

EPA comments on the draft SACN Carbohydrates and Health report

EPA would like to thank the Scientific Advisory Committee on Nutrition for the opportunity to comment on the draft Carbohydrates and Health report. We would like to submit the following suggestions to your kind consideration:

1. Polyols are not sugars

- Table 2.1 of the draft report on page 10 includes an error that was present in the 1998 WHO/FAO report and represents the “polyols” under “sugars”. This error was corrected with the recommendation from FAO/WHO (2003) on page 76 (see Annex 1). In this 2003 recommendation it is stated that *“The term ‘sugar alcohol’ should be phased out of food labelling and replaced with ‘polyol’. Polyols should be recognized as carbohydrates, but not sugars”*.
- Correspondingly in EU Regulation on the provision of food information to consumers (1169/2011) it is also underlined and included in the definitions in ANNEX 1 that “8. ‘sugars’ means all monosaccharides and disaccharides present in food, but excludes polyols”.
- Thus the table needs to be corrected and polyols should appear as separate entry, as proposed in the section highlighted in yellow:

Table 2.1 Chemical classification of carbohydrates (FAO/WHO, 1998) with modification to acknowledge recommendations in FAO/WHO (2003) and to be compatible with food labelling in the UK and Europe.		
Class	Sub-group	Components
Sugars (DP 1-2)	Monosaccharides Disaccharides Sugars-alcohols/ polyols	Glucose, galactose, fructose Sucrose, lactose, maltose Sorbitol, mannitol
Polyols (DP ≥ 1)	Monosaccharide alcohols Disaccharide alcohols Oligosaccharide alcohols	Erythritol, xylitol, sorbitol, isomalt, lactitol, maltitol, mannitol, polyglycitol
Oligosaccharides (DP3-9)	Malto-oligosaccharides Non-digestible oligosaccharides	Maltodextrin Raffinose, stachyose, fructo-oligosaccharides
Polysaccharides (DP>9)	Starch Non-starch polysaccharides	Amylose, amylopectin, modified starches Cellulose, hemicellulose, pectins, hydrocolloids (gums)

- Furthermore, polyols are not always DP 1-2 and can be DP>2, for example polyglycitol and maltitol syrups, thus a DP ≥ 1 is proposed.

2. The term “sugar alcohol” as used in the whole report is not appropriate

- The term “sugar alcohol” as used in the whole report is not appropriate, misleading and archaic. The term that is used in food labels in the UK and Europe and is legally defined in the EU Regulation on the provision of food information to consumers (1169/2011) is “polyols”.
- Thus, we would recommend replacing the term “sugar alcohol” in the report with the term “polyol” throughout the whole report.

3. The benefits of polyols in oral health and in reduction of post-prandial glycaemic response is not mentioned

- We would suggest adding a reference where appropriate (e.g. page 101) to the EFSA opinion on the substantiation of health claims related to the sugar replacers xylitol, sorbitol, mannitol, maltitol, lactitol, isomalt, erythritol, D-tagatose, isomaltulose, sucralose and polydextrose and maintenance of tooth mineralisation by decreasing tooth demineralisation and reduction of post-prandial glycaemic responses.

Brussels, 29 August 2014

Annex 1: FAO Food and Nutrition Paper 77: Food Energy - Methods of Analysis and Conversion Factors.

Annex 2: EFSA opinion on the substantiation of health claims related to the sugar replacers xylitol, sorbitol, mannitol, maltitol, lactitol, isomalt, erythritol, D-tagatose, isomaltulose, sucralose and polydextrose and maintenance of tooth mineralisation by decreasing tooth demineralisation and reduction of post-prandial glycaemic responses.