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Response to consultation on
Draft Scientific Advisory Committee on Nutrition (SACN)
report on carbohydrates and health

Comments

1. UK Health Forum (UKHF) welcomes the publication of the Scientific Advisory Committee on Nutrition (SACN) draft report on carbohydrates and health and the update and clarification it provides in the light of the latest evidence on existing population recommendations, particularly for intakes of dietary fibre and free sugars.
2. UKHF judges the report to be very comprehensive in its consideration of the evidence, and that the approach taken by the committee in its assessment of the evidence appears to be robust. In the interests of transparency, we would welcome a statement in the final report that sets out how the Committee handled studies funded by or conducted by the food industry. This should be routine practice in reviews of this nature and would match the transparency provided by the World Health Organization in its 2014 Guideline.
3. UKHF agrees with the proposed adoption of the term 'free sugars'. We consider that consistent terminology will aid clearer communication and guidance around sugar consumption. The change of terms used will need to be explained and reinforced in communications to relevant professionals and advice provided to the public. This should include explaining the implications of the revised carbohydrate recommendations in terms of foods people should choose to eat. The inclusion of fruit juices in the definition of free sugars may require some adjustment to the existing 5-a-day fruit and vegetable message.
4. UKHF agrees with the proposed revisions to dietary reference intakes – reducing the population average reference value for free sugars to 5% of dietary energy. However, we recommend that the individual average reference value should also be 5% (not 10%, as proposed). This would reduce the scope for confusion among professional groups and the general public in terms of the messaging required to support implementation. Current intakes are high in all age groups and significantly higher in low income groups compared to the general population. This means that the revised recommendations must be accompanied by a robust policy response from Government to ensure that the reductions in intake - and the accompanying health gains - are achieved. This must include positive action to ensure: a) clear food labelling (through wider use of traffic light labelling across the UK market); b) appropriate use of nutrition and health claims; c) restraint on promotions of products high in free sugars, including controls on price promotions and on marketing foods to children and young people; d) government-led standards on acceptable levels of free sugars in products that are major contributors to dietary intakes, and e) urgent exploration of fiscal measures to reduce intakes of free sugars, such as a duty on sugar-sweetened beverages (SSBs).
5. UKHF welcomes the specific recommendation to reduce consumption of SSBs but we suggest that the current statement is strengthened, particularly in view of the impact of SSBs on children's health. We consider the evidence supports a recommendation that 'SSBs should not be given to children', and that the advice to adults is more specific – that consumption of SSBs should be 'generally avoided', rather than 'minimised'.

About the UK Health Forum

The UK Health Forum, a registered charity, is both a UK forum and an international centre for the prevention of non-communicable diseases including coronary heart disease, stroke, cancer, diabetes, chronic kidney disease and dementia through a focus on up-stream measures targeted at the four shared modifiable risk factors of poor nutrition, physical inactivity, tobacco use and alcohol misuse. UKHF

undertakes policy research and advocacy to support action by government, the public sector and commercial operators. The comments in this response do not necessarily reflect the views of all members of the UKHF.