingredients list, they will sometimes list flour as the first ingredient and then there will be a parenthesis with a long explanation of what the contents of the flour are. Then close parentheses and then it'll go on. It's actually more challenging than usual to read the ingredients list when you're looking for whole grains content.

Jeremy: You presented a cereal, some crackers and some bread. Was there a difference among the different food classes as to whether people found it easier to judge the healthy one?

Parke Wilde: Basically, I think with bread the challenge was worst of all. The bread had the highest rate of consumer misunderstanding, but we saw a substantial misunderstanding in all three categories.

Jeremy: You've mentioned that people have difficulty. Clearly they show that they can't judge which package contains the healthier food, by your understanding. Can you break down what it is that they find difficult? Is there any way to get at how they assess the accuracy of the labels?

Parke Wilde: This part of the study was done using a discrete choice methodology, where the analyst gets to vary the features of the products and then investigate. There's kind of no limit to what one could in principle investigate using that type of approach. For our study, all we looked at was the trade-offs that consumers were making between the information on the front of the pack that explicitly said something that seemed to be related to whole grains versus the information on the nutrition facts panel and the ingredients list. The downside of that type of discrete choice comparison is that it has to be hypothetical products. We couldn't take actual products and then give wrong information about what that nutrient content was.

To offset that shortcoming, we had the second part of the study, which asked information about consumer understanding of actual food labels. We presented a number of actual products and the actual food labels and asked what was the consumer's understanding of the whole grain content. There too, we found a lot of people overstated the amount of wholegrain content, especially on the products that didn't have much. The problem with that approach is that you can't discern exactly what was the source of misunderstanding.

Your question is, how can you tell what label feature it was that led people to be confused? I can tell from your question that the part of the study that meets that information goal best is the part with the side-by-side comparisons of hypothetical products.

Jeremy: With the real products, they have different forms of label indicating that there may be good whole grains in. You said that people consistently overestimate how much whole grain is in them. What about when you have a product that really is wholegrain? If it really is super wholegrain, do they realize that?

Parke Wilde: No. They can make the error in the opposite direction as well. We had, for example, an oat cereal. A popular brand of oat cereal that really was all whole grains. A substantial

fraction thought there might not ... Consumers know to be on guard. It's just difficult to have your sense of caution applied in a precise way.

Jeremy (narration): In the United States, the main approved Whole Grain label you're likely to see on a product is the Whole Grain stamp. It actually looks a bit like a postage stamp — I'll put pictures in the show notes in case you haven't seen it.

There are actually three stamps. One that tells you that all the grains are whole grains, and that there is at least 18 gm per serving. That's a third of the amount you're supposed to get each day; three of those and you're good to go.

Another stamp tells you that at least half of the grain content is whole grain, and that there is at least half the recommended amount per serving.

And then there's the Basic Stamp, which just tells you that there is a minimum of 8 gm whole grain per serving, and nothing at all about how much of the grain is whole grain.

The Whole Grain stamp was developed by the Whole Grains Council, which is run by the not-for-profit Oldways. And when Parke Wilde and his colleagues' research appeared in Public Health Nutrition, the Whole Grain Council objected to some of the details. But the fact is that the Whole Grain stamp is a voluntary thing. If a manufacturer wants to use the stamp, they have to join the Whole Grains Council and pay an annual fee.

I have to ask, why wouldn't a food manufacturer use the stamp? Maybe because they deliberately want to bamboozle shoppers with a message like “made with whole grains” which tells you very little about how much whole grain and absolutely nothing about the other ingredients.

So you turn to the ingredients list, but that's not much help. It tells you the amount of fibre, and although fibre is certainly one of the benefits of whole grains, it isn't the whole story.

What Parke Wilde would like to see, and maybe Oldways should too, is a bit more stringency about the amount of whole grains, especially for the basic stamp.

Parke Wilde: That's exactly it. I think we're mostly researchers, we're not really policy advisors, but to the extent that I've got any policy advice, it's that the wholegrain implication shouldn't be used on products that don't actually have a whole lot of whole grain. A good standard is that wholegrain claims shouldn't be used on products that are predominantly refined grain. That's a nice, simple threshold. The Oldways whole grain stamps, the best of them are really terrific. For

example, one of the stamps says that the product is 100% wholegrain. That's clearly highly informative to a consumer. Another one of the stamps, and this is for industry voluntary adoption ... A lot of companies will adopt the less stringent whole grain stamp. One of the less stringent ones indicates that the product contains whole grains, and it's a basic stamp. In order to put that label on your product, you have to have had at least eight grams of whole grains per serving. It's not like you can put the Oldways stamp on a product that has no significant whole grains, but the standards are not that high.

Jeremy: Would 51% satisfy you in every case, or is there a simple metric?

