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Draft

Food-Based Dietary Guidelines¹

Scientific Opinion of the Panel on Dietetic Products, Nutrition and Allergies

(Question No EFSA-Q-2005-015c)

(Agreed on 2 July 2008 for release for public consultation)

PANEL MEMBERS

Jean-Louis Bresson, Albert Flynn, Marina Heinonen, Karin Hulshof, Hannu Korhonen, Pagona Lagiou, Martinus Løvik, Rosangela Marchelli, Ambroise Martin, Bevan Moseley, Andreu Palou, Hildegard Przyrembel, Seppo Salminen, Sean (J.J.) Strain, Stephan Strobel, Inge Tetens, Henk van den Berg, Hendrik van Loveren, and Hans Verhagen.

SUMMARY

The European Commission requested the European Food Safety Authority (EFSA) to provide guidance on the translation of nutrient based dietary advice into guidance, intended for the European population as a whole, on the contribution of different foods or food groups to an overall diet that would help to maintain good health through optimal nutrition (food-based dietary guidelines).

In preparing its scientific advice to the Commission, the Panel on Dietetic Products, Nutrition and Allergies reviewed the reasons and general principles for Food-Based Dietary Guidelines (FBDG), identified relevant scientific information for establishing FBDG for individual countries within the EU and summarised steps for implementation, monitoring and evaluation for individual countries. Recent reviews and papers on FBDG, on Dietary Reference Values and available information on diet-related health problems and dietary patterns in Europe were taken into account. The Panel also used a questionnaire to gather information on already existing FBDG in a number of EU Member States.

FBDG constitute science-based policy recommendations in the form of guidelines for healthy eating. They are primarily intended for consumer information and education, and as such, they should be appropriate for the region or country, culturally acceptable and practical to implement. Moreover, they should be consistent, easily understood and easily memorable.

The development of FBDG consists of the integration of scientific knowledge about nutrients, foods and health in order to identify dietary patterns that facilitate the achievement of desirable food and nutrient intakes.

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32 FBDG should focus on the diet-disease relationships of particular relevance to the specific
33 population. In most EU Member States, overweight and obesity, cardiovascular diseases,
34 cancer, hypertension, dyslipidemia, type 2 diabetes, and osteoporosis can be identified as
35 important diet-related public health issues. However, the prevalence of these conditions varies
36 considerably between countries. A number of nutrients of public health importance for EU
37 populations have been identified, i.e. nutrients for which there is evidence of dietary
38 imbalance that might influence the development of these conditions. These include nutrients
39 that might be consumed to excess, e.g. energy, total fat, saturated and trans fatty acids, sugars
40 and salt, as well as those for which intake might be inadequate, e.g. unsaturated fatty acids,
41 dietary fibre, as well as some vitamins and minerals (such as vitamin D, folate, potassium,
42 calcium, iron, iodine). The occurrence of such nutrient imbalances varies between countries.
43 The differences between EU countries in the prevalence of nutrient imbalances and diet-
44 related public health issues, together with the considerable disparities across countries in
45 dietary habits and traditions, requires that FBDG be established by country or region.

46 The development of FBDG may be carried out using a stepwise approach:

- 47 • *Identification of diet-health relationships* - Evidence on diet-health relationships is
48 available from reviews that are carried out regularly by national and international
49 agencies.
- 50 • *Identification of country specific diet-related problems* - Specific diet-related health
51 patterns, disease and mortality rates, should be reviewed to identify and prioritise
52 nutrition problems of public health significance.
- 53 • *Identification of nutrients of public health importance* - Nutrient imbalances in the
54 population (groups) should be identified by comparing habitual intake from dietary
55 surveys to Dietary Reference Values, and by using anthropometric and available
56 biochemical indicators of nutritional status.
- 57 • *Identification of foods relevant for FBDG* - Food groups that are sources of nutrients
58 of public health importance and foods for which intakes explain differences between
59 groups who do and do not achieve target nutrient recommendations should be
60 identified from observed patterns of dietary intake. Intake of food groups with
61 established relationships to health (e.g. fruit and vegetables) should also be estimated.
- 62 • *Identification of food consumption patterns* - Food consumption patterns in the
63 population that are consistent with achievement of recommended intakes of nutrients
64 should be identified. In addition it is important to identify population characteristics
65 for each pattern. Recommendations for FBDG should be made taking into account
66 specific needs of population groups.
- 67 • *Testing and optimising FBDG* - The coherence and effectiveness of FBDG in meeting
68 nutrient recommendations should be confirmed by modelling of food and nutrient
69 intake data and the FBDG should be adapted appropriately.
- 70 • *Graphical representations of FBDG* - Graphical representations of FBDG may be
71 developed in order to facilitate communication to consumers.

72 To be successful, the process of developing and implementing FBDG should be conducted
73 using a multi-disciplinary approach. The early involvement of stakeholders is recommended
74 to promote the acceptance of the outcome.

75 It is recommended that FBDG should be consistent with other public policies that have an
76 impact on food availability and be integrated with other policies related to health promotion.

77 Once established, FBDG should be implemented and their impact monitored and evaluated.

78 **Key words:** Food-Based Dietary Guidelines, foods, nutrients, health relationship, food
79 consumption pattern, food policy

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119 **BACKGROUND AS PROVIDED BY EC**

120 The scientific advice on nutrient intakes is important as the basis of Community action in the
121 field of nutrition, for example such advice has in the past been used as the basis of nutrition
122 labelling. The Scientific Committee for Food (SCF) report on nutrient and energy intakes for
123 the European Community dates from 1993. There is a need to review and if necessary to update
124 these earlier recommendations to ensure that the Community action in the area of nutrition is
125 underpinned by the latest scientific advice.

126 In 1993, the SCF adopted an opinion on the nutrient and energy intakes for the European
127 Community². The report provided reference intakes for energy, certain macronutrients and
128 micronutrients, but it did not include certain substances of physiological importance, for
129 example dietary fibre.

130 Since then new scientific data have become available for some of the nutrients, and scientific
131 advisory bodies in many EU member states and in the US have reported on recommended
132 dietary intakes. For a number of nutrients these newly established (national) recommendations
133 differ from the reference intakes in the SCF (1993) report. Although there is considerable
134 consensus between these newly derived (national) recommendations, differing opinions remain
135 on some of the recommendations. Therefore, there is a need to review the existing EU
136 reference intakes in the light of new scientific evidence, and taking into account the more
137 recently reported national recommendations. There is also a need to include dietary
138 components that were not covered in the SCF opinion of 1993, such as dietary fibre, and to
139 consider whether it might be appropriate to establish reference intakes for other (essential)
140 substances with a physiological effect.

141 In this context the EFSA is requested to consider the existing population reference intakes for
142 energy, micro- and macronutrients and certain other dietary components, to review and
143 complete the SCF recommendations, in the light of new evidence, and in addition advise on a
144 population reference intake for dietary fibre.

145 For communication of nutrition and healthy eating messages to the public it is generally more
146 appropriate to express recommendations for the intake of individual nutrients or substances in
147 food-based terms. In this context the EFSA is asked to provide assistance on the translation of
148 nutrient based recommendations for a healthy diet into food based recommendations intended
149 for the population as a whole.

150 **TERMS OF REFERENCE AS PROVIDED BY EC**

151 In accordance with Article 29 (1)(a) and Article 31 of Regulation (EC) No. 178/2002, the
152 Commission requests EFSA to review the existing advice of the Scientific Committee for Food
153 on population reference intakes for energy, nutrients and other substances with a nutritional or
154 physiological effect in the context of a balanced diet which, when part of an overall healthy
155 lifestyle, contribute to good health through optimal nutrition.

156 In the first instance the EFSA is asked to provide advice on energy, macronutrients and dietary
157 fibre. Specifically advice is requested on the following dietary components:

² Scientific Committee for Food, Nutrient and energy intakes for the European Community, Reports of the Scientific Committee for Food 31st series, Office for Official Publication of the European Communities, Luxembourg, 1993.

- 158 • Carbohydrates, including sugars;
159 • Fats, including saturated fatty acids, poly-unsaturated fatty acids and mono-
160 unsaturated fatty acids, *trans* fatty acids;
161 • Protein;
162 • Dietary fibre³.

163 Following on from the first part of the task, the EFSA is asked to advise on population
164 reference intakes of micronutrients in the diet and, if considered appropriate, other essential
165 substances with a nutritional or physiological effect in the context of a balanced diet which,
166 when part of an overall healthy lifestyle, contribute to good health through optimal nutrition.

167 Finally, the EFSA is asked to provide guidance on the translation of nutrient based dietary
168 advice into guidance, intended for the European population as a whole, on the contribution of
169 different foods or categories of foods to an overall diet that would help to maintain good health
170 through optimal nutrition (food-based dietary guidelines).

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175 Inge Tetens and Henk van den Berg.

176 **ASSESSMENT**

177 **1. Introduction**

178 Poor diet and a sedentary lifestyle account for a major part of the morbidity and mortality that
179 exist throughout the world. The International Conference on Nutrition (ICN) organised by the
180 United Nations Food and Agricultural Organisation (FAO) and the World Health Organisation
181 (WHO) in 1992, identified and encouraged strategies to improve nutritional well-being and
182 food consumption throughout the world. The plan of action, adopted by the ICN, includes
183 among its strategies ‘promoting appropriate diets and healthy lifestyles’ and calls upon
184 governments ‘on the basis of energy and nutrient recommendations, to provide advice to the
185 public by disseminating, through the use of mass media and other appropriate means,
186 qualitative and/or quantitative dietary guidelines relevant for different age groups and lifestyles
187 and appropriate for the country’s population’ (FAO, 1992).

188 In pursuance of these goals and strategies, in 1995 WHO and FAO jointly convened an Expert
189 Consultation on the ‘Preparation and use of food-based dietary guidelines’ where
190 recommendations for the development and use of food-based dietary guidelines (FBDG) were
191 formulated and discussed. According to this consultation, FBDG should be based on current
192 dietary practices and prevailing public health problems, rather than on nutrient requirements
193 and recommended intake levels alone. Such guidelines represent the form in which advice is

³ There is no harmonised definition of dietary fibre at the European Community level.

At the international level the recent meeting of the Codex Committee on Nutrition and Foods for Special Dietary Uses made a recommendation for the definition of dietary fibre for nutrition labelling purposes but a definition has not yet been adopted.

(see Alinorm 05/28/26 Appendix III - <http://www.codexalimentarius.net/web/reports.jsp?lang=en>)

194 provided to people to assist them in selecting a diet to meet their needs for health (WHO,
195 1998).

