

REVIEW OF THE SCOTTISH DIETARY GOALS IN LIGHT OF THE SACN RECOMMENDATIONS ON CARBOHYDRATES AND HEALTH

1 Introduction

FSS has a statutory objective to improve the extent to which members of the public have diets conducive to good health. This paper is the first of three papers relating to nutrition that will be presented to the Board over the next six months. The purpose and timing of future papers is outlined in section 11.

2 Purpose of the paper

- 2.1 The purpose of this paper is to inform the Board of the FSS review of the Scottish Dietary Goals (SDG) in light of the new Scientific Advisory Committee on Nutrition (SACN) recommendations for carbohydrates¹ and to outline the implications to existing dietary policy and consumer messaging. The proposed dietary goals for 2016 are detailed in Annexe A.

The Board is asked to:

- consider and agree the revisions to the current SDGs (paragraph 6.6).
- to advise the Minister for Public Health to approve the proposed revision to the SDGs.

3 Background

- 3.1 In July 2015, the Chair wrote to the Minister for Public Health to advise that the SACN recommendations on Carbohydrates and Health should be accepted. In line with FSS advice, the Minister accepted the recommendations in full and requested that FSS, working with others as necessary, review the SDG and consider the implications for current dietary policy and messaging in light of these new recommendations.

4 Background to the Scottish Dietary Goals (SDG)

- 4.1 The Scottish Government's current SDG² were last revised and published on the Scottish Government website in 2013. They comprise a set of 8 key nutritional parameters, derived from consensus opinion of current science and evidence, relating to diet and health. Together they provide the basis of a healthy balanced diet to reduce diet related conditions including obesity, type II diabetes, cardiovascular disease, cancers and for the improvement of dental health.
- 4.2 The SDG are set at the population level. They are not intended to be a suite of publically facing consumer messages about diet but instead the purpose of the goals is to fix the direction of travel for dietary improvement, underpin Scottish dietary policies and provide a benchmark for monitoring dietary progress.

1

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN_Carbohydrates_and_Health.pdf

2 <http://www.gov.scot/Resource/0042/00421385.pdf>

4.3 The SDG underpin, or are embedded within, the following Scottish Government policies:

- Recipe for Success
- Supporting Healthy Choices
- The Obesity Route Map
- Better Eating Better Learning

4.4 The SDG also underpin a range of key Scottish Government initiatives including the Healthy Living Award and the Healthy Living Programme, as well as the Eat Better Feel Better social marketing campaign. Details of the above policies and initiatives are provided in Annexe B.

4.5 Although not directly underpinned by the SDGs, the Nutritional Requirements for Food and Drink in Schools (Scotland) Regulations, 2008 were based on the consensus of scientific opinion at the time and should therefore also be considered in light of the new SACN recommendations. The regulations can be accessed via the link: <http://www.gov.scot/resource/doc/238187/0065394.pdf>

4.6 Evidence from the FSS dietary surveillance programme shows that, despite considerable policy effort by government, industry and partners, little or no progress towards the current dietary goals for fibre and sugar has been made over the last 15 years.

4.7 FSS will publish a Situation Report on 9 December 2015, which demonstrates the lack of progress in meeting the SDGs, and the nature and scale of the challenge for Scotland in tackling diet related ill-health.

5 Background to dietary messaging

5.1 The eatwell plate has been accepted by all four UK administrations as the primary tool for consumer messaging about a healthy balanced diet. It is widely used by health and education professionals in Scotland. The eatwell plate is currently being updated to encompass the new SACN recommendations.

5.2 It is anticipated that the new eatwell plate will be available for use early in 2016. FSS officials have worked closely with colleagues in Public Health England (PHE) who are leading this work, throughout the development of the new plate by:

- Contributing funding for consumer testing in Scotland.
- Providing examples of dietary modelling to meet the recommendations.
- Representing Scotland as observers on the PHE external reference group which was set up to advise on the development of the new plate.
- Gathering and representing the views of the NHS Health Scotland Public Health Nutrition Network for consideration by PHE and the external reference group.

