

Comments from Dairy UK to the SACN's Draft Carbohydrates and Health Report

Dairy UK is a trade body representing the interests of producer co-operatives, processors, manufacturers and distributors of dairy products within the UK. Between them, Dairy UK's membership collect and process approximately 85% of UK milk production.

We welcome the opportunity to respond to the Scientific Advisory Committee on Nutrition's consultation on the draft Carbohydrates and Health Report.

New definition of "free sugars"

Dairy UK welcomes the change from the definition of "non-milk extrinsic sugars" to that of "free sugars", as it simplifies calculations and is in line with terminology used by the World Health Organisation, making future UK findings comparable to international data.

Because there is no evidence of adverse effects of consumption of intrinsic sugars and those naturally present in milk and dairy products, it is important that these are clearly excluded from the definition of "free sugars". Dairy UK finds that the wording of the report highlights this fundamental distinction in a satisfactory manner.

As assessed by the COMA Panel in 1991, in addition to chemical differences between sugars, physiological effects depend on the physical presentation of the sugars – whether free in solution, or an integral part of the cellular structure of the food. When sugars are consumed as part of the cellular structure of the food, there has been no suggestion of any adverse effects¹. This has been confirmed within the draft WHO report on free sugars released in 2014². The COMA Panel also concluded that there is no evidence that lactose in milk and milk products have adverse effects on health¹.

Furthermore, sugars naturally present in milk and milk products are found in combination with other beneficial nutrients and dairy products are an important source of vitamins and minerals in the British diet³.

New DRV for “free sugars”

Free sugars to contribute 5% of energy intake

In the context of the new proposed intake of free sugars at 5% of energy, Dairy UK believes that clarification is required regarding the distinction between the different foods containing free sugars. Some of these are also nutrient-rich foods which make important contributions to the diet's nutritional adequacy and do not appear to be associated with adverse health outcomes; examples include flavoured milks and sweetened yogurts. These should be clearly distinguished from foods which are nutritionally poor and which provide empty calories.

The recommendation to halve free sugar intake may be potentially harmful if this does not account for the nutritional value of the products it is likely to affect. A portion of the population, especially children, may not like the taste of plain, unflavoured milk or natural yogurt. Flavoured milks and yogurts therefore provide a useful means of boosting the population's vitamin, mineral and protein intake.

For example, a 150g pot of low-fat fruit yogurt is a source of protein, calcium, vitamin B₁₂, riboflavin, potassium, phosphorus, iodine and thiamin. Flavoured milk is a source of protein, riboflavin, potassium, calcium and phosphorus.

It is important to note that a number of studies show that yogurt consumption has a neutral or beneficial effect on weight status^{4,5}. Other studies have shown that consumption of flavoured milk is associated with better overall diet quality without any adverse impact on weight^{6,7,8}.

With regards to oral health, although evidence on consumption of flavoured milk and yogurt is sparse, some research suggests that yogurt may reduce the prevalence of dental caries in children⁹. Milk and milk products contain nutrients that have been shown to have anticariogenic properties, including calcium, phosphate, casein and lipids¹⁰.

At policy level, it will be important to take these differences into account when proposing food recommendations, educating consumers and applying any other measures (e.g. fiscal or restrictions

on advertising). Specifically with regards to educating consumers, it is important that they are provided with clear and straightforward information on the distinction different types of sugar and the difference between products with added sugars which are nutritionally poor and rich.

The replacement of free sugars with intrinsic sugars

With regards to the replacement of free sugars with starches, sugars contained within the cellular structure of food and in milk and milk products, Dairy UK welcomes this proposal as a sensible solution to achieving the carbohydrate recommendation of 50% of energy intake. Specifically with regards to dairy products, an increase in their consumption could result in at-risk groups achieving nutrient intakes which they are currently falling short of. The latest National Diet and Nutrition Survey published in 2014³ found that:

- 14% of 11- to 18-year-olds had calcium intakes below the LRNI;
- 25% of 11- to 18-year-olds, 17% of 19- to 64-year-olds and 14% of over-65s had potassium intakes below the LRNI;
- 15% of 11- to 18-year-olds had iodine intakes below the LRNI;
- 14% of 11- to 18-year-olds had riboflavin intakes below the LRNI.

References

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