

## **Unilever response to the Scientific Advisory Committee on Nutrition (SACN) consultation on its draft Carbohydrates and Health report**

We welcome the opportunity to provide scientific comment on the Scientific Advisory Committee on Nutrition's (SACN) draft report on carbohydrates and health. It is a thorough review of the evidence and we commend all the work undertaken to produce such a comprehensive report. This will be an extremely valuable report which will provide the scientific basis for the development of sound public health policies and guidance for commercial product formulations.

We broadly support the views of the FDF response but would like to supplement their submission to SACN with our own comments.

Our comments focus on two areas within the report, which are detailed below:

### **Population and individual DRVs**

- The report recommends that the dietary reference value for free sugars be set at a population average of 'around' 5% of dietary energy for all those aged two years and upwards. This is based on the need to limit free sugars intake to no more than 10% total energy intake at an individual level, which is likely to lead to a population average free sugars intake of around 5% of total energy.
- We acknowledge that the evidence derived from multiple adverse outcomes, and that there is quantitative justification for populations to consume <10% energy, based on oral health and energy intake outcomes. However, the evidence and textual context points mainly to evidence for a 10% energy recommended maximum intake of individuals (para 11.10), whereas the basis for setting a specific ≈5% DRV for populations is less clear. The latter is largely taken as a statistical correlate of the former, with limited independent quantitative underpinning.
- **We therefore recommend that SACN sets one recommendation, i.e. a 10% 'upper intake/maximum' level for individuals. We acknowledge that this approach sets a precedent for SACN, however, this recommendation in turn removes the potential confusion in 'dual' targets (population and individuals). Further, it allows for a clear differentiation between DRVs for essential nutrients versus guidance on dietary components such as sugars. In addition, a 10% individual maximum implies a population mean of <<10% [probably around 5-6%], thus reflecting SACN's desired population public health goal. This is without requiring any assumptions regarding shape of the relationships (linear or not) between individual limits and population mean. Thus, the 10% individual limit is scientifically justified, and provides a clear and feasible target for communication, benchmarking and monitoring.**
- Should SACN retain the 5% energy population DRV, further clarification and transparency within the report on the assumptions made to derive this specific value would be appreciated. Also the illustration of the modelling conducted to ascertain if this recommendation is indeed a realistic outcome from the 10% individual maximum.

## Fibre definition

- We broadly support the recommendations on fibre. The recommendations align with most of the evidence base and international guidance, by using AOAC definition of dietary fibre. It includes materials with a degree of polymerisation  $\geq 3$  units, and allows for specific isolated, extracted and synthetic fibres, with the condition that their beneficial physiological effects have been shown.
- Most evidence for benefits of fibres is derived from foods where these are a naturally occurring component of an intact food matrix. The new definition allows greater flexibility to meet recommended levels using isolated, extracted, and synthesized fibres. As the report acknowledges, however, these individual fibres may not provide the full range of established 'fibre' benefits, so their benefits must be demonstrated. Yet specific the same fibres when 'naturally occurring' fibres do not have to carry any specific evidence of their efficacy.
- **We believe that fibres extracted or isolated from foods will be an important vehicle for consumers to meet fibre requirements. Where these share physical and chemical similarity (or identity) to the 'naturally occurring' fibres in food, it may be scientifically unjustified to apply apply more rigorous criteria for their inclusion within the 'fibre' definition, and this may further act against achievement of recommended fibre intakes.**

We hope that SACN will consider our comments.

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