196 FBDG are described by the WHO as “the expression of the principles of nutrition education
197 mostly as foods”. Since FBDG are intended to provide nutrition education and dietary guidance
198 for individual members of the general public, they need to be formulated in such a way as to
199 make them a truly practical means of assisting people to reach appropriate nutritional goals.
200 Where they cannot be expressed as foods they have to be written in ordinary language,
201 avoiding as far as possible the technical terms of nutritional science (WHO, 1998). Presently, a
202 number of countries in and outside Europe have developed FBDG (e.g. USDA, 2005; SNO,
203 2005; OptimiX, 2005; WHO, 2003a).

204 According to the request of the Commission (EFSA-Q-2005-015), EFSA is evaluating the 1993
205 SCF opinion on population reference intakes for nutrients and certain other dietary
206 components. New opinions on Dietary Reference Values (DRV) are being established. As
207 people think of and eat food rather than its components, nutrient based recommendations need
208 to be translated into FBDG to be adopted by the population. The present opinion aims to give
209 guidance on the process of developing FBDG for the European population.

210 The Panel adopted the following approach:

- 211 • To review the reasons and general principles for FBDG (section 2 and 3)
- 212 • To identify relevant scientific information for establishing FBDG for individual
213 countries within the EU (section 4)
- 214 • To summarise steps suggested for implementation, monitoring and evaluation for
215 individual countries (section 5)

216 For this purpose the Panel has considered:

- 217 • recent reviews and papers on FBDG (WHO, 1998; Williams *et al.*, 1999; Ferro Luzzi *et al.*,
218 2001; Kafatos *et al.*, 2001; ILSI, 2004; King, 2007; Walter and Elmadfa, 2007)
- 219 • recent reviews and reports prepared by EFSA (2006a), the Institute of Medicine (IoM
220 1997, 1998, 2000, 2002, 2003a, 2003b, 2005), WHO (1998; 2003a); USDA (USDA,
221 2005) and available information on diet-related health problems and dietary patterns in
222 Europe (WHO, 2003b; 2006; WCRF, 2007)
- 223 • the results of a recent scientific colloquium, discussing the state-of-the-art of scientific
224 approaches and the advantages and limitations of various approaches for the
225 development of FBDG (EFSA, 2006b)
- 226 • information from questionnaires on existing FBDG in EU countries. To get information
227 on already existing FBDG, Network Members of EFSA’s Data Collection and Exposure
228 Unit or experts of the EFSA Working Group on Population Reference Intake (PRI)
229 were asked to provide names and affiliation of persons in charge of developing FBDG
230 in their country. A computerized questionnaire was sent by EFSA to the competent
231 person identified in 20 of 25 EU countries. Questions were related to the presence of
232 FBDG, origin, target groups, information used in setting FBDG, and other issues as
233 selected food groups, other health related messages, way of presentation etc. (see
234 section 6 and annex 1)

235 **2. Rationale for FBDG**

236 In all European countries, there are public health issues related to diet and some unfavourable
237 trends in food consumption patterns. Benefits could be expected from the improvement of food
238 consumption patterns for well-being, long-term health of individuals and populations and thus
239 for health costs savings. FBDG is one of the tools used to help reach these goals.

240 Reasons for developing and using FBDG, in addition to the development of dietary reference
241 values for nutrients, include (WHO, 1998):

- 242 • Foods make up diets; foods are more than just collections of nutrients.
- 243 • Nutrients interact differently, depending on the food matrix
- 244 • Methods of food processing, preparation and cooking influence the nutritional value of
245 foods.
- 246 • Specific dietary patterns are associated with reduced risk of specific diseases; the
247 protective effect could be due to a single nutrient, a combination of foods or non-
248 nutrients, or the replacements of some other foods in the diet.
- 249 • Some food components may have beneficial biological functions but the exact
250 mechanisms and compounds have not been completely identified.
- 251 • Foods and diets have cultural, ethnic, social and family aspects that individual nutrients
252 themselves do not have.

253 FBDG are primarily intended for consumer information and education, but their effectiveness
254 would require that they should be also taken into account by policymakers, healthcare
255 providers, nutritionists, and nutrition educators in designing and implementing nutrition-related
256 programmes, nutrition education, and information programmes to help consumers in planning
257 an overall healthful diet. As such, FBDG should be an essential component of diet-related
258 health policies, since it is a tool to identify and design specific action plans aiming to facilitate
259 their implementation and full success.

260 **3. General principles for establishing FBDG**

261 FBDG constitute science-based policy recommendations in the form of guidelines for healthy
262 eating. The development of FBDG consists of the integration of knowledge regarding
263 individual nutrients, food components and foods into guidelines for a pattern of eating.

264 FBDG need to be based on sound scientific principles. Epidemiological and experimental
265 research provides evidence that specific diseases and conditions linked to poor diet include
266 cardiovascular disease, hypertension, dyslipidemia, type 2 diabetes, overweight and obesity,
267 osteoporosis, constipation, diverticular disease, iron deficiency anemia, dental caries and
268 malnutrition.

269 Food consumption patterns vary across Europe. As an example, figures 1 and 2 illustrate
270 differences between the availability of 10 major food groups in Portugal and France and the
271 average availability for consumption in Western countries in 1992
272 (<http://museum.agropolis.fr:80/pages/expos/banquet/modele.htm>).

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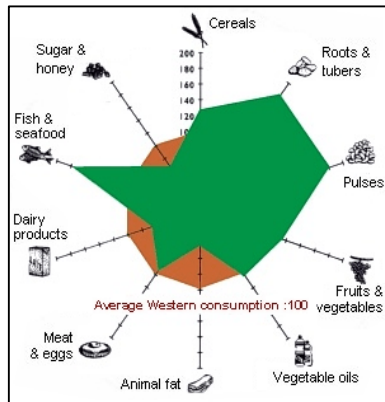
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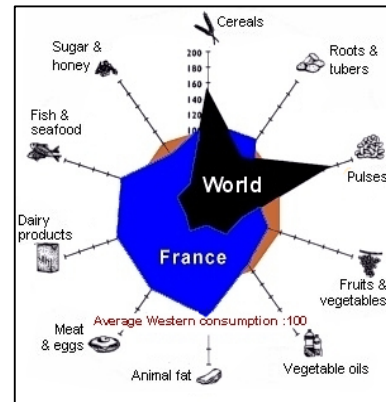
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282 Figure 1 **The Portuguese food**
283 **consumption pattern¹**



284 Figure 2 **The French food consumption**
285 **pattern¹**

286 ¹ Average availability of various food groups by country are expressed as the deviation (%) from the overall availability; the circle corresponds with the average availability in Western countries (=100%)

287

288 The Portuguese food consumption pattern is characterised by a high availability of plant foods
289 and fish and a relatively low availability of animal fat and animal food products. The French
290 pattern is characterised by a high availability of animal products. Recently, Slimani *et al.*
291 (2002) described the diversity in dietary patterns existing across centres/regions participating in
292 the European Prospective Investigation into Cancer and Nutrition (EPIC), based on 24-hour
293 dietary recalls among nearly 36 000 men and women, aged 35-74 years.

293

294 Although there is a trend to a general convergence of European diets and lifestyles there are
295 still important differences between Member States of the EU (WHO, 2003c). In addition,
296 depending on many factors including dietary habits, diet-related health issues also vary across
297 Europe, though the hierarchy of the disease burden is more comparable. Thus, FBDG have to
298 be based directly upon the diet and disease relationships that are particularly important to the
299 individual country. The development of European FBDG has been proposed in the WHO-
300 Europe in the Countrywide Integrated Non-communicable Disease Intervention (CINDI)
301 Project (WHO, 2000; 2003a). However, these FBDG would be very general and only related to
302 a number of basic food groups and, if not adapted to the country-specific situation, culture and
303 habits, would be expected to have a low effectiveness.

303

304 The scientific process underpinning the development of FBDG should follow the generally
305 accepted rules of scientific excellence, transparency and independence, in order to merit the
306 confidence of consumers in the final result.

306

307 The initial design and final formulation of FBDG, as well as their implementation should
308 involve all stakeholders (from consumer organisations to industry organisations, including
309 representatives of different public authorities responsible for areas such as agriculture, health,
310 industry) and scientists. The early involvement of stakeholders in the process would favour the
311 acceptance and effectiveness of the final result.

311

312 Once established and implemented, the impact of FBDG should be monitored and evaluated. In
313 this evaluation, cost effectiveness of the actions based on FBDG should be carefully analysed
(Brunner *et al.*, 2001).

314 In addition, to make FBDG meaningful to the general public they should relate to the social,
315 economic, agricultural and environmental factors affecting food availability and eating patterns
316 for the given country or region, be practical to implement and should recognise that health
317 relates to more than one dietary pattern (WHO, 1998).

318 Moreover, FBDG should be comprehensible, short, simple, clear and easily memorable. In the
319 implementation stage attention should be given to the translation into messages and slogans,
320 and to communicating FBDG information effectively to the public. Bodies responsible for
321 developing FBDG are encouraged to integrate the FBDG-messages with other policies related
322 to health promotion.

323 **4. Scientific process in setting FBDG**

324 In the process of developing FBDG the following steps, adapted and extended from previous
325 reports (WHO, 1998; USDA, 2005; SNO, 2005; OptimiX, 2005) may be considered. These
326 scientific steps follow a logical order, although they can be also iterative, moving back and
327 forth between the different steps. Ideally, all these steps should be followed in order to
328 establish appropriate country-specific guidelines. However, depending on human and financial
329 resources as well as availability and nature of country-specific data, the implementation of all
330 these steps is not necessarily required to develop country specific FBDG, and this will be
331 underlined in the corresponding sections.

332 **4.1. Identification of diet-health relationships**

333 There is evidence that, for a number of nutrients and food groups, a dietary imbalance can
334 increase the risk of obesity and diet-related diseases (e.g. cardiovascular disease, cancer,
335 diabetes mellitus, osteoporosis and dental disease) that are of importance for public health in
336 the EU.

337 For example, in 2003, the WHO/FAO published a report which includes a summary of current
338 scientific knowledge concerning the relationships between dietary factors and the most
339 common diet-related chronic diseases world wide (WHO, 2003b). The WHO/FAO expert
340 consultation has classified the strength of evidence of these relationships as convincing
341 evidence, probable evidence, possible evidence and insufficient evidence.

342 Reviews of the evidence on diet-health relationships are regularly carried out at an international
343 level, using highly qualified international collective expertise. These result in reports that can
344 be conveniently used at a country level, avoiding duplication of effort (e.g. WHO, WCRF,
345 IOTF, EFSA). National reports from other countries including such reviews can also be used,
346 where appropriate (e.g. IoM). All these reports provide relevant and recent information that can
347 be sufficient in many cases to move to the next steps. Some specific health issues are not
348 always taken into account in general reports addressing major and worldwide health issues
349 such as cancer, cardiovascular diseases or obesity and completion of these existing reviews
350 could be required to address specific diet-health relationships for some countries.

