

29 August 2014



SACN
Carbohydrates WG

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Dear Sir or Madam,

The British Retail Consortium (BRC) represents the whole range of retailers including large multiples, department stores and independent shops, selling a wide selection of products through centre of town, out of town, rural and virtual stores. The retail sector employs around 3 million people (11% of the workforce) and retail sales were £303 billion in 2011. The retail sector consists of 284,490 outlets, contributing an estimated 5% to Gross Domestic Product (GVA). The BRC represents just over 80% of the grocery retailing market, a market value worth over £150 billion.

Thank you for giving us the opportunity to comment on the draft report on Carbohydrates and Health. A number of our observations relate to the possible policy actions to be taken as a result of the recommendations in the report, which would be more relevant to Public Health England (PHE); we have therefore copied them in the response.

Our comments do not relate to the science as such but to how the recommendations can be used practically and in relation to existing legislation.

Retailers welcome this thorough review of the scientific evidence on the current knowledge on the biological effects of different carbohydrates on health. We feel it provides objective and independent evidence which can guide future policy and company specific decisions.

The format of the report makes it easy to find the association of a dietary components and risk factors or health outcomes. However it would be helpful to have a summary as a table in the final report.

SUGAR

The report states that to both improve oral health and reduce the risk of weight gain, free sugars should provide no more than 10% of dietary energy. In order for an individual to achieve a recommendation to consume less than 10% of dietary energy from free sugars, the population average needs to be less than this figure. Following a detailed explanation the report recommends the population to lower the consumption of free sugars to around 5% of daily dietary energy intake.

Mathematically a population consumption of 5% cannot be achieved with a maximum individual consumption of 10%. Is the suggestion that the policy recommendation refers to a maximum consumption of 5% to realistically achieve a maximum individual consumption of 10%?

We believe this section should be redrafted in a clearer manner, indicating the association between the individual versus the population recommended value. Clarification is also required on the advice to be used by a company or a health professional when giving nutrition advice to an individual; should this advice be based on the population or the individual maximum consumption of free sugars?

Furthermore the report sometimes refers to 'sugars' and other times to 'free sugars' when referring to free or added sugars. The final report will need to use consistent terminology.

Regulation 1169/2011 on food information to consumers was published in October 2011. This Regulation sets provisions on the type of information and the manner in which this information has to be presented to consumers. Regarding sugar, all the references and values have to relate to total sugars. Prior to the publication of this Regulation most retailers provided a reference to the quantity of added sugar in the product on the front of pack; however this has now been replaced with a reference to total sugars due to the provisions of this Regulation.

Retailers would like to understand how SACN/PHE suggests communicating the recommended maximum intake of free sugars to customers, in the absence of any available information to them on the quantity of free sugars in food products.

FIBRE

The report recommends that dietary fibre is defined as all carbohydrates that are naturally integrated components of foods and that are neither digested nor absorbed in the small intestine and have a degree of polymerisation of three or more monomeric units, plus lignin. Dietary fibre is to be chemically determined using the Association of Official Analytical Chemists (AOAC) method 2009.01 (McCleary et al., 2010; McCleary et al., 2012).

The definition does not include extracted or isolated dietary fibres because at this stage it is not understood whether they would convey the range of health benefits associated with the consumption of dietary fibre rich foods.

We believe there is a contradiction in this definition; the extracted and isolated fibres which are specifically excluded will be picked up with the suggested AOAC methodology, and therefore will be part of the final total fibre value.

The report suggests ruling out the terms soluble and insoluble fibre, as there is a lack of consistent physiological effects, despite the fact that the studies refer to in the report use this classification. Consumers are familiar with this terminology and therefore thought must be given to how to explain this change to consumers.

One of the changes introduced by Regulation 1169/2011 on food information to consumers is that a value for fibre is no longer required to be given as part of the nutrition information panel. While some companies might chose to continue to provide this information voluntarily, it is highly likely that the quantity of information on fibre given to consumers will decrease. Furthermore this Regulation does not provide a Daily Reference Intake for fibre and bans the voluntary use of any Reference Intakes not given in the Regulation.

In addition Regulation 1924/2006 on nutrition and health claims only allows the use of approved nutrition and health claims. The list of approved nutrition claims includes two claims on fibre; 'source of' and 'high in'; however no health claim on the benefits of fibre has been approved. EFSA has stated that fibre is a generic descriptor for a group of substances and therefore the only claims to be assessed are those related to the specific substance.

Without an agreed reference intake for fibre in legislation nor any imperative in the legislation to label fibre content, we are concerned that the recommended DRV for fibre will not be easily communicated. Added to the lack of any agreed claims, SACN's ambition to increase fibre intakes will be severely compromised.

The report identifies the existence of a number of definitions for wholegrain. We believe that within its final report SACN should recommend a definition for wholegrain.

Please do not hesitate to contact me if you want to discuss things further.

Yours sincerely,

Andrea Martinez-Inchausti
Deputy Director Food & Sustainability