

# SACN draft carbohydrates and health report - scientific consultation

---

*Response from ENSA, European Natural Soyfoods Manufacturers Association, August 2014*

---

ENSA welcomes the opportunity to comment on the draft carbohydrates and health report, which is open for consultation until the September 1<sup>st</sup> 2014.

ENSA would like to highlight its **concerns regarding the exclusion for lactose from milk and milk products in the setting of intake recommendations of sugars. Such an exemption may directly and indirectly lead to misinformation and discrimination for food products which are nutritionally equivalent to milk and milk products, such as soy drinks and other soyfoods.**

The SACN recommends to use the terminology **'free sugars'** which includes all added sugars (mono-and disaccharides) as well as sugars naturally present in honey, syrups and unsweetened fruit juices while **excluding lactose** from milk. The dietary reference value for 'free sugars' is set by the SACN on **5% of dietary energy.**

**All sugars provide the same energy (kcal)** and the body deals with mono-and disaccharides in the same way independent of the source. Therefore, sugars naturally present in milk (lactose) or sugars added to soydrinks are absorbed in the body in a similar way, provide the same energy and should therefore be treated equally in recommendations.

**The daily intake of lactose contributes to 10-13 % of the total sugars intake which is a considerable amount. Excluding lactose from the debate is therefore misleading and denying consumers the right for information.**

**Plain dairy milk naturally contains 5g of lactose per 100ml.** In soy drinks, sugars are added for a consumer-friendly taste. However, even after this addition, soy drinks have a lower sugars content compared to dairy, e.g. **plain calcium-enriched soy drink only contains 2.8 g sugars/100ml.**

From a **nutritional** point of view, there is **no scientifically justifiable reason to treat milk products** which naturally contain sugars (lactose) **differently** from products which contain added sugars, as long as the overall sugars content and the nutritional value is the same.

**Soy drinks are clearly different from sugar-sweetened beverages** since they contain important nutrients such as high quality protein, fats and carbohydrates but also vitamins and minerals. Soy drinks have a nutritional composition which makes them fit perfectly in a healthy balanced diet (please see nutritional comparison in table below).



### Conclusion:

The exemption for milk sugar (lactose) in the SACN recommendation by using the 'free sugars' approach is creating direct and indirect **discriminatory effects** for soy drinks and soyfoods.

Soy drinks, but also soy alternatives to yoghurt and soy desserts, have a **similar nutritional composition** as comparable dairy products. Soy-based foods are used in the same way by consumers and at the same consumption moments as dairy products. Moreover, they have a much lower ecological footprint compared to dairy as much less water and land are used to grow soy crops.

Therefore soy foods and dairy should be **treated equally**. Otherwise, consumers can get the wrong impression that soy foods are less healthy than dairy, whereas the total sugar content is very often lower in soy foods than in dairy products.

Nutritional composition per 100ml						
	Energy	Protein	Fat	Saturated fat	Sugars	Calcium
	kcal	g	g	g	g	mg
<b>Milk</b>						
milk, whole	66	3,3	3,9	2,5	4,5	118
milk, semi-skimmed	46	3,4	1,7	1,1	4,7	120
milk, skimmed	32	3,4	0,2	0,1	4,4	122
<b>Soya drink</b>						
Soydrink,plain sweetened	42	3,5	1,9	0,3	2,8	113
<b>Milk based drinks</b>						
Chocolate milk,whole	78	3,4	1,8	1,1	11,8	118
Chocolate milk, semi-skimmed	72	3	1,5	1	11,4	114
Chocolate milk,skimmed	61	3,2	0,4	0,3	11,2	112
<b>Soya-based drinks</b>						
Soydrink,chocolate	70	3,4	1,8	0,4	10	110
Soydrink,cholcolate light(*)	47	2,3	1,2	0,2	5,8	120
<b>Plain yoghurt</b>						
Plain yoghurt, whole	79	5,7	3	1,7	4,7	200
Plain yoghurt, low fat	56	4,8	1	0,7	7,1	162
<b>Soya plain alternative to yoghurt(*)</b>						
simply plain	50	4	2,3	0,4	2,1	120
Mild and creamy, plain	50	4	2,3	0,4	2,1	120
<b>Yoghurt, fruited</b>						
Whole milk yoghurt , fruit	109	4	3	2	16,6	122
low fat yoghurt , fruit	78	4,2	1,1	0,8	12,7	140
<b>Soya fruited alternative to yoghurt</b>						
Soya fruited alternative to yoghurt	77	3,8	2,2	0,4	10,1	120
sources:The composition of foods -sixth summary edition FSA-UK;Nubel database						
(*)Alpro brand data						

\*\*\*

### **About ENSA**

Established in January 2003, the ENSA represents the interests of Natural Soyfoods Manufacturers in Europe. The term “natural” refers to the production process used by ENSA members to produce food using whole soybeans. Soy food products from ENSA members are produced without any use of GM (genetically modified) material or GM beans.

The ENSA is an association of internationally operating companies, ranging from large corporations to small, family-owned businesses. ENSA gathers 8 members and since its establishment in 2003, ENSA has been raising awareness for the role of soy and a plant-based diet in moving to more sustainable food production and consumption patterns.

For more information about ENSA, please visit [www.ensa-eu.org](http://www.ensa-eu.org) or contact the ENSA Secretariat.

### **ENSA Secretariat**

Neo Building box 7

Rue Montoyer 51

Brussels 1000

Tel:+ 32 2 741 62 15

Fax: + 32 2 737 95 01

Email: [secretariat@ensa-eu.org](mailto:secretariat@ensa-eu.org)

Website: [www.ensa-eu.org](http://www.ensa-eu.org)