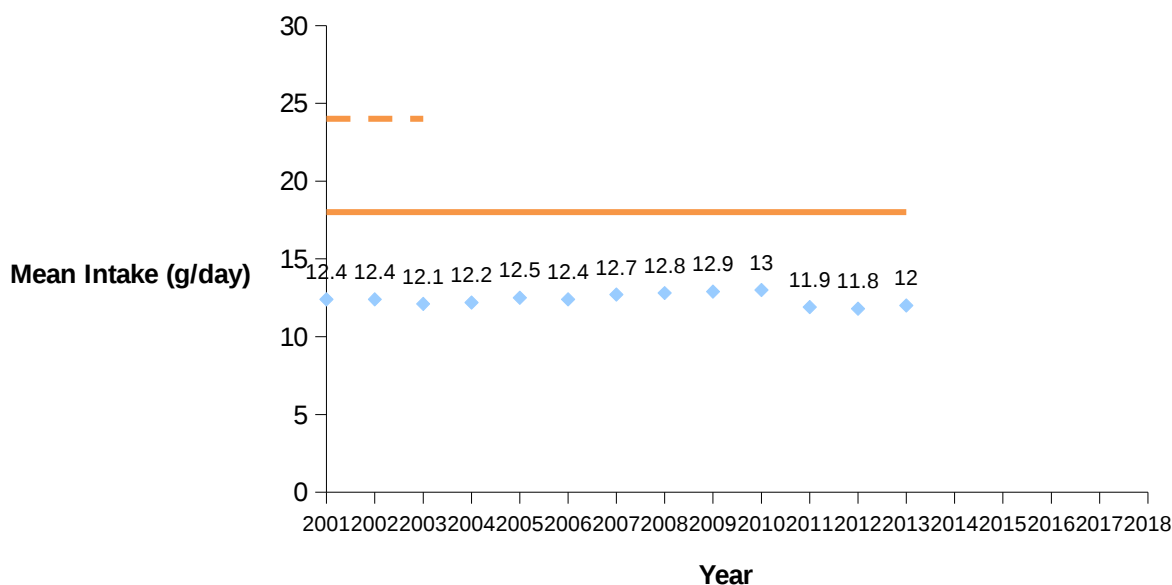
6 Review of the SGD

- 6.1 In preparation for reviewing the SDG, FSS officials obtained the views of SG policy officials across relevant portfolios.
- 6.2 There was agreement that the SDG should be revised to reflect the new SACN recommendations.
- 6.3 The following goals, considered as relevant to the SACN recommendations for carbohydrate, were reviewed: sugar, fibre and fruit and vegetables.
As a result, revised goals for sugar and fibre are recommended. An additional new goal for total carbohydrate has been introduced in recognition of current low intakes of high fibre carbohydrates in the Scottish diet.
- 6.4 A step wise approach to setting the goals for fibre and sugar was considered. However, the proposed goals have been fully aligned with the SACN recommendations to fix the direction of travel and for the purpose of emphasising the challenge ahead.
- 6.5 Consideration was given to the current SDG for fruit and vegetables in light of the free-sugar contribution to the diet from fruit juice, together with recent evidence of relatively low intake of vegetables in the Scottish population compared to the rest of the UK. However on balance it was felt that these issues would be better dealt with via policy actions and consumer messaging and therefore no change to the current goal is proposed.
- 6.6 The current goals for red meat, oily fish, fats and salt were not considered relevant to the SACN carbohydrate recommendations and were therefore not included in this review.
- 6.7 The proposed changes to the SDG will support the achievement of the outcome measures for the SDG for calories, specifically with respect to energy density and the prevalence of overweight and obesity.
- 6.8 Recognition of the significant dietary challenge, together with the inevitably long time scales required to achieve the change towards the proposed new SDGs were fully considered during the review process.
- 6.9 These proposed changes to the SDG are outlined in the table below and the scale of the challenge is highlighted in the graphs below.

