

1 April 2005

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Dear Jeff,

**Scientific Advisory Committee on Nutrition (SACN) Vitamin A Draft Report**

Thank you for the letter of 11 January 2005 inviting comments on the draft report. I have discussed the issue with colleagues at the Meat and Livestock Commission and this reflects our combined views.

MLC has a statutory responsibility to improve the efficiency of the GB Meat & Livestock sector having due regard to the interests of consumers. MLC operates under a federal structure reflecting devolution. Constituent members of the Federal MLC include the British Pig Executive (BPEX), the English Beef and Lamb Executive (EBLEX), Hybu Cig Cymru (HCC) and Quality Meat Scotland (QMS).

Overall, the recommendations in the draft report are balanced and proportionate. There are some sections of the report, however, which give cause for concern particularly in relation to the use of data from the National Diet and Nutrition Survey (NDNS).

*Liver consumption and retinol intakes*

The report indicates in paragraph 102 that NDNS, being based on 7 day diaries, may over or under-estimate the habitual intake of rarely consumed foods at an individual level (although estimates of the population mean intake should be reliable). This is a very important observation. Further, with no knowledge of the interval between independent consumption occasions of infrequently consumed foods, data collected in this way cannot be used to look at consumers of such a food as a separate group because it cannot be assumed that the sample week represents normal weekly intake for such foods.

This should be taken into account in the interpretation of these data for liver consumption and retinol intake. In particular the conclusions drawn on pages 20-21 should be considered extremely carefully. The calculated average retinol intakes for liver consumers is likely to be a considerable over-estimate, because not all those liver consumers will consume liver once a

week or more. Similarly the non-liver consumers in NDNS may well consume liver but no consumption occasion coincided with the sample week.

It is likely, therefore, that the contrast between these two groups is, in reality, not nearly as stark as presented in the report. In addition, no reliable estimate can be made of the percentage of consumers with retinol intakes above the defined threshold based on these data.

Scenario planning as set out in the report should also consider the effect of different possible distributions of liver consumption around the mean.

#### *Liver as a source of vitamin D*

The report on pages 16-19 examines the interaction between vitamin A and vitamin D and indicates an antagonistic effect. The vitamin D content of liver should therefore be taken into account when considering recommendations on liver consumption with respect to vitamin A.

In conclusion, the content of the report should be considered very carefully given the considerable uncertainty about the population distribution of liver consumption and, therefore, vitamin A intake. It is noted, however, that the way the recommendations related to liver consumption have been framed takes account of this uncertainty by addressing people on the basis of their individual behaviour in terms of liver consumption.

Thank you for the opportunity to comment on this issue. We would appreciate being kept informed of developments in this area.

Yours sincerely

**Kim Matthews**  
**Meat Scientist**