351 The public health importance of many nutrients and foods for European populations has also
352 been identified in science based nutrient intake recommendations and food based dietary
353 guidelines from national and international agencies (e.g. Nordic Nutrition Recommendations
354 (Becker *et al.* 2004); Health Council of The Netherlands, 2006; Eurodiet report, 2000; WHO,
355 2006). For a number of nutrients and foods (total fat, saturated, unsaturated and trans fatty
356 acids, protein, carbohydrates, sugars, dietary fibre, salt, fruit and vegetables), population intake
357 goals that have been established in a number of Member States are generally consistent (but not
358 uniform), and aimed at the prevention of major diet-related public health problems in Europe.

359 A summary of the health relationships for a number of nutrients and foods is presented below.
360 As underlined in the following section (4.3), this information is relevant for European countries
361 and could form the starting point to establish FBDG.

362 **Energy balance** - The main sources of energy in food are carbohydrates and fats, with a small
363 contribution made by proteins and possibly by alcohol. In healthy people, the energy intake
364 should be in balance with energy expenditure. Consuming diets of high energy density can
365 undermine normal appetite regulation leading to increased overall energy intake through
366 'passive over-consumption' of food and can lead to weight gain, particularly for those with a
367 sedentary lifestyle (WHO, 2003; IoM, 2005).

368 **Total fat** - Diets high in fat generally have a high energy density, can contribute to excessive
369 energy intake and energy imbalance and thus might promote weight gain. However, no causal
370 relationship has been established between total fat intake and obesity or chronic disease risk
371 (IoM, 2005).

372 **Fatty acid pattern** - Diets high in saturated fatty acids (SFA) increase serum LDL-cholesterol
373 and diets high in trans fatty acids (TFA) increase LDL-cholesterol, reduce HDL-cholesterol
374 and increase the total cholesterol to HDL-cholesterol ratio, all of which has been associated
375 with an increased risk of cardiovascular diseases. In contrast, diets high in mono- and poly-
376 unsaturated fatty acids (MUFA and PUFA, respectively) and long chain omega-3 PUFA (n-3
377 LCPUFA) from fish and fish oils (eicosapentaenoic acid (EPA) and docosahexaenoic acid
378 (DHA) may reduce the risk of cardiovascular disease (IoM, 2005; EFSA, 2004; EFSA, 2005a).

379 **Fruit and vegetables** - Numerous ecological and prospective studies have shown a significant
380 association of a high consumption of fruits and vegetables with a decrease in the risk of
381 obesity, coronary heart disease and stroke (Eurodiet, 2000; WHO, 2003b). Fruit and vegetables
382 are important low-energy density foods and at the same time important sources of dietary fibre,
383 minerals (potassium and magnesium) and vitamins (C, folate).

384 **Dietary fibre** - High dietary fibre consumption is related to optimal bowel function and
385 reduction of cardiovascular disease risk. An adequate dietary fibre intake is also associated
386 with weight maintenance and sustained weight reduction in overweight subjects, because of its
387 satiating effect (WHO, 2003b; van Dam and Seidell, 2007; IoM, 2005).

388 **Sugars** - Increased risk of dental caries in children is associated with frequent consumption
389 (more than about 4 times daily) of cariogenic sugars (mainly sucrose, glucose, and fructose)
390 rather than with the total amount of dietary sugars; the evidence indicates that frequent
391 consumption of sweets and confectionery products and sugar-containing drinks may increase
392 caries risk (Moynihan and Petersen, 2004; DoH, 1991; IoM, 2005) especially when
393 prophylactic measures, e.g. oral hygiene and fluoride prophylaxis, are insufficient. The
394 evidence relating high intake of sugars (mainly as added sugars), compared to high intakes of
395 starch, to weight gain is inconsistent (IoM, 2005; van Dam and Seidell, 2007). However, there
396 is some evidence that sugar-sweetened beverages do not induce satiety to the same extent as
397 solid forms of carbohydrate, and that high intakes of sugars in the form of sugar-sweetened
398 beverages might contribute to weight gain (van Dam and Seidell, 2007; Mann *et al.*, 2007).
399 Although there is some evidence that high intakes of added sugars, particularly from low
400 nutrient density foods, may be associated with a decrease in the nutrient density of the diet due
401 to displacement of nutrient rich foods (van Dam and Seidell, 2007), a systematic review
402 concluded that the evidence for an association of micronutrient dilution with added sugar
403 intake is limited and inconsistent (Rennie and Livingstone, 2007).

404 **Vitamins and minerals** - For men and women older than 50-60 years there is convincing

405 evidence that a sufficient intake of *calcium* and *vitamin D* together reduce the risk of
406 osteoporosis (WHO, 2003). Adequate dietary intake of *potassium* helps to maintain lower
407 blood pressure levels and to reduce the adverse effects of high sodium intake on blood
408 pressure; fruit and vegetables are important sources of potassium (IoM, 2004; WHO, 2003b).
409 The major adverse effect of high dietary *sodium* intake is elevated blood pressure; high blood
410 pressure is an acknowledged risk factor for ischaemic heart disease, stroke and renal disease
411 (IoM, 2004; EFSA, 2005b). Iron deficiency anaemia has detrimental health implications,
412 particularly for mothers and young children and there is evidence of low intake and status for
413 iron in young children and in women of child-bearing age in some EU countries (Elmadfa and
414 Weichselbaum, 2005; WHO, 2002). Low maternal folate intake in early pregnancy is a causal
415 factor for neural tube defects in infants and many EU countries recommend that women
416 planning a pregnancy should supplement their diet with 400µg/day of folic acid (SACN, 2006).
417 Iodine deficiency, of mild to moderate severity, which is an important determinant of foetal and
418 child development, is recognised in a number of EU Member States. National salt iodisation
419 programmes have been implemented in some EU countries to address this problem (WHO,
420 2002).

421 **Alcohol** - A high alcohol intake is associated with an increased risk for osteoporosis in older
422 people and for hypertension. It is also a risk factor for cancers of oral cavity, pharynx, larynx,
423 oesophagus, liver and breast. On the other hand, there is some evidence that low to moderate
424 alcohol consumption lowers the risk of coronary heart disease compared with abstainers, with
425 particular benefits in men aged over 55 years and post-menopausal women (Foster and Marriot,
426 2006).

427 *In setting FBDG for individual countries it is important:*

- 428 • *to collect all the recent international and national expert reviews on diet-health*
429 *relationships ;*
- 430 • *to complete the review if additional country-specific health and dietary issues have to*
431 *be considered.*

432 **4.2. Identification of country-specific diet-related health problems**

433 This step aims to identify country-specific diet-related health issues and helps to prioritise the
434 different problems. Analysis of country-specific health statistics forms the basis of this step. A
435 comparison with statistics of other Member States is a valuable help in identifying the health
436 issues which could be improved by implementation of FBDG.

437 Analyses suggest that poor nutrition accounts for 4.6% of the total disability-adjusted life-years
438 lost in the EU, with obesity and physical inactivity accounting for an additional 3.7% and
439 1.4%, respectively (WHO, 2003c). In a WHO report the quantitative contribution of dietary
440 risk factors in the European Region to the burden of disease was estimated. Hypertension, high
441 serum cholesterol levels, obesity and low intake of vegetables and fruit, along with smoking
442 contributed to the top 5 most important risk factors (WHO, 2003c).

443 In most European countries, cardiovascular diseases contribute about 40% to all cause
444 mortality. Within this category of diseases coronary heart disease and stroke are the most
445 important ones. Coronary heart disease contributes about 50% to total cardiovascular diseases
446 and stroke about 25%. Cardiovascular mortality patterns show a clear West-East gradient in
447 both men and women with the highest mortality rates in Eastern Europe. On the other hand,
448 the lowest stroke rates were observed in northern and western European countries, e.g. Sweden,
449 Denmark, The Netherlands and Germany (Kromhout, 2001).

450 In Europe, the prevalence of obesity and type 2 diabetes is rising. Evidence from population
451 surveys suggest that obesity levels in the EU have risen by between 10-40% over the past
452 decade and current data suggest that the range of obesity prevalence in EU countries is from
453 10% to 27% in men and up to 38% in women. In some EU countries more than half of the
454 population is overweight. In Finland, Germany, Greece, Cyprus, the Czech Republic, Slovakia
455 and Malta the combination of reported overweight and obesity exceeds the 67% prevalence
456 (IOTF, 2005). Furthermore, the prevalence of overweight and obesity among children is rising
457 significantly. Surveys show overweight and obesity levels among children in Southern Europe
458 to be higher than in Northern European countries. In Malta, Crete, Spain, Portugal and Italy
459 overweight and obesity levels exceed 30% among children aged 7-11. The rates of the increase
460 in childhood overweight and obesity vary, with England and Poland showing the steepest
461 increase (IOTF, 2005). The major problem associated with childhood and adolescent obesity is
462 its possible persistence into adult life, its association with increasing cardiovascular disease and
463 diabetes risk in later life and with premature death (Nicklas *et al.*, 2002; Maffeis and Tato,
464 2001).

465 In order to obtain the most precise picture, it is necessary to distinguish age/gender groups and
466 specific population groups that are affected by the different problems.

467 *In setting FBDG for individual countries it is important:*

- 468 • *to review the specific diet-related health patterns, diseases and mortality in this area*
- 469 • *to identify the nutrition problems of public health significance*
- 470 • *to try to rank the different problems according to their potential impact on health.*

471 **4.3. Identification of nutrients of public health importance**

472 These are nutrients for which there is evidence of a dietary imbalance in the population that
473 might influence the development of overweight and obesity or diet-related diseases such as
474 cardiovascular disease or other disorders; they include nutrients that might be consumed to
475 excess, e.g. energy, total fat, saturated and trans fatty acids, sugars and salt, as well as those for
476 which intake might be inadequate, e.g. unsaturated fatty acids, dietary fibre, as well as some
477 vitamins and minerals (such as vitamin D, folate, potassium, calcium, iron, iodine) (EFSA,
478 2008a).

479 Representative and country-specific epidemiological studies on health and diet relationships
480 are not always available. Dietary reference values (DRV) for nutrients nowadays generally take
481 into account long-term effects of nutrient intake levels on health outcomes. Therefore the
482 comparison of intakes with DRV can be used as a surrogate. This comparison gives some
483 information about nutrient adequacy in the general population and/or in subgroups (EFSA,
484 2008a). This is an important step to identify critical nutrients in diet-related health problems,
485 i.e. the nutrients whose intakes are excessive or inadequate as compared to DRV. Careful check
486 of underreporting and food composition issues is important in order to arrive at sound
487 conclusions.

