



Consultation on the SACN draft report Saturated Fats and Health Report

Comments Form

Organisation:	Agriculture & Horticulture Development Board
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Closing date: 5pm 3 July 2018

General comments	Comments
Overview	<p>Please insert each new comment in a new row</p> <p>AHDB is an evidence based organisation and therefore welcomes this draft report and the clarity it brings to the debate in the medical press and popular media. However, we feel that there needs to be more discussion of SACN's findings in this context, as some aspects of the debate undermine current government recommendations. We feel that to emphasis and clarify needs to be brought to this aspect of the report.</p> <p>The agriculture sector in the UK has a well-established legacy of supporting Government public health policy. Since the 1950's the livestock industry has significantly reduced the fat content of red meat, milk and dairy products on offer to consumers. This has undoubtedly made a major contribution to achieving the population target for total fat reduction to less than 30% of dietary energy. This industry wide effort is often overlooked and in this context it must also have had a significant impact on reducing saturated fat intake. This is not recognised by the evidence presented and indeed data from National, Diet and Nutrition Survey (NSNS) still 'demonises' key food groups which have made a major effort over the years to reduce both total fat and saturated fat content for the publics benefit.</p>
Dietary intakes and sources of fat and saturated fat	<p>Cereals and cereal products (mainly biscuits, buns, cakes, pastries and fruit pies), milk and milk products (mainly cheese and milk), and meat and meat products are the main contributors to saturated fat intakes in all age groups. We believe that this observation has the potential to misinform public health policy and mislead consumers about the potential nutritional benefits that these commodity groups can make to a healthy balanced diet.</p> <p>Currently the nutritional analysis data used as the basis NSNS, is very outdated and does not reflect what is available to the consumer today. In some instance the raw data is almost 30 year old and bears no resemblance to the variety and nutrient content of the wide range of lower fat options now being routinely purchased.</p> <p>To ensure that public health policy is driven by accurate information updated food compositional data is crucial to underpin dietary assessment surveys. These inaccuracies will also be being perpetuated in on pack labelling and recipe analysis. We would therefore challenge the point made in the report that any misreporting of food consumption in the NDNS is likely to due to underreporting. Flawed and outdated raw data does not give a true representation of the positive contribution that red and processed meat and milk and dairy products make to nutrient intake. This includes making a positive contribution to the fatty acid profile of the foods we consume today</p>
Aligning with international perspective	<p>The recent WHO draft report reached the same conclusion as SACN with regard to saturated fats and this is consistent with other world-wide guidelines. This merits further emphasis and discussion especially around the subtler differences that exist.</p>

	<p>Also, worthy of further comment is SACN's decision to recommend a mix of MUFA/PUFA (despite the limited evidence found for MUFA compared to PUFA) whereas WHO recommended only PUFA in its draft report. This might relate to the potential risk of exceeding 10% energy if PUFA were to be the sole substitute but this should be made clear. You will be aware that animal food sources contain a combination of all three groups of fat (SFA, MUFA and PUFA) so for communication purposes it would be helpful to have some clarity.</p>
Individual fatty acids	<p>We appreciate that consideration of individual saturated fatty acids was not within the remit of this review. However, it might be helpful to add some clarification that not all saturated fatty acids have the same effect on blood cholesterol.</p> <p>Some countries have already incorporated recognition of this important consideration into dietary guidelines and we feel that this should be an important consideration for future work. It would be helpful if SACN gave their perspective on the short chain fatty acids (SFA) in dairy products and stearic acid in red meat. In addition, the growing popularity of highly saturated coconut oil emphasizes the need for clarity regarding the health effects of lauric acid.</p> <p>There also needs to be further clarity on trans fatty acid reduction. You will be aware this has in the main focused on reducing those trans fats produced industrially in the hardening of vegetable oils. These oils are very different from those naturally produced in the digestive process of ruminant animals which have been shown to not have the same negative health impact as industrial trans fats and indeed some studies have demonstrated health benefits. This difference needs to be made clear.</p>
Carbohydrate and fibre	<p>The advice on saturated fat and cardiovascular disease (CVD) should be aligned with SACN's recommendations on carbohydrates, fibre and CVD. The lack of studies to suggest that complex CHO is a beneficial substitute for saturated fat from a CVD perspective may be interpreted, in isolation, to mean that complex (high fibre) carbohydrates are not beneficial for health. This has the potential to undermine the message that most of the population need to consume considerably more fibre than at present and undermine SACN's recommendation that about 50% of our energy intake should come from carbohydrates.</p> <p>A more detailed commentary on SCANs position on wholegrains would also be helpful.</p>
Consumer campaign	<p>We support SACN's recommendation that government should give consideration to strategies to reduce population average intake of saturated fats. However, we are concerned that previous campaigns (FSA) have resulted in the public receiving misleading and confusing messaging focusing on the benefits of plant based foods over animal sourced foods.</p> <p>The effectiveness of any campaign needs consider a 'whole diet' approach if it is to gain industry support. Ideally strategies should be developed with input from public health nutritionists with food industry experience. They can relay historical insights and share the technical difficulties likely to be encountered when either reducing or seeking substitutes for saturated fats in key commodity groups.</p>