Proposed changes to the current SDGs

| Goal | Current | Proposed new goal |
|--------------------|--|--|
| Sugar | Average intake of non-milk extrinsic sugars to reduce to less than 11% of food energy in children and adults | Average intake of free-sugars ³ not to exceed 5% total energy in adults and children over 2 years |
| Fibre | An increase in average consumption of NSP fibre to 18g/day by increasing consumption of wholegrains, pulses and vegetables | Average population intake of AOAC fibre ⁴ for adults (16+) to increase to 30g/day by increasing consumption of wholegrains, pulses and vegetables. Dietary fibre intakes for children to increase in line with SACN recommendations. |
| Total Carbohydrate | n/a | Total carbohydrate to be maintained at an average population intake of approximately 50% of total dietary energy with no more than 5% total energy from sugar. |

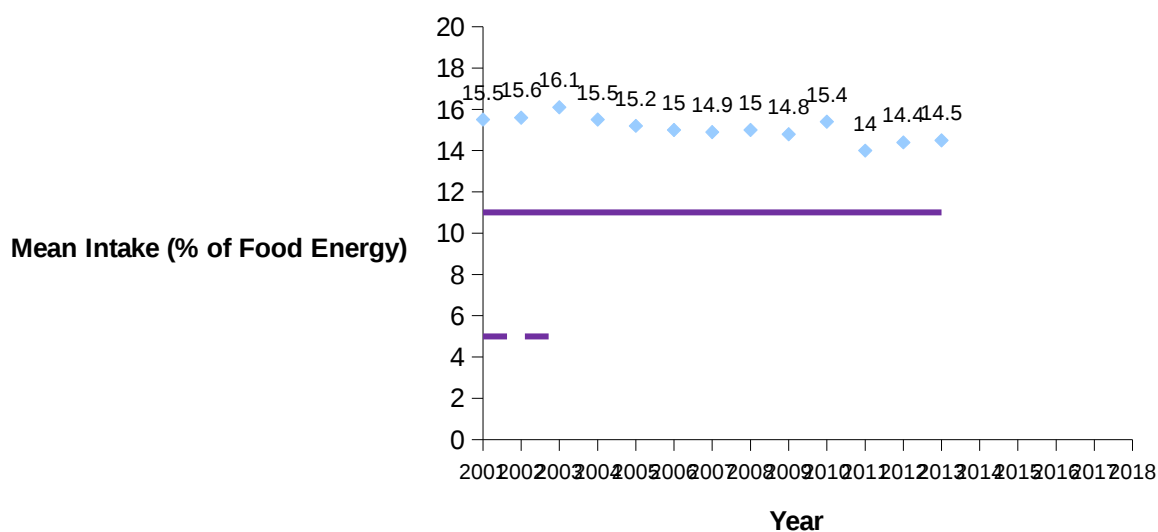
Intake of NSP fibre (g/day), by year



³ Free sugars are all monosaccharides and disaccharides added to foods by the manufacturer, cook or consumer, plus sugars naturally present in honey, syrups and unsweetened fruit juices. Lactose when naturally present in milk and milk products is excluded.

⁴ Dietary fibre as measured using AOAC methodology (the association of analytical communities)

Intake of added sugar (% food energy), by year



7 Implication of changing the SDGs on dietary monitoring and dietary messaging

- 7.1 The SACN recommendations introduce new scientific definitions for sugar and fibre (including new methodologies) and therefore FSS will have to amend its dietary surveillance programme to monitor progress towards the new SDG. Annex C provides a summary of the methodological changes.
- 7.2 The revised eatwell plate will be the front line tool for consumer messaging about a healthy balanced diet. In addition, it is envisaged that FSS will engage with policy makers and the wider stakeholder community to produce comprehensive public-facing dietary guidelines for the Scottish population to fully support the SDG.

8 Implications of the proposed new SDG for diet policy

- 8.1 While there has been considerable focus on sugar since the SACN recommendations were published we should not underestimate the significant challenge also represented by the fibre recommendation. Lack of progress towards reaching the current fibre goal is similar to that of sugar.
- 8.2 The scope and scale of the necessary changes to elicit dietary improvement should not be underestimated. In addressing the challenge, consideration should be given both to existing policies and to the development of new harder hitting policies.
- 8.3 It is recognised that to bridge the gap between current dietary intakes and drive progress towards the new and existing goals, it will be necessary to develop appropriate new policy actions and milestones. FSS officials are keen to work together with SG policy leads to do so.