488 In addition, anthropometry and appropriate biochemical markers of nutrient adequacy can be
489 used, where available.

490 Since health related dietary effects do not rely only on the intake of nutrients, but also on the
491 consumption of specific foods, critical foods are analysed in section 4.4.

492 In evaluating nutritional adequacy of diets, the levels of intakes obtained from food
493 consumption data are compared to DRV (e.g. Average Requirements (AR), Adequate Intake

494 (AI), Recommended intake ranges (RI)). Nutrient imbalances identified by such evaluation
495 may be characterised in different ways, e.g. as mean intakes, as intake distributions, as
496 prevalence of inadequate/excessive intake. Such characterisations may be used by policy
497 makers as a basis to set desirable and attainable nutrient intake targets to be achieved at a
498 population level that can be used to guide the development of FBDG. Possible targets might be
499 a specified (high) level of compliance with specific nutrient intake recommendations or
500 achievement of a specified population mean intake for a nutrient. These targets would also
501 provide a basis for monitoring the effectiveness of FBDG.

502 Food consumption data may be collected at the national, household or individual level. The
503 latter type is most relevant for assessing dietary adequacy. According to WHO (2006), data on
504 individual dietary intakes are available in nearly all European countries. Twenty-four Member
505 States indicated that they have collected individual dietary intake data among adults; about 21
506 countries undertook surveys for adolescents and school children and about 17 and 11 countries
507 for elderly people and pre-school children, respectively. The methods used for estimating
508 dietary intakes varied between the Member States and even within countries. Food frequency
509 questionnaires (FFQ) and 24-hour recalls were used most frequently for adults, followed by
510 two- or seven-day dietary records. Several countries also rely on Household Budget Survey
511 (HBS) data.

512 Twenty-nine (candidate) EU Member States provided information to WHO on macronutrient
513 intake. The data indicated that total fat and SFA are consumed in excess of recommendations in
514 most European countries. In 93% of the countries average intake of total fat was above 30% of
515 energy intake (E%), with the highest intake in Latvia, Lithuania and Slovenia (~41-45 E%).
516 Only in Italy the intake of SFA was below 10 E%.

517 In most countries carbohydrate intake varied between 39 and 49 E%. Only in Portugal,
518 Slovakia (females) and Finland (females) the carbohydrate intake was 50 E% or more. Protein
519 intake ranged from 11 to 16 E%. As a whole, females tended to have lower fat and higher
520 carbohydrate intakes (E%) than males (WHO, 2006).

521 Some EU countries reported deficiencies of iron and vitamin A. Western European countries
522 also reported iron deficiency anaemia. Iodine deficiency disorders appeared to be a problem in
523 several countries, but not all use universal salt iodisation; most countries iodise household salt
524 only (WHO, 2006).

525 These findings are in agreement with data on energy and nutrient intake in the European Union,
526 reported by Elmadfa and Weichselbaum. (2005). These authors also mentioned a generally
527 inadequate intake of some vitamins (especially vitamin D and folate) and of calcium in some
528 countries, and a too high intake of sodium.

529 *In setting FBDG for individual countries or regions it is therefore important:*

- 530 • *to identify nutrients of public health importance for the population (group) in that*
531 *specific country or region by comparing habitual intake from dietary surveys to the AR,*
532 *AI, RI*
- 533 • *to identify nutrients of public health importance for the population (group) in that*
534 *specific country or region by using anthropometric and biochemical indicators*
- 535 • *to prioritise those nutrients consumed at levels not in accordance with DRV and for*
536 *which there is evidence of an important health relationship in that specific country or*
537 *region.*

538 **4.4. Identification of foods relevant for FBDG**

539 The aim of this step is to identify foods that i) are the main vehicles for nutrients of public
 540 health importance or ii) have established relationships to health. A major impact on health
 541 outcomes and nutrient intakes would be expected from modifications of the level of
 542 consumption of these foods.

543 **4.4.1. Food groups that are sources of nutrients of public health importance**

544 Fat intake is used as an example as it is of concern for most European countries.

545 By calculating the contribution of foods and food groups to the intake of nutrients, the main
 546 contributors to the intake of critical nutrients can be distinguished. Table 1 shows for instance
 547 that in the 2001 diet of adults in the UK meat and meat products, cereals and cereal products
 548 (including biscuits/cakes/pastries), milk and milk products (including cheese), butter and fat
 549 spreads and potatoes and savoury snacks were the main sources of total fat, together
 550 contributing 78 % of total fat, 82 % of SFA and 87 % of trans fatty acid intake (Henderson *et*
 551 *al.*, 2002).

552 Table 1: **Percentage contribution of food groups to average daily fat (total fat, saturated**
 553 **fatty acids (SFA), monounsaturated fatty acids (MUFA), polyunsaturated fatty**
 554 **acids (PUFA) and trans fatty acids (TFA)) intake by adults in the UK (source:**
 555 **Henderson *et al.*, 2002)**

Type of food	Total fat %	SFA %	MUFA %	n-3 PUFA %	n-6 PUFA %	TFA %
Meat & meat products	23	22	27	17	18	21
Cereals & cereal products	19	18	17	17	20	26
of which : pizza	2	2	2	2	2	1
white bread	2	1	2	3	4	1
biscuits/buns/cakes/ pastries	7	8	7	2	5	17
Milk & milk products	14	24	10	4	3	16
of which: cheese	6	10	4	2		8
Butter & spreading fats	12	11	11	7	14	18
Potatoes & savoury snacks	10	7	12	17	13	6
of which: chips	5	3	6	12	7	4
savoury snacks	3	3	4	1	3	1
Eggs & egg dishes	4	3	5	2	4	3
Vegetables (excluding potatoes)	4	2	4	11	9	1
Fish & fish dishes	3	2	4	14	4	3
Sugar preserves & confectionery	3	5	3	1	1	4
Fruit & nuts	2	1	3	4	3	0
Others	6	5	4	6	11	2

556 In the diet of Irish adults, meat and meat products, butter/spreading fats and oils,
 557 biscuits/cakes/pastries, and milk/yoghurt were the four main sources, together contributing
 558 58% of total fat intake (www.iuna.net). In France, fat came mainly from butter, cheese, meat
 559 products, oils and biscuits/cakes/pastry (Volatier and Verger, 1999). In the Netherlands, meat
 560 and meat products (20%), spreading fats and oils (19%), milk and milk products, including
 561 cheese (19%) and biscuits/cakes/pastry (8%) were the main sources of total fat in the diet of
 562 young adults. Together these sources also accounted for three fourths of the intake of SFA,
 563 58% of unsaturated fatty acids and 62% of trans fatty acids (Hulshof *et al.*, 2004).
 564

565 Analysis at the level of the whole population provides average consumption levels, mixing
566 consumers and non-consumers of specific foods or food groups. It is useful in this step to study
567 the specific contributions of some food groups only in consumers of the foods of these groups.
568 From the different examples given, it could appear that cheese is a relatively low contributor as
569 compared to other groups; however, for cheese consumers alone, the situation could be
570 somewhat different and cheese might represent a major contributor, suggesting that specific
571 messages for consumers could be envisaged.

572 To decrease fat intake in the population, it is helpful to identify those foods which best
573 discriminate those people who have a level of fat intake in compliance with recommendations
574 from those who have not by studying the data in more detail.

575 Data of the national food consumption survey in Ireland also showed that the food groups of
576 cereal and dairy products together make important contributions to energy, macronutrient and
577 micronutrient intakes in adults (Burke *et al.*, 2005). Cereal products were important sources for
578 the mean intake of energy (26%), protein (21%), fat (13%), carbohydrate (41%), dietary fibre
579 (45%), iron (43%) and folate (27%). Dairy products contributed largely to the mean daily
580 intakes of energy (11%), protein (14%), fat (17%), calcium (48%), phosphorus (24%) and
581 vitamin A (27%). Comparable studies in UK (Henderson *et al.*, 2002) and Italy (Turrini *et al.*,
582 2001) revealed similar conclusions regarding their quantitative importance in the diet. Burke *et al.*
583 (2005) studied the role of these products in depth by examining the quality of the diet in
584 those who are high, medium and low consumers of cereal and dairy products, and examined the
585 potential use of this information for FBDG. Analysis of nutrient intakes across tertiles of cereal
586 and dairy consumption showed that high consumers of wholemeal bread and breakfast cereals
587 had lower fat and higher carbohydrate, fibre and micronutrient intakes than low consumers of
588 these foods. High consumption of reduced-fat milk and yoghurt was also associated with lower
589 fat and higher fibre and micronutrient intakes, particularly in women. According to these
590 results, an increased consumption of wholemeal bread (by increasing the number of consumers
591 or the number of servings or the serving sizes) could help to reduce the percentage of fat and to
592 increase the intake of dietary fibre, folate and iron in Irish adults.

593 This example illustrates that a detailed analysis of the contribution of individual staple foods
594 provides valuable information for the development of FBDG. It also shows the importance to
595 identify foods which account for a high proportion of inter-individual variability in the intake
596 of a given nutrient (Leclercq and Arcella, 2001). Other examples can be found in the literature
597 (Turrini *et al.*, 1999; Anderson and Zlotkin, 2000; Matthys *et al.*, 2006).

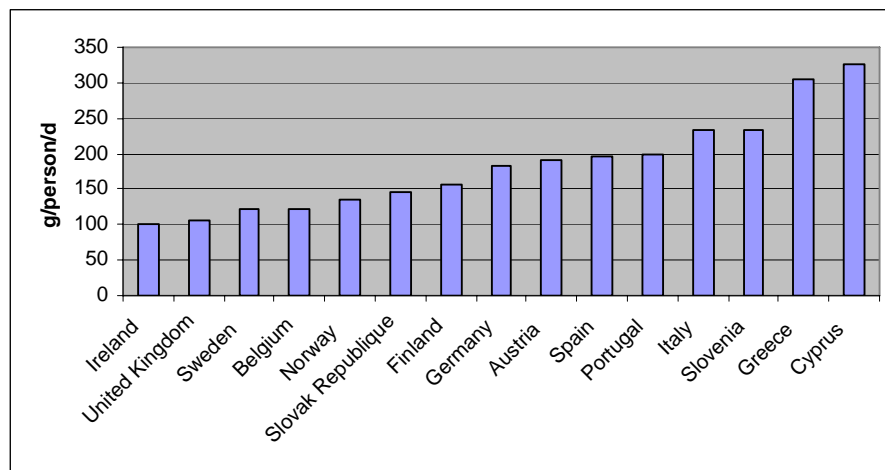
598 The development of FBDG targeted to specific population groups (such as children, elderly
599 people, pregnant women or women of childbearing age, sportsmen) would require this type of
600 analysis based on the relevant data.