Parke Wilde: Oh boy. Sometimes, I almost wish policymakers would ask me and make me powerful on something like that, but I really am quite powerless. Probably, off the top of my head, 51% sounds satisfactory. If a product is predominantly whole grains, it satisfies a slogan that comes from the federal dietary guidance system, which says, "People should be encouraged to make at least half their grains whole." This slogan means, no more than half of your total grain consumption in an ideal diet should be made from refined grains. You talk about a threshold between 50% and 51% and it sounds like splitting hairs. In fact, that's kind of a nice, reasonable threshold.

Jeremy: One of the interesting things is that your study and many, many other studies that I've read, talk about choices and information and the way consumers perceive what they're shown. When you get down to it, in the store, at the checkout line, what's the evidence that labels, front-of-pack labels, nutrition fact panels, what's the evidence that they actually affect people's behaviour in what they choose to buy?

Parke Wilde: Different studies have different tools that they can use. It's possible to do studies in the field where you modify labels and actually investigate, how much does sales change? That generally requires participation from either a manufacturer or a retail partner. I don't know of an exact study like that on the whole grains labels, but there is literature like that on labelling generally. The other thing that can be done is you can use an intermediate setting, like a mock-up of an online food ordering system. I think that that's got a good deal of potential. It's a compromise between the ability as a researcher to modify something that's expensive to change, like a food label. At the same time, it's got more realism than asking consumers hypothetical questions.

Jeremy: I think one of the interesting things that comes out of all of this in all countries that are trying to do something is it takes two to tango.

Government can legislate for different kinds of labels, but at the same time, consumers have to know what those labels mean, and if they wish, make decisions based on what the labels mean. Do you think that there's a balance there, between telling industry what kinds of labels it must adopt and on the other hand, informing consumers of what those labels mean?

Parke Wilde: Definitely. The consumer education part of this is essential. That's true under a completely laissez-faire system where there's not very strict labelling rules because the consumer has to have a buyer beware attitude. It's still true, Jeremy, even if there's a strong labelling regimen. Even with strong labels, consumers still have to have some sense of what the labels mean. The goal is to keep the labelling rules simple enough that we really could imagine explaining them to consumers.

I have a lot of sympathy for consumers, because how could a consumer possibly know which of the claims that they see are strongly defined and which ones are only loosely enforced? Like, the organic label on a food label has a very strict set of criteria that the producer has to follow in order to be declared organic, but natural has a much looser definition. It's a fairly mild standard that the company has to follow, and you can put natural on a very wide variety of products, some of which a reasonable consumer would not think is natural.

Jeremy: What's the future then for getting consumers — I shouldn't be so paternalistic ... What's the future for helping consumers to make choices that are better for their health, given that they're kind of up against an industry that doesn't necessarily have the same goals?

Parke Wilde: I think at present, for example, on whole grains, consumers should have a sceptical attitude. They should be aware, essentially, that the companies are willing to mislead them, and that's a hard thing to say.

On some things in labelling, there's a tradition of thinking of strong labelling rules as being an anti-industry position. The sense is that if you're in favour of public health nutrition rules that strongly enforce strict definitions about what goes on the food label, you must kind of be against the companies. I don't think that's correct. I think over and over again, in the history of US food policy, it has happened that the companies themselves find themselves suffering from a very challenging level of consumer scepticism. When that happens, it's hard for the companies even to market healthy products.

Sometimes it happens that legislation that has stronger consumer protections on labelling passes in a setting where some of the consumer organizations and some of the industry organizations found themselves working together. What brought the industry

organizations to the table is the sense that, “Unless we agree to some of these demands for strict definitions on some of these labelling features, consumers are going to react to such a strong extent that they're going to think we're just lying to them all the time, even though it's not true. “

I think there really is potential for the adults in the room to come up with sensible, reasonably simple definitional provisions that are protective of consumers without being ridiculously patronizing or paternalistic.

Jeremy: Do you have an example of that?

Parke Wilde: I feel like there's lots of examples. They make me sad from time to time.

Labels for what counts as free-range on eggs, for example, are wildly confusing. This is an example of one of the areas of food labelling that's not all that well-defined. A number of years ago, the United Egg Producers and the Humane Society of the United States, so an animal welfare organization, sat down and negotiated reasonable terms for these labels, just what would count as free-range and what would count as humanely raised eggs. The policy never passed Congress because there was too much concern from other major animal industries, such as the pork industry and others that were worried that this was going to set a bad precedent. If the egg producers can reach an agreement with the Humane Society, what are people going to expect from gestation crates for pigs? It seemed like a dangerous precedent. As a result, even though it had an industry consumer organization compromise on the table, we still don't have any rules like that for free-range.

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