8.4 For example, Supporting Healthy Choices (SHC), developed jointly by SG and FSS, contains voluntary commitments for both industry and government. These commitments relate to a number of components, recently identified by Public Health England⁵, to be important as part of a successful sugar reduction programme. This includes actions to rebalance retail and out of home promotions, reductions in marketing and advertising of high fat, salt and/or sugar foods and reformulation. Therefore reviewing SHC would provide a suitable platform for new policy development.

9 Potential risks and mitigations

9.1 Progress towards the SDG has remained largely static over the last 15 years. It is therefore important that there is recognition and acceptance, not just by Government, but also by the food industry and the public that the current position must change if Scotland is to realise the vision of becoming a healthier more prosperous nation.

9.2 New policy actions may be developed based on current Scottish, UK, and international evidence and policy approaches. This will include working with other UK administrations, where appropriate, to ensure policies are as effective as possible and that they do not widen the health inequalities gap.

9.3 The scale and nature of the change required to achieve dietary change will require strong and sustained coordination of action across Scotland. To mitigate any potential risk of policy fragmentation, FSS will collaborate with SG colleagues and other partners at a strategic level. Progress towards the SDG will be dependent on effective partnerships between FSS, SG officials and other partners such as those in NHS Health Scotland as well as the wider nutrition workforce.

10 Conclusions

10.1 The revision of the SDG was carried out taking account of the views of SG and FSS policy officials in full knowledge of the scale, complexity and long term nature of the challenge. Given clear evidence that there has been little or no progress towards the current SDG, new drivers for change are essential.

10.2 The new SDG will provide an impetus for driving change, through:
i) revision and strengthening of the existing policies.
ii) developing new policy actions.

11 Next Steps

11.1 FSS will consider and develop advice for potential new policy directions and initiatives, aimed at driving progress towards the full suite of SDG, to reduce the health consequences of poor diet while taking account of health inequalities. An outline of potential new policy directions and initiatives will be presented to the Board for discussion in January, when the Board can determine the advice that it

5 <https://www.gov.uk/government/publications/sugar-reduction-from-evidence-into-action>

wishes to provide to Ministers. This will be followed, by a detailed FSS nutrition implementation framework for the Board to discuss in summer 2016.

11.2 FSS will align its consumer messaging and engagement in Scotland to support the progress towards the SDG, including by:

a) Developing new public facing dietary guidelines for Scotland that will encompass the new eatwell plate and also place dietary advice within a broader context of society and sustainability.

b) Developing and conducting evidence led social marketing.

12 Recommendation

The Board is asked to:

- consider and agree the revisions to the current SDGs (paragraph 6.9)
- to advise the Minister for Public Health to approve the proposed revision to the SDGs.

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Date: 02 December 2015

ANNEXE A - Proposed Dietary goals for 2015

| Dietary goals 2016 | | Basis of recommendations |
|-------------------------------|---|--|
| Calories | A reduction in calorie intake by 120 kcal/person/day | Preventing Overweight and Obesity in Scotland: A Route Map Towards Healthy Weight http://www.scotland.gov.uk/Resource/Doc/302783/0094795.pdf |
| | Average energy density of the diet to be lowered to 125 kcal/100g by reducing intake of high fat and/or sugary products and by replacing with starchy carbohydrates (e.g. bread, pasta, rice and potatoes), fruits and vegetables | Preventing Overweight and Obesity in Scotland: A Route Map Towards Healthy Weight http://www.scotland.gov.uk/Resource/Doc/302783/0094795.pdf |
| Fruit & Vegetables | Average intake of a variety of fruit and vegetables to reach at least 5 portions per person per day (> 400g per day) | http://www.nhs.uk/livewell/5aday/pages/5adayhome.aspx/ Department of Health Nutritional Aspects of the Development of Cancer. Report on health and social subjects 48. London: HMSO, 1998 World Health Organization. Diet, Nutrition and the Prevention of Chronic Diseases. Report of a Joint WHO/FAO Expert Consultation. Technical report series no 916. Geneva: 2003 |
| Oily Fish | Oil rich fish consumption to increase to one portion per person per week (140g) | SACN Advice on fish consumption: benefits and risks. London: TSO, 2004 |
| Red Meat | Limit individual intake of red and processed meat to no more than 90g/day | SACN Iron and Health Report http://www.sacn.gov.uk/pdfs/sacn_iron_and_health_report_web.pdf |
| | Average intake of red and processed meat to be pegged at around 70g per person per day | |
| Fats | Average intake of total fat to reduce to no more than 35% food energy | Department of Health. Dietary Reference Values for Food Energy and Nutrients for the United Kingdom. Report on health and social subjects 41. London: HMSO, 1991 |
| | Average intake in saturated fat to reduce to no more than 11% food energy | Department of Health. Nutritional Aspects of Cardiovascular Disease. Report on health and social subjects 46. London: HMSO, 1994 World Health Organization. Diet, Nutrition and the Prevention of Chronic Diseases. Report of a Joint WHO/FAO Expert Consultation. Technical report series no 916. Geneva: 2003 |