601 Country-specific food cooking/processing that may affect nutrient content or bio-availability,
602 as well as food availability and seasonality, should be further considered at this step. The
603 contribution of fortified foods and dietary supplements to micronutrient intake should also be
604 taken into account.

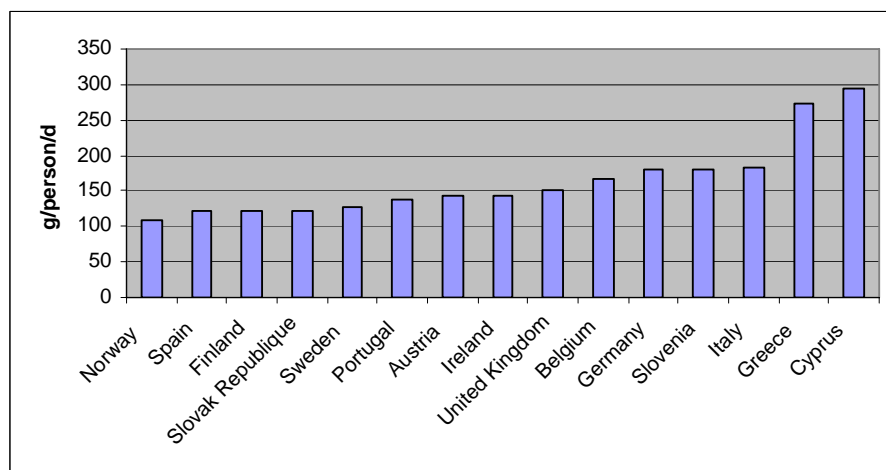
605 **4.4.2. Food groups with established relationships to health**

606 For some foods, there is evidence of health benefit that cannot be attributed to their specific
607 content of nutrients. For instance, a higher consumption of foods from the fruit and vegetable
608 group has been associated with a lower risk of some chronic diseases (Eurodiet, 2000; WHO,
609 2003b), an effect that cannot be easily explained on the basis of specific nutrients.

610 Fruit and vegetable consumption varies considerably among countries, in large part reflecting
 611 the prevailing economic, cultural and agricultural environments. Although data of household
 612 budgets surveys reflect the availability of foods rather than the consumption, the data allow
 613 comparisons between European countries. For instance, these data show that for fruit in Europe
 614 the mean availability per person per day is highest in the Southern countries (figure 3). The
 615 availability of vegetables in Cyprus and Greece is much higher than in other European
 616 countries (figure 4). National food consumption surveys at the individual level provide more
 617 information on the consumption in specific population groups, consumption occasions,
 618 differences among high and low consumers etc. and should preferably be used when available.
 619



620 Figure 3: **Mean availability of fruit in selected European countries in the period 1996-**
 621 **2000 (source: DAFNE; <http://www.nut.uoa.gr/dafnesoftweb>)**
 622



623 Figure 4: **Mean availability of vegetables in selected European countries in the period**
 624 **1996-2000 (source: DAFNE; <http://www.nut.uoa.gr/dafnesoftweb>)**
 625 *In setting FBDG for individual countries it is therefore important:*

- 626 • to identify main dietary sources/rich sources of the nutrients of public health
627 importance
- 628 • to identify foods which explain differences between those who do and those who do not
629 achieve target nutrient recommendations
- 630 • to consider the level of consumption of foods with established relationships to health
631 that are not nutrient specific.

632 Indeed some objectives and recommendations which have been shown to be associated with
633 health can already be derived at this step for the general population or for high or low
634 consumers of a specific food (sub)group. FBDG can thus be processed from that step for
635 finalisation of guidelines and implementation (see section 5). However, whenever possible, one
636 or more of the following steps (4.5 - 4.7) could be useful.

637 **4.5. Identification of food consumption patterns**

638 Epidemiological research is increasingly investigating the relationship of health with overall
639 diet rather than with single nutrients, foods or food groups. Results from the Dietary
640 Approaches to Stop Hypertension trial (DASH) (Appel *et al.*, 1997, Sacks *et al.*, 2001) showed
641 that a diet rich in fruit, vegetables, nuts and low-fat dairy products has a favourable influence
642 on some cardiovascular disease risk factors, including reduction of blood pressure. Various
643 studies have indicated that consumption of a traditional Mediterranean diet is associated with
644 reduced risk of mortality from cardiovascular diseases and certain types of cancer in several
645 countries (Trichopoulou *et al.*, 1995 and 2005; Lagiou *et al.*, 2006; Kouris-Blazos *et al.*, 1999;
646 Osler and Schroll, 1997). Significant associations have also been observed between dietary
647 pattern and dyslipidemia (Van Dam *et al.*, 2003), and the risk of chronic obstructive pulmonary
648 disease (Varrasso *et al.*, 2007). These health benefits cannot be readily attributed to specific
649 nutrient contents of such diets.

650 Food consumption patterns consist of specific associations of foods or food groups that can be
651 distinguished within a population. The use of statistical techniques is required to define these
652 patterns using food consumption data. In addition, the analysis might take into account other
653 parameters, such as the distribution (nature and quantity) of the foods over the different meals,
654 the chronology and the place of consumptions (Kearney *et al.*, 2001; O'Dwyer *et al.*, 2005).
655 This can only be done if the relevant information is provided by the dietary survey.

656 Identification of food consumption patterns might be helpful in setting FBDG:

- 657 • to demonstrate or support the feasibility of the FBDG if some existing patterns already
658 comply with nutrient recommendations and proposed FBDG
- 659 • to ensure the coherence of recommendations for the total diet
- 660 • to enhance cultural acceptability, targeted recommendations and targeted
661 communication, because dietary changes may be more readily achieved if
662 recommended foods are compatible with existing food consumption patterns.

663 To examine food consumption patterns, generally two approaches have been used, i.e. the a
664 priori and the a posteriori approach.

665 The a priori approach is based on prevailing knowledge concerning favourable or adverse
666 effects of various dietary constituents. Diets are assessed for the presence or absence of certain
667 food or nutrient characteristics, and the resulting score is then operationalized as a dietary

668 exposure variable (Kant, 2004, Patterson *et al.*, 1994; Kennedy *et al.*, 1995; Trichopoulou *et al.*, 1995; Huijbregts *et al.*, 1997; Haines *et al.*, 1999; McCullough *et al.*, 2002).

670 The a posteriori approach is data driven, with exposure summarised using factor or cluster
671 analysis. Factor analysis may be considered as a pattern detection method that reduces the
672 number of dietary variables by transforming the original large set of correlated dietary
673 variables into a new, smaller set of uncorrelated variables, which are called principal
674 components or factors (Prevost *et al.*, 1997; McCann *et al.*, 2001; Schulze *et al.*, 2001; Balder
675 *et al.*, 2003; Van Dam *et al.*, 2003; Costacou *et al.*, 2003; Bamia *et al.*, 2005, Varraso *et al.*,
676 2007). In contrast to factor or principal component analysis, cluster analysis classifies persons
677 into naturally existing, mutually exclusive groups on the basis of a similarity in food intake
678 (Hulshof *et al.*, 1992; Tucker *et al.*, 1992; Wirfalt and Jeffry, 1997; Greenwood *et al.*, 2000;
679 Villegas *et al.*, 2004).

680 Irrespective of the approach used, patterns characterised by fruit, vegetables, whole grain, fish,
681 poultry consumption generally have been reported to relate to micronutrient intake, and to
682 selected biomarkers of dietary exposure and disease risk in the expected direction (Kant, 2004).

683 The determination of country-specific food consumption patterns can be complemented by
684 other analyses. When extended socio-demographic data are available in the dietary surveys,
685 they allow to characterise the population following each pattern. In the French survey INCA
686 (“Enquête Individuelle et Nationale sur les Consommations Alimentaires”), five patterns have
687 been distinguished using an a posteriori technique: the pattern rich in fruits and vegetables,
688 with a low energy density and diversified diet is followed essentially by middle aged women
689 (the population in the pattern is 80 % women, 75% being above 45 yr of age); on the opposite,
690 the pattern rich in high energy dense foods, low in fruits and vegetables and with a low
691 diversity is followed essentially by middle-aged men (90 %) of medium or low socio-cultural
692 categories (Martin, 2001). In the food consumption patterns distinguished by Van Dam (2003)
693 (see above), higher scores for the ‘traditional’ pattern were associated with older age, and
694 higher scores for the ‘refined-foods’ pattern with younger age, but both were associated with
695 lower educational level, cigarette smoking, less physical activity, and higher body mass index.

696 *In setting FBDG for individual countries it is therefore important:*

- 697 • *to identify main food consumption patterns in the population*
- 698 • *to identify those patterns which are likely associated to a better health*
- 699 • *to identify foods characteristic of the more favourable patterns or less favourable*
700 *patterns as the basis for food intake recommendation*
- 701 • *to identify the characteristics of the population for each pattern of food consumption for*
702 *targeting recommendations and actions*
- 703 • *to derive recommendations to be included in FBDG.*

704 At this step finalisation and implementation of FBDG can be done (see section 5); however,
705 whenever possible, one or both of the following steps should be useful.

706 **4.6. Testing and optimising FBDG**

707 This step is useful to confirm that adherence to FBDG is compatible with nutrient intake
708 recommendations and does not lead to dietary imbalance. Consideration of different scenarios
709 and iterative adjustments may help to optimize FBDG. Different modelling methodologies can
710 be used and some non-exhaustive examples are given below.

711 In Germany, Kersting *et al.* (2005) composed 7-day menus for children (4-6 years) and
712 adolescents (13-14 year), taking into account the German meal patterns, common non-fortified
713 foods, and sensory preferences of children (practical criteria). Food amounts and food selection
714 within the menus were optimised in order to reach the German dietary reference values for 22
715 nutrients (scientific criteria). Compared to the existing diet reported from the DONALD study,
716 the Optimized Mixed Diet (OMD) was lower in fat and SFA. Nutrient densities for age groups
717 were achieved or exceeded, except for folate. Foods from the optimised menus were classified
718 into 11 food groups based on nutritional and practical considerations. Proportions of food
719 groups were expressed by weight and could be used to recalculate food amounts for various
720 age groups or energy requirement, respectively. For the communication to the general public
721 (see section 5.1.1) it was simplified into the slogans “recommended foods” and “tolerated
722 foods” distinguished by their nutrient densities. Three simple rules for food consumption were
723 deduced, i.e. beverages and plant foods: ample; animal foods: moderate; high-fat, high-sugar
724 foods: sparingly. The OMD demonstrates that a single diet concept with a core of quantified
725 food groups can be adequate for age groups between 1 and 18 years within a country, such as
726 Germany.

