



March 31, 2014

World Health Organization

Re: Public consultation on draft WHO Guideline: Sugars intake for adults and children

Dear Colleagues,

The American Society for Nutrition (ASN) appreciates the opportunity to provide public consultation on the draft World Health Organization (WHO) Guideline: Sugars intake for adults and children. Founded in 1928, ASN is a nonprofit scientific society with more than 5,000 members in more than 60 countries working in academia, clinical practice, government and industry. ASN is dedicated to bringing together the world's top nutrition researchers to advance our knowledge and application of nutrition. ASN publishes the leading, peer-reviewed scientific journals in the areas of nutrition science and dietetics, *The American Journal for Clinical Nutrition (AJCN)* and *The Journal of Nutrition (JN)*, and the review journal *Advances in Nutrition*.

ASN applauds the WHO's commitment to the prevention of noncommunicable diseases through nutrition. ASN is appreciative of recommendations to limit intake of free sugars throughout the life-course so as not to exceed daily energy requirements and potentially displace consumption of essential nutrients in the diet. Consumption of excess calories from any source, including sugars or starches, may lead to a diet that exceeds daily energy requirements and could contribute to weight gain. In this respect, communications regarding the WHO recommendations should be clear that the *conditional* recommendation to limit intake of free sugars to less than 5 percent of total energy is based on limited evidence related to dental caries, and is not based on evidence related to weight gain or micronutrient dilution.

Furthermore, ASN has concerns about the evidence review and the practicality of the recommendation to reduce intake of free sugars to below 5 percent of total energy. With regard to the review, ASN is troubled by the quality and weight of the evidence to support the *conditional* recommendation that adults and children further reduce their intake of free sugars to below 5 percent of total energy. For example, it appears that in large part the recommendation to further limit free sugars intake to less than 5 percent of total energy is based on ecological studies in which a linear relationship between sugars intake and dental caries was observed. In particular, the meta-analysis on caries and sugars intake by Moynihan et al<sup>1</sup>, using the GRADE quality assessment process, found

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<sup>1</sup> Moynihan P.J., Kelly S.A. Effect on caries of restricting sugars intake: Systematic review to inform WHO guidelines. *J. Dent. Res.*, 2014, 93(1):8-18 (<http://www.ncbi.nlm.nih.gov/pubmed/24323509>, accessed 14 March 2014).

the quality of the evidence to support a recommendation to limit free sugars intake to less than 5 percent of total energy was “very low”. Also, aspects known to influence dental caries, such as oral hygiene and fluoridation, do not appear to have been taken into account by the Moynihan and Kelly (2014) meta-analysis and other evidence used to support the recommendation. ASN urges the WHO to further investigate the relationship between sugars and dental caries, carefully examining the quality of each relevant study using the findings of the 2010 Institute of Medicine (IOM) report, *Finding What Works in Health Care: Standards for Systematic Reviews*, as a guide.

ASN believes that dietary recommendations should be based on the highest quality science from a strong evidence base. Although the 5 percent recommendation is conditional, it may be lost to the media and consumers that this public health recommendation is conditional and therefore, that there is greater uncertainty regarding the quality of evidence, as well as the balance of benefits versus harms and burdens.

With regard to practicality, ASN urges the WHO to carefully consider the practicality of the *conditional* recommendation given current dietary patterns and the available food supply. For example, currently in the U.S., the food label does not distinguish between added sugars and those naturally occurring in foods making it difficult to monitor intake from added sugars. Other potential adverse consequences, including with regards to overall macronutrient intake balance and micronutrient intake balance, must also be taken into account. The 2002 IOM report, *Dietary Reference Intakes for Energy, Carbohydrate, Fiber, Fat, Fatty Acids, Cholesterol, Protein, and Amino Acids*, illustrates that those individuals who consume 5 to 10 percent of total energy as added sugars have higher micronutrient intakes than those who consume 0 to 5 percent of total energy as added sugars. Dietary recommendations for a global population should take into account the varied nutrient needs and dietary patterns of the world population.

Thank you for your consideration of ASN’s comments. Please contact me at 301.634.7281 or sohlhorst@nutrition.org if ASN may provide further assistance.

Sincerely,  
Sarah D. Ohlhorst, M.S., R.D.  
ASN Director of Government Relations