| | | |
|--------------------------------------|---|---|
| Sugar (revised goal) | Average intake of trans fatty acids to remain below 1% food energy | Scientific Advisory Committee on Nutrition. Update on trans fatty acids and health. London: TSO, 2007 |
| | Average intake of free-sugars ⁶ not to exceed 5% total energy in adults and children over 2 years | Scientific Advisory Committee on Nutrition (SACN) report on carbohydrates. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN_Carbohydrates_and_Health.pdf |
| Salt | Average intake of salt to reduce to 6g per day | Scientific Advisory Committee on Nutrition. Salt and Health. London: TSO, 2003 |
| Fibre (revised goal) | Average population intake of dietary fibre ⁷ for adults (16+) to increase to 30g/day by increasing consumption of wholegrains, pulses and vegetables. Dietary fibre intakes for children to increase in line with SACN recommendations. | Scientific Advisory Committee on Nutrition (SACN) report on carbohydrates. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN_Carbohydrates_and_Health.pdf |
| Total Carbohydrate (new goal) | Total carbohydrate to be maintained at an average population intake of approximately 50% of total dietary energy with no more than 5% total energy from sugar. | Scientific Advisory Committee on Nutrition (SACN) report on carbohydrates. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445503/SACN_Carbohydrates_and_Health.pdf |

⁶ Free sugars are all monosaccharides and disaccharides added to foods by the manufacturer, cook or consumer, plus sugars naturally present in honey, syrups and unsweetened fruit juices. Lactose when naturally present in milk and milk products is excluded.

⁷ Dietary fibre as measured using AOAC

ANNEXE B - Description of policies and initiatives affected by the SDG

Recipe for Success – Good Food Nation

Launched in June 2009, Recipe for Success aimed to promote Scotland's sustainable economic growth by ensuring that the Scottish Government's food and drink policies address quality, health and wellbeing, and environmental sustainability, whilst recognising the need for access and affordable healthy food.

<http://www.gov.scot/Resource/Doc/277346/0083283.pdf>

In June 2014, a new phase of Recipe for Success: Scotland's National Food and Drink Policy was launched. Becoming a Good Food Nation highlights the successes of Scotland's first food and drink policy whilst recognising the continuing challenges within Scotland's food and drink sector. It reaffirms the Scottish Government's commitment to promoting the sustainable economic growth of the food and drink industry and also articulates a new aspiration that Scotland should become a Good Food Nation, not only in what is produced but also what we buy, serve and eat. Becoming a Good Food Nation recognises the need to move towards a healthier, resilient and sustainable food system.

<http://www.gov.scot/Publications/2014/11/4615>

Supporting Healthy Choices

Published in June 2014, Supporting Healthy Choices is a joint Scottish Government and FSS framework for engagement with the food industry. The food and drink industry is particularly well placed to influence the choices consumers make and this is reflected in the framework. The food and drink industry and other partners are invited to take specific voluntary action to create a healthier food environment for consumers; one which readily encourages healthier choices and better supports sustained health behaviour change. Commitments include product reformulation, rebalancing promotions, removing confectionery and sugary drinks from tills, improving catering practices, providing healthy meal deal options, providing calorie and nutrition labelling in out of home settings and partnership working on social marketing campaigns.