727 In the Netherlands, using data from recent dietary surveys, a number of food groups have been
728 characterised as basic foods, i.e. groups of foods with a high nutrient density that are important
729 for micronutrient supply in the typical Dutch diet. The other food groups, with a low nutrient
730 density, but usually a high energy density, are considered as non basic food groups. Within
731 each of these groups of basic foods, a tripartite classification (food to use ‘preferably’, ‘middle
732 road’ and ‘exceptionally’) has been made for each individual food, based on their nutritional
733 quality. The criteria for this classification are based on analysis of the nutrient content of the
734 typical Dutch diet in relation to the desired composition based on data from scientific
735 (epidemiological) research. Data of the Dutch food consumption survey and model calculations
736 have been used to quantify recommended amounts for all groups of basic food for different
737 population groups. In general, the basic diet provides roughly the recommended amounts of
738 various micronutrients but not sufficient energy. Therefore, consumers may choose from non
739 basic food groups to fill this gap. Excessive energy intake should be avoided by providing
740 tailored information on the energy content per serving (www.Voedingscentrum.nl).

741 In France, using data from a representative dietary survey, different methodologies were used
742 to assess the possible impact of the implementation of the FBDG (Martin, 2001). To assess the
743 recommendation about the consumption of dairy products, the average amount of dairy product
744 intake of the average consumer has been determined (x g of full milk, y g of low fat milk, z g of
745 yoghurt, n g of cheese etc.). The result of recommending the consumption of 3 milk products
746 per day was calculated using the corresponding food composition table, providing an estimate
747 of the possible average intake for all nutrients. The modelling is repeated for all the
748 recommendations.

749 Linear programming (Ferguson *et al.*, 2004) from a food database is now frequently used to
750 establish diets fulfilling a set of constraints and goals (Ferguson *et al.*, 2006; Rambeloson *et al.*,
751 2007). It could also be used to identify the foods that are indispensable to establish diets which
752 fulfil all the nutrient recommendations. The comparison of the result of linear programming to
753 the actual food consumption can give quantitative estimates of the magnitude of the desirable
754 change.

755 These techniques can also take into account food prices (Maillot *et al.*, 2007), especially when
756 recommendations are made for people assisting low income persons. For example, it has been
757 shown by linear programming that to comply with the population reference intakes in France at
758 least 5 euros per day are required. This could be decreased to 3 euros by using cheaper and

759 highly nutritious foods that are, however, not frequently present in the food repertoire of the
760 target population group (Maillot *et al.*, 2007). It is important for the successful implementation
761 of recommendations that economical considerations are taken into account in the final
762 recommendations.

763 *In setting FBDG for individual countries it is therefore useful:*

- 764 • *to model effectiveness and potentially undesirable effects on overall dietary balance*
- 765 • *to modify and adapt FBDG according to the results of modelling and in accordance*
766 *with conditions prevailing in the country.*

767 **4.7. Graphical representations of the FBDG**

768 For communication purposes to consumers (see section 5.1.1), it is often useful to present
769 recommendations using graphical formats. These formats facilitate the promotion and
770 dissemination of guidelines and increase their understanding, which will assist consumers in
771 selecting a healthier diet (Koenig, 2007). Various formats have been used in different countries
772 and are easily available in articles, books or websites. However, they would require adaptations
773 to the country-specific FBDG which would need a scientific validation. Examples of graphic
774 formats are food pyramid, food plate, food circle, food boat. In addition, interactive tools could
775 be developed, e.g. for use on official websites (such as in USA, France). A recent example for a
776 graphical tool was developed by the National Institute of Public Health and the Environment in
777 the Netherlands (Wilson-van den Hooven *et al.*, 2008).

778 The best graphical format for a given population should be determined in collaboration with
779 people in charge of the communication.

780 *In setting FBDG for individual countries it may be therefore useful:*

- 781 • *to develop graphical representations of FBDG in order to facilitate communication to*
782 *consumers*
- 783 • *to adapt and validate existing tools for the country-specific FBDG or to develop*
784 *country specific graphical tools.*

785 **5. Implementation and evaluation of FBDG**

786 Once established, FBDG need to be implemented and results monitored and evaluated.

787 **5.1. Implementation**

788 Experience from countries, which already have developed FBDG, shows that the existence of
789 FBDG is not always followed by the necessary compliance by consumers, awareness of
790 policymakers and nutritional educators. Therefore, having FBDG alone is not effective in
791 managing or preventing the diet related health issues. Their effectiveness depends on their
792 integration into a coherent food nutrition policy going beyond communication to consumers
793 alone (Stockley, 2001; Walter and Elmadfa, 2007).

794 Therefore, when established, FBDG can be used in different ways following an implementation
795 plan.

796 **5.1.1. Communication to consumers**

797 The consistency of the communication of nutrition messages to consumers is essential.

798 This can only be achieved through a multidisciplinary, interactive approach involving
799 professionals from various fields of expertise, such as communication experts, specialists in
800 social sciences, cognitive sciences or psychology, specialists in food behaviour, and
801 nutritionists.

802 When the final selections of foods (and quantities) have been made through the steps described
803 in section 4, guidelines can be transformed into messages and slogans. For the general public it
804 is important that messages are practical, comprehensible, simple and easy to remember. As a
805 general rule, it could be recommended that these communications tools are pre-tested on
806 representatives of the targeted population for a better adaptation of the tool. Post-testing can
807 also be informative.

808 Various channels can be used for communication, depending on available resources and
809 structures devoted to institutional communication (such as government, nutrition societies,
810 consumer organisations): e.g. leaflets, booklets, media campaigns, TV advertising. FBDG can
811 also be integrated into the school educational curricula.

812 **5.1.2. Communication to professionals**

813 Adapted communication including the scientific rationale and background can be made to
814 various health professionals, and FBDG should be integrated into their curricula.

815 Other professionals who could be targeted are those working in the food/diet area (such as
816 canteen chefs, workers of the food industry) or in the area of services to disabled/elderly
817 people.

818 **5.1.3. Application to policies**

819 Accepted FBDG can together with other nutrition related data be used as a basis of policies
820 with respect to health and nutrition. FBDG could also be considered in devising meal programs
821 of institutions or organizations such as school canteens, hospital, catering services.

822 **5.2. Monitoring and evaluation**

823 The implementation of FBDG should be accompanied by monitoring and evaluation of the
824 effects. The results of the monitoring and evaluation should be used to introduce necessary
825 changes in FBDG or their implementation.

826 Different types of indicators, both of implementation and effect, can be collected in various
827 time frames, depending on the available tools and resources. Each country should define the
828 indicators which will be measured at baseline and during the follow up, using already existing
829 indicators or developing more specific indicators. It should be kept in mind that food
830 consumption patterns and health status are influenced by several factors, so that most of these
831 indicators do not allow to unravel the specific effect of implementation of FBDG, especially
832 when other actions are implemented at the same time, especially in the context of nutrition-
833 health policy.

834 **5.2.1. Monitoring of implementation**

835 Indicators of “activity” are the most simple and easy to collect: such as number and contents of
836 leaflets, booklets, which are distributed/sold/requested over time, number and contents of
837 advertising campaigns and their impact.

838 Consumer or health professional surveys can determine the awareness of the existence and the
839 knowledge of the content of the guidelines.

840 The above indicators can be quantified; the impact of FBDG on policies can be assessed in a
841 qualitative way.

842 **5.2.2. Evaluation of the effects**

843 The evaluation of effects can be based on the quantification of the evolution of food
844 sales/purchases, food composition, food consumption and health status. These indicators do not
845 have the same time scale, health status requiring the longest follow-up.

846 *Changes in food sales/purchases* - Different indicators already exist in many countries,
847 sometimes since a long time, that allow monitoring of trends in food purchases or sales, either
848 public (e.g. statistics of ministries in charge of Agriculture or Economy) or private. Taking into
849 account that they were not designed for this purpose and that sales or purchases do not reflect
850 the true picture of consumption, their careful analysis and cautious interpretation may allow
851 detection of changes in trends over time.

852 *Changes in food composition* - FBDG could have an impact on the composition of food
853 products and on food reformulation by industry (Leclercq *et al.*, 2001). The monitoring of such
854 changes is important, because the knowledge of nutrient contents of foods is essential to assess
855 nutrient intake trends in a population (Beemster *et al.*, 2000).

856 *Changes in food/nutrient consumption* - Indicators are obtained through representative
857 individual dietary surveys. Indices of compliance with FBDG can be used (Kennedy *et al.*,
858 1995; Rafferty *et al.*, 2002). Recently, Fogli *et al.* (2006) developed the 2005 Dietary
859 Guidelines Adherence Index (DGAI), an instrument consisting of a total of 20 items, to
860 measure the adherence to the target dietary intake recommendations using individual dietary
861 data. To enhance comparability of food consumption surveys across Europe, the results of the
862 European programs Efcosum (Löwik and Brussaard, 2002) and Dafne (Lagiou *et al.*, 2001)
863 should be taken into account.

864 *Changes in health status* - Indicators can include validated biomarkers as well as clinical
865 endpoints such as morbidity and mortality. Whether there is a need for the development of
866 more specific indicators in relation to diet could be addressed.

867 **6. FBDG in Member States**

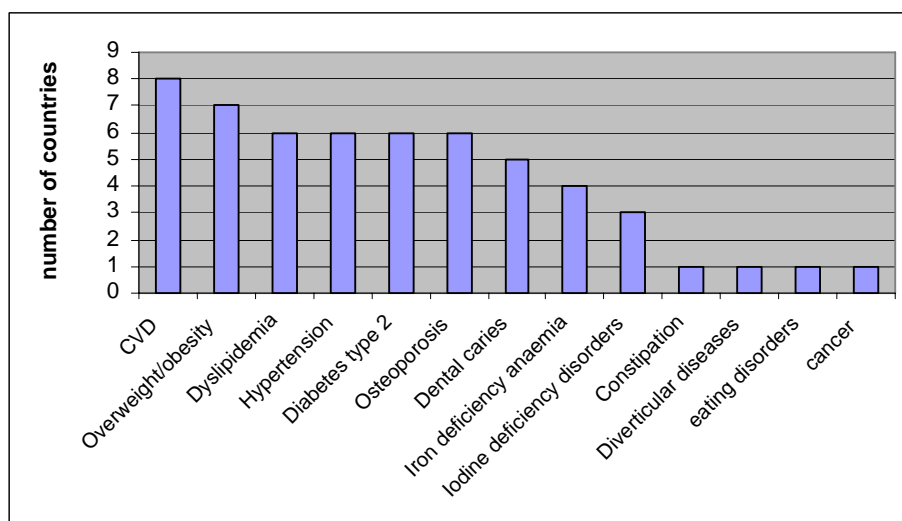
868 In 2002, WHO assessed the existence of national, governmental-endorsed food-based dietary
869 guidelines in 48 Member States of the WHO European Region. Of the 25 countries that
870 reported to have national FBDG (either officially endorsed or not), most included information
871 similar to that put forth in the CINDI guidelines. However, quantification of portions and sizes
872 was often unclear and difficult to interpret. Important discrepancies in national FBDG were
873 observed (WHO, 2003a). No information was available on the process of development of these
874 FBDG.

