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CAOBISCO's Comments to the Draft 6 of working party 1 report : European Diet and Public Health : The continuing challenge

CAOBISCO welcomes the opportunity to comment on the working party 1 report. We consider that important issues have been highlighted in the report and support the new findings on iodine, folic acid in relation to NTD and cardiovascular disease prevention.

Nevertheless and after careful reading of draft 6 of working party 1 report, it seems that some other important issues and areas of major scientific controversy have not been addressed correctly in the report. Indeed several recommendations included in Table 1 concerning sugar, fat and salt are not supported by scientific evidence. CAOBISCO feels that only scientifically based recommendations should be addressed. Well-known scientists support this opinion.

Concerning sugars, FAO/WHO Expert consultations of 1995 (Consultation on Food Based Dietary Guidelines) and of 1998 on Carbohydrates and Human Health have concluded that there is no scientific evidence for a numeric sugar target. Furthermore, for the moment the EU Member States do not have a consistent approach to the definition of free sugar or to guidelines showing that there is no consensus on this issue. CAOBISCO considers that the recommendations made in Table 1 should be based on the most recent scientific literature and consultations. Based on the FAO/WHO Expert Consultations CAOBISCO considers that the limit for free sugar intake should be deleted from Table 1.

Regarding dental health, recent public dental health achievements have demonstrated that there is no direct relation between caries frequency and sugar intake. The decline of caries has occurred even in countries where sugar intake remains the same. The promotion of caries is not solely linked to refined sugars but to all fermentable carbohydrates. The best caries preventive measures, which have been recently underlined by the Chief Dental Officers, are good oral hygiene habits and a moderate consumption frequency of all carbohydrate containing foods and drink.

Concerning the recommendation to limit intake in sugary snacks, in May 1999 at the CAOBISCO Seminar on Nutrition, some well-known scientists and experts, like Prof. Elmadfa, have demonstrated and agreed that confectionery has a role to play in a balanced diet and that CAOBISCO products should be treated like any other food. There is no evidence that these foods contribute disproportionately to the energy intake in the diet, nor do they distort the nutrient balance of the diet. For this reason, CAOBISCO considers that the recommendation of 4 sugary snacks per day is not science-based and not relevant and should be deleted.

Concerning fat intake, CAOBISCO's shares the view of Prof. Gibney that low fat diets are no longer considered to be universally beneficial. All saturated fats do not have a negative effect on health. It has been recognised that stearic acid has a neutral effect on blood cholesterol.

CAOBISCO feels that the recommendations should only refer to cholesterol-raising fats.

Additionally a wider range of fat intake than currently suggested in Table 1 would be appropriate for dietary recommendations provided that energy needs and balance are taken into account.

CAOBISCO supports the comments of the European Federation of Salt Associations submitted recently on salt recommendations. The recommendations should take into account all the multiple sources of sodium in the diet and should not be given as salt only. CAOBISCO considers that other recommendations in relation to prevention of hypertension should be taken into account.

The task of working group 1 is the assessment of science. For this reason, the report should outline and provide more evidence on the consequences if the nutritional goals are not met. The objectives are to identify the nutritional needs and not to argue how these needs could be achieved. It is the task of working group 2 to translate the nutritional needs into food based dietary guidelines.

In conclusion, CAOBISCO feels that any discussion on nutritional requirements has to take into account the dietary diversity of Europe. CAOBISCO considers that only non-controversial science-based nutritional recommendations should be addressed in the report. Many Member States or organisations have elaborated their own guidelines and this diversity is not reflected in Table 1.