<http://www.gov.scot/Resource/0045/00454204.pdf>

Better Eating Better Learning

This guidance, published in March 2014, is the work of an expert working group whose remit was to refresh the guidance on school food and food education and build on the progress made since Hungry for Success in 2003. The refreshed guidance is designed to support schools, local authorities, caterers, procurement departments, parents, children and young people to work in partnership to make further improvements in school food and food education. It covers: Food and Health; Food and Learning; School Food and Drink Provision; the Dining Experience; Sustainability through Food; Training and Support; Communication and Engagement.

<http://www.gov.scot/Resource/0044/00445740.pdf>

The Preventing Obesity Route Map

In February 2010, the Scottish Government and the Convention of Scottish Local Authorities (COSLA) launched a long-term obesity prevention strategy entitled [Preventing Overweight and Obesity in Scotland: A Route Map Towards Healthy Weight](#). The 'Route Map' recognises that we cannot expect people to be able to change their behaviour alone as the environment we live in today means that for most people weight gain becomes almost inevitable. Excellent work is already being done

but the Scottish Government are committed to go further to make changes that will transform our living environment.

<http://www.gov.scot/Resource/Doc/302783/0094795.pdf>

Healthyliving Award

The healthyliving award is a national award for the foodservice sector in Scotland. It sets a benchmark for the provision of healthier options for the catering industry and rewards caterers who reduce the amount of fat, salt and sugar in food they provide and make healthy options more easily available. The award criteria are based on the general principles of a healthy balanced diet and have been developed to be in keeping with the Scottish Dietary Goals.

There are currently over 730 award holders in the country serving over 227,000 customers daily. Award holders cover a wide variety of outlets from child nurseries and offshore platforms to restaurants in the public, voluntary and private sectors. All NHS hospital catering sites hold the healthyliving award at the higher Plus level.

<http://www.healthylivingaward.co.uk/index>

Healthy Living Programme

The Scottish Government sponsor the Scottish Grocers Federation (SGF) Healthy Living Programme which works to improve the supply and provision of fresh fruit and veg and healthier food choices in local convenience stores, particularly in low income areas of Scotland. Since the inception of the programme in 2004, the programme has the support of approximately 1,500 retailers which includes independent retailers, Symbol Group members, Buying Group members, Scotmid Co-op, Cash and Carry businesses and fruit & vegetable wholesalers. The programme is currently being extended to include hospital retailers with the purpose of improving the provision of healthier foods and reduce the amount of discretionary foods available on hospital sites.

<http://www.gov.scot/Topics/Health/Healthy-Living/Food-Health/Food-Programmes>

Eat Better Feel Better social marketing campaign.

In June 2015, the Scottish Government launched a social marketing campaign, Eat Better Feel Better, to enable consumers to eat more healthily with a particular focus on families. This campaign has partnered with supermarkets and the convenience sector, as well as stakeholders and community groups from across Scotland's food and health industry, to provide advice and support for families. From practical cooking classes at community groups to special offers on healthy ingredients in-store, the campaign aims to provide advice and practical help. It is supported by a website providing recipes, tips and healthier offers.

<http://www.eatbetterfeelbetter.co.uk/>

ANNEXE C - Methodological changes between the SDG and new SACN recommendations

Sugar

Free sugars versus non-milk extrinsic sugars

The new SACN recommendations are for free sugars, whereas the SDG is for non-milk extrinsic sugars.

| Term | Definition |
|--|--|
| Non- milk extrinsic sugars* - UK 1991 | Sugars not contained within the cellular structure of a UK, 1991 food except lactose in milk and milk products |
| Free-sugars – WHO 2015 | Include monosaccharides and disaccharides added to foods and beverages by the manufacturer, cook or consumer, and sugars naturally present in honey, syrups, fruit juices and fruit juice concentrates |

* The only difference between non-milk extrinsic sugars and free sugars is that non-milk extrinsic sugars includes 50% of the fruit sugars from stewed, dried or canned fruit, but free sugars includes none.

Fibre

Key changes to fibre recommendations

There are differences in the definition for dietary fibre between dietary recommendations from different authorities, this reflects differences in the analytical methods used to measure dietary fibre and the types of fibre that are detected by the method. The current goal for fibre measures non-starch polysaccharides whereas the recommended change to AOAC fibre will include more fibre components (such as resistant starch and non-digestible oligosaccharides or lignin). Fibre values on food packaging refers to AOAC values.