875 To get more information on the availability of FBDG and the principles in setting these FBDG,
876 a computerised questionnaire (Annex 1) was sent to 20 Member States and 13 responses were
877 obtained. The results are briefly summarised in this section (see also Annex 2).

878 Eleven out of these 13 countries reported having FBDG. One country reported that their most
879 recent FBDG dated from 1994; in the other countries they were established between 2001 and
880 2007. Most FBDG were country-specific. Two countries reported the use of the WHO CINDI

881 dietary guide (one country together with FBDG from another country). In developing FBDG,
882 eight countries reported to take into account country-specific diet-related health problems.
883 Cardiovascular diseases, overweight/obesity, dyslipidemia, hypertension, type 2 diabetes,
884 osteoporosis and dental caries were mentioned most frequently (Figure 5).

885



886 Figure 5 **Diet-related health problems reported to be taken into account by FBDG in 8**
887 **countries**

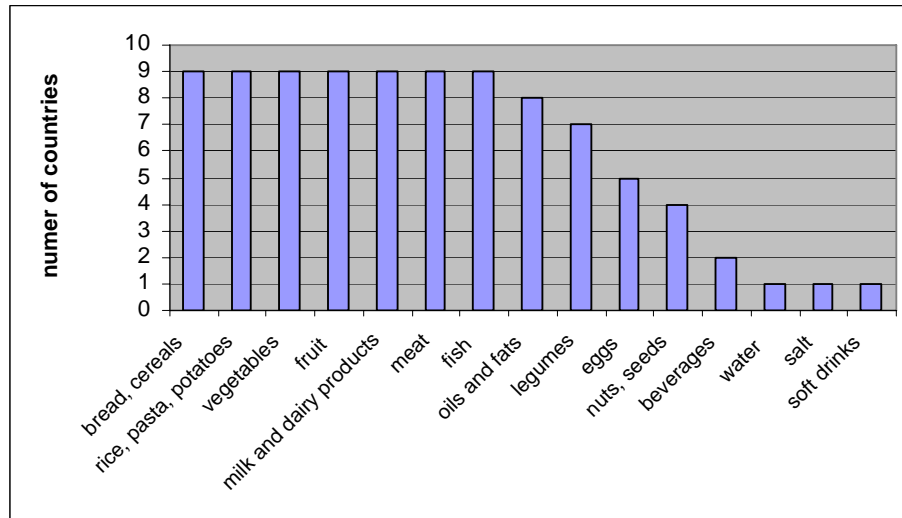
888 For reviewing food consumption patterns most countries used individual food consumption
889 data, followed by food consumption data on the household level and national food supply data.
890 For the assessment of adequacy of the diet, nearly all countries used their national dietary
891 reference values. The number of principal nutrients addressed by FBDG varied between the 8
892 countries. Only SFA and dietary fibre were mentioned by all eight countries, total fat, n-3 fatty
893 acids, added sugars, calcium, iron and folate by seven countries. Energy, total protein, other
894 fatty acids (MUFA, PUFA, n-6 and trans fatty acids), total carbohydrates and vitamin D were
895 mentioned by 6 countries (Table 2).

896 Table 2. **Principal nutrients reported to be addressed in national FBDG**

Eight countries	Seven countries	Six countries	Five countries	Four countries	Three countries	Two countries	One country
SFA	Total fat	Energy	Cholesterol	Animal protein	Plant protein	Total sugars	Phosphorus
Dietary fibre	n-3 FA	Total protein	Complex CHO	Zinc	Water	Iodine	Copper
	Added sugars	MUFA	Sodium	Vitamin A	Potassium		Alcohol
	Calcium	PUFA	Vitamin C	Vitamin B1	Magnesium		
	Iron	n-6 FA		Vitamin B2	Selenium		
	Folate	TFA		Niacin			
		Total CHO		Vitamin B6			
		Vitamin D		Vitamin B12			

897 SFA = Saturated Fatty Acids; FA = Fatty Acids; MUFA = Monounsaturated Fatty Acids; PUFA = Polyunsaturated Fatty
898 Acids; TFA = Trans Fatty Acids; CHO = Carbohydrates

899
 900 Seven food groups are common in the FBDG of 9 countries: bread/cereals; rice/pasta/potatoes;
 901 vegetables; fruit; milk/dairy products; meat; fish. Other food groups included were oils/fats,
 902 legumes and eggs (figure 6). In most countries the amounts of food were quantified or partly
 903 quantified.



904 **Figure 6 Food groups reported to be included in national FBDG**

905 Only three countries reported modelling of diets or performing simulation studies, to optimise
 906 guidelines and to study the effects of FBDG on the total diet before finalising FBDG.

907 FBDG were mostly directed to the general population and adults, but pregnant women, school
 908 children, pre-school children, adolescents and elderly were also mentioned.

909 Most countries included health-related and other messages in their FBDG. These
 910 recommendations were related to physical activity, food variety/balance, meal pattern and
 911 safety in cooking and preservation.

912 Five countries reported field-testing of FBDG before publication.

913 Most countries used a graphical representation of their FBDG. The use of food plates was
 914 reported five times, food pyramid and food circle three times each. In three countries no visual
 915 guides were used.

916 In most countries national nutrition or health institutes and/or the ministry of health were
 917 responsible for producing and revising FBDG.

918 Only three countries reported monitoring and evaluation of FBDG (Annex 2).

919 CONCLUSIONS AND RECOMMENDATIONS

920 From the analyses presented in this opinion and the results of the survey on FBDG in the EU,
 921 the Panel considers that it is not feasible to establish detailed and effective FBDG which could
 922 be used at the EU level:

- 923 • the priorities in public health may differ between countries. In most EU Member States
 924 cardiovascular diseases, cancer, hypertension, dyslipidemia, type 2 diabetes, overweight
 925 and obesity and osteoporosis can be identified as major public health issues. Therefore,
 926 it might be expected that FBDG in European countries can be based on the same diet-

927 health relationships. However, the priorities of the diseases addressed by FBDG may
928 substantially differ. From the survey reported in this Opinion, it appears that most
929 reporting countries established recently their own national FBDG and based their
930 FBDG on country-specific diet-related health problems;

931 • the priorities in selecting principal nutrients may vary, depending on the country-
932 specific nutrient intake levels and on the impact of the related diseases on morbidity and
933 mortality rates and the desirable changes;

934 • there are wide disparities in dietary/cultural habits and the availability of food products
935 between European Member States. Although the results of the questionnaire sent by
936 EFSA to a number of European Member States give only a rough indication, there was
937 little difference in the type of main food groups included in national FBDG. However,
938 due to variation in and between food patterns in Europe, the differences in type of foods
939 within main food groups and the recommended amounts might differ substantially.
940 Thus, the individual country has to take the (final) decision on which foods and in
941 which amounts are important and appropriate to include in their national FBDG;

942 • In developing FBDG it is important that the nutrient needs of the (target) population are
943 covered. Therefore, conducting of modelling and simulation studies of FBDG is
944 recommended. There is clearly a lack of European representative consumption data to
945 perform these modelling studies at the European level;

946 • FBDG will fail if the public finds them culturally unacceptable. In implementing FBDG
947 it is crucial that the messages are understood. Therefore, it is necessary to test FBDG
948 before a full implementation; this is difficult to achieve at the European level. To be
949 informative, pre-testing of FBDG should be performed on a specific population in a
950 specific cultural and dietary context.

951 Therefore, in this opinion, the main focus is on the scientific process of developing FBDG for
952 the diverse European populations, following a stepwise approach (see section 4). Most steps
953 can be achieved in different ways, depending on the desired change(s), the available
954 information and the available resources. To be successful, the process of developing FBDG
955 should be conducted using a multidisciplinary approach. Monitoring of the implementation and
956 the compliance with FBDG is considered to be essential. These areas require improvement in
957 several countries. The examples presented in several steps in this opinion are meant to be an
958 illustration of possibilities, without being exhaustive.

959 Establishing FBDG is an important step for the development of nutrition policies and for the
960 dissemination of consistent information about a healthy diet and lifestyle. Food-based dietary
961 guidelines should be integrated into other policies that have an impact on food availability
962 within the population and also fit with other public health messages. Therefore, it is
963 recommended to include into FBDG encouragement of daily physical activity and maintenance
964 of a healthy body weight and, if suitable, also other lifestyle and health-related messages.

965 If a country has no national FBDG, it can adapt and/or utilise existing FBDG from
966 neighbouring or similar countries that have already produced FBDG. The use of the CINDI
967 guide might be also an interim alternative (WHO, 2000). The present EFSA opinion could be
968 helpful by presenting suggestions how to realise the adaptations and implementation at the
969 national level.

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1271 **GLOSSARY / ABBREVIATIONS**

AI	Adequate Intake
AR	Average Requirement
CHO	Carbohydrate
CINDI	Countrywide Integrated Non-communicable Disease Intervention Project
COPD	Chronic obstructive pulmonary disease
DASH	Dietary Approaches to Stop Hypertension Trial
DHA	Docosahexaenoic acid
DONALD	Dortmund Nutritional and Anthropometric Longitudinally Designed (Study)
DRV	Dietary Reference Values
EC	European Commission
EFSA	European Food Safety Authority
EPA	Eicosapentaenoic acid
EPIC	European Prospective Investigation into Cancer and Nutrition
EU	European Union
FAO	Food and Agriculture Organisation
FBDG	Food-based dietary guidelines
FFQ	Food Frequency Questionnaire
HBS	Household Budget Survey
HDL	High density lipoprotein
ICN	The International Conference on Nutrition
INCA	“Enquête Individuelle et Nationale sur les Consommations Alimentaires” (national individual survey of food consumption)
IoM	Institute of Medicine
IOTF	International Obesity Taskforce
LDL	Low density lipoprotein
MUFA	Monounsaturated fatty acid
OMD	Optimized Mixed Diet
PRI	Population Reference Intakes
PUFA	Polyunsaturated fatty acid
RI	Range of Intake
SFA	Saturated fatty acid
SCF	Scientific Committee for Food

SNO	Swedish Nutrition Recommendations Objectified
TFA	<i>Trans</i> fatty acid
UK	United Kingdom
US	United States
USDA	United States Department of Agriculture
WCRF	World Cancer Research Fund
WHO	World Health Organisation

1272 **ANNEX 1: QUESTIONNAIRE**

1273 NAME:

1274 COUNTRY:

1275 AFFILIATION:

1276 E MAIL:

1277 DATE:

1278 In contrast to dietary reference values or recommended nutrient intakes, Food-Based Dietary
1279 Guidelines (FBDG) are the expression of the principles of nutrition education mostly as foods.
1280 They represent the form in which advice is provided to people to assist them in selecting a diet
1281 to meet their needs for health.