	<p>Furthermore, given the high profile debate on the role of saturated fat in the diet, and the confusion this seems to have generated, we suggest there needs to be a robust, government backed campaign that aims to clarify the advice re saturated fat for health professionals and the public, correct misinformation and put SACN's recommendations into a practical dietary context.</p> <p>In doing this, it will be important to integrate the findings of SACN on saturated fat with those on carbohydrates (including fibre) and CVD, and in particular to clarify the advice on saturated fat and carbohydrates from a whole diet perspective.</p>
Recommendations section	<p>In general we welcome the recommendations made but feel that some of the points we make above should form part of SACN's work plan going forward. In particular, it would be helpful for SACN to consider the evidence regarding the relative impact of different fatty acids, especially different saturated fatty acids as this potentially has a bearing on food based guidance.</p> <p>Finally, we would welcome if SACN would considered the quality of the raw nutrient analysis for the key commodity groups which according to the NDNS make the greatest contribution to saturated fat intakes. As previously stated, the raw data used for cereals and cereal products, milk and milk products, and meat and meat products is significantly out of date and urgently requires to be updated to ensure true accuracy and representation of the variety of products being consumed today.</p>

Please add extra rows as needed

Comments by paragraph	Comments
	Please insert each new comment in a new row
Pages 31-34	The nomenclature for cis/trans fatty acids (described on page 34) should be cross referenced on pages 31/2 where it first occurs (or be described in full when first mentioned).
Page 50	It is worth clarify the difference between industrial trans fats and those naturally produced.
Page 50, para 6.7	The value from more recent data might add to consistency.
Page 50, para 6.8	Dietary cholesterol is not an issue in general terms so this might merit a comment.
Page 50, para 6.9	Based on what appears in a summary section elsewhere, we suspect the second sentence relates to the NDNS rolling programme period rather than the past 25 years. The widespread use of statins, especially in older men might merit a comment.
Chapter 5/6	It is mentioned that the main sources of saturated fats showed little change over time and that misreporting of food consumption, generally under reporting is known to be a problem in the NDNS. However, it is also identified that a key issue is whether the underestimate of saturated fat intakes applies equally to all sources of saturated fats. Could this be clarified?
Chapter 8	Compared with chapter 9 (lipids), the findings in this section (Chapter 8) are difficult to interpret. The reporting of individual studies and the short summary tables are very helpful, but a little more commentary would help draw the findings together.
Chapter 17	We would suggest that consideration of individual saturated fats needs to be part of a future work stream. In addition, consideration needs to be given to the accuracy of current nutritional composition data and the impact out of date data a may be having on studies and the interpretation of results.

Please add extra rows as needed