1282 The aim of this questionnaire is to get more information on the availability and the type of
1283 FBDG used in the EU (candidate) Member States, and the way of coming to these FBDG.

1284 To answer this questionnaire, please tick the relevant boxes.

1285 We kindly ask you to send back the filled survey by e-mail to:
1286 wolfgang.gelbmann@efsa.europa.eu

1287 Does your country have Food-Based Dietary Guidelines (FBDG)?

1288 yes no

1289 In which year were (the most recent) FBDG established:

1290 What is the origin of the FBDG used in your country?

1291 3.1 yes, translation of the CINDI dietary guide, WHO

1292 3.2 yes, translation of FBDG of other country, please specify the country:

1293 3.3 specially developed for your country

1294 If the answer is “yes” in 3.1 or 3.2 → please go directly to question No. 12

1295

1296 Are diet-related health problems in your country taken into account when developing FBDG?

1297 yes no (if “no” → go directly to question No. 6)

1298 To which diet-related health problems your national FBDG are focused?

1299 Cardiovascular diseases Constipation

1300 Dyslipidemia Diverticular diseases

1301 Hypertension Iron deficiency anaemia

1302 Type 2 diabetes Iodine deficiency disorders

1303 Overweight/obesity Dental caries

1304 Osteoporosis Malnutrition

1305 Others (please specify)

1306 What information was used to review food consumption patterns in your country?

- 1307 National food supply data
- 1308 Household data
- 1309 Individual food consumption data: please provide name and year of the survey:
- 1310 Were any other data used? Please specify:
- 1311 Which dietary reference values (nutrient based recommendations, recommended daily
1312 allowances etc.) were used in assessing adequacy of the diet
- 1313 Not assessed
- 1314 Values from own country
- 1315 Values from other country: please specify
- 1316 What key nutrients were determined to be addressed by the FBDG in your country?
- 1317 Energy Calcium
- 1318 Total Protein Iron
- 1319 Plant Protein Sodium
- 1320 Animal Protein Potassium
- 1321 Total Fat Magnesium
- 1322 Saturated fatty acids Selenium
- 1323 Monounsaturated fatty acids Zinc
- 1324 Polyunsaturated fatty acids Other minerals
- 1325 Omega-6 fatty acids Vitamin A
- 1326 Omega-3 fatty acids Vitamin B1
- 1327 Trans fatty acids Vitamin B2
- 1328 Cholesterol Niacin
- 1329 Total Carbohydrates Vitamin B6
- 1330 Complex Carbohydrates Folate
- 1331 Total sugars Vitamin B12
- 1332 Added sugars Vitamin C
- 1333 Dietary fibre Vitamin D
- 1334 Water Vitamin E
- 1335 Other food components:
- 1336 Other vitamins:
- 1337 Which food (groups) are finally included in your national FBDG?
- 1338 bread, cereals meat
- 1339 rice, pasta, potatoes fish
- 1340 vegetables eggs

- 1341 fruit oil/fats
- 1342 legumes nuts, seeds
- 1343 milk and dairy products Other food groups:
- 1344 Before finalising FBDG were modelling exercises, simulation studies etc. performed and were
1345 the effects on the total diet studied?
- 1346 yes no
- 1347 if yes, please describe the modelling and the possible nutritional consequences of
1348 implementing one or more food-based dietary guideline(s):
- 1349
- 1350 To which population groups are the FBDG in your country directed?
- 1351 General population
- 1352 Elderly Schoolchildren
- 1353 Adult Pre-school children
- 1354 Pregnant women Infants
- 1355 Adolescence Others
- 1356 Are amounts of foods quantified (recommended servings, portions or amounts)?
- 1357 yes; partly no
- 1358 if yes or partly, please specify:
- 1359 Are other health related messages (e.g. physical activity, smoking) included in your FBDG?
- 1360 yes no
- 1361 if yes, please specify:
- 1362 Are food safety (e.g. hygiene) messages included in your FBDG?
- 1363 yes no
- 1364 if yes, please specify:
- 1365 Are other messages (e.g. food variety, meal pattern) included in your FBDG?
- 1366 yes no
- 1367 if yes, please specify:
- 1368 Were any of the food-based dietary guidelines field-tested before publication?
- 1369 yes no
- 1370 if yes, please specify:
- 1371 Are FBDG in your country accompanied by graphs of food selection guides?
- 1372 None
- 1373 Yes, Food pyramid

- 1374 Yes, Food plate
- 1375 Yes, Food circle
- 1376 Yes, other, please specify
- 1377 Who is responsible for producing and revising your national FBDG?
- 1378
- 1379 Are the FBDG evaluated and monitored?
- 1380 yes no
- 1381 if yes, please specify:
- 1382 Please indicate and specify available references regarding your country (e.g. recommendations,
1383 reports, websites...):
- 1384 Please add any general or specific comment, you might have:
- 1385 Thank you very much for the time you spent to complete this questionnaire!

1386 ANNEX 2: RESULTS OF THE COMPUTERISED QUESTIONNAIRE (SEE ANNEX 1)

Q		yes	no
1.	Does your country have Food-Based Dietary Guidelines (FBDG)	11x	2x
2.	In what year were (the most recent) FBDG established	1994-2007	
3.	What is the origin of the FBDG used in your country		
a	translation of the CINDI dietary guide, WHO	1x	
b	translation of FBDG of other country	1x + CINDI	
c	specially developed for your country	9x	
4 ¹ .	Are diet-related health problems in your country taken into account when developing FBDG?	8x	1x
5 ¹ .	To which diet-related health problems your national FBDG are focused?		
a	Cardiovascular diseases	8x	
b	Dyslipidemia	5x	
c	Hypertension	6x	
d	Type 2 diabetes	6x	
e	Overweight/obesity	7x	
f	Osteoporosis	6x	
g	Constipation	1x	
h	Diverticular diseases	1x	
i	Iron deficiency anaemia	4x	
j	Iodine deficiency disorders	3x	
k	Dental caries	5x	
l	Malnutrition	0	
m	Others	eating dis. cancer	
6 ¹ .	What information was used to review food consumption patterns in your country?		
a	National food supply data	3x	
b	Household data	3x	
c	Individual food consumption data	8x	
d	other data? Please specify	3x	
7 ¹ .	Which dietary reference values (recommended daily allowances, nutrient based recommendations, etc.) were used in assessing adequacy of the diet?		
a	Not assessed	1x	
b	Values from own country	7x	
c	Values from own country and other country	1x	
8 ¹ .	What key nutrients were determined to be addressed by the FBDG in your country		
a	Energy	6x	
b	Total Protein	6x	
c	Plant Protein	3x	
d	Animal Protein	4x	

e	Total Fat	7x			
f	Saturated fatty acids	8x			
g	Monounsaturated fatty acids	6x			
h	Polyunsaturated fatty acids	6x			
i	Omega-6 fatty acids	6x			
j	Omega-3 fatty acids	7x			
k	Trans fatty acids	6x			
l	Cholesterol	5x			
m	Total Carbohydrates	6x			
n	Complex Carbohydrates	5x			
o	Total sugars	2x			
p	Added sugars	7x			
q	Dietary fibre	8x			
r	Water	3x			
s	Calcium	7x			
t	Iron	7x			
u	Sodium	5x			
v	Potassium	3x			
w	Magnesium	3x			
x	Selenium	3x			
y	Zinc	4x			
z	Other minerals	P, Cu, I (2x)			
aa	Vitamin A	4x			
ab	Vitamin B1	4x			
ac	Vitamin B2	4x			
ad	Niacin	4x			
ae	Vitamin B6	4x			
af	Folate	7x			
ag	Vitamin B12	4x			
ah	Vitamin C	5x			
ai	Vitamin D	6x			
aj	Vitamin E	4x			
ak	Other vitamins	0			
al	Other food components	alc (1x)			
9 ¹ .	Which food (groups) are finally included in your national FBDG				
a	bread, cereals	9x			
b	rice, pasta, potatoes	9x			
c	vegetables	9x			
d	fruit	9x			
e	legumes	7x			
f	milk and dairy products	9x			
g	meat	9x			

h	fish	9x			
i	eggs	5x			
j	oil/fats	8x			
k	nuts, seeds	4x			
l	Other food groups	water 1x; salt 1x			
		beverages 2x;			
		soft drinks 1x			
10 ¹	Before finalising FBDG did you make model diets, simulation studies etc?	3x		6x	
11 ¹	To which population groups are the FBDG in your country directed?				
a	General population	7x			
b	Elderly	4x			
c	Adult	6x			
d	Pregnant women	5x			
e	Adolescence	4x			
f	Schoolchildren	5x			
g	Pre-school children	5x			
h	Infants	3x			
i	Others	0			
12.	Are amounts of food quantified (recommended servings, portions or amounts)?	7x			
	(partly)	4x			
13.	Are other health related messages included in your FBDG?	8x		3x	
14.	Are food safety messages included in your FBDG?	6x		5x	
15.	Are other messages (e.g. food variety, meal pattern) included in your FBDG?	9x		2x	
16.	Were any of the food-based dietary guidelines field-tested before publication?	5x		6x	
17.	Are FBDG in your country accompanied by graphs of food selection guides?				
a	None	3x			
b	Food pyramid	3x			
c	Food plate	5x			
d	Food circle	3x			
e	Other	1 (key hole)			
18 ¹	Who is responsible for producing and revising your national FBDG?	6x National Institutes			
		(NI)/administrations			
		2x Ministry + NI			
		1x Ministry			

19.	Are the FBDG evaluated and monitored?	3x		8x	
¹ answers based on countries with specially developed FBDG (Q 3.3)					

1387