



Overview Part of the PbFA's Submissions to the Joint SACN/COT Working Group on Plant-based Drinks (excludes the technical elements)

The Plant-based Food Alliance, comprised of members from both businesses and NGOs, recognises that its individual business members producing plant-based drinks are best placed to provide the information on processing and manufacturing methods, product specifications, nutrient composition and micronutrient fortificants as is needed for SACN/COT working group. We have provided answers to the questions around Micronutrient Fortificants taken from information provided through our members as well as submitting the following broad points relating more broadly to the suitability of plant-based drink products and the processes around the call for evidence.

The shift to a more plant-based diet, including plant-based drinks as an alternative to cow's milk, is increasing and is reflected in national dietary recommendations in Europe. There are a number of reasons for this increase related to general healthy and lifestyle, dietary and ethical reasons however, a key reason relating to any work into health, and the need to recognise the role of plant-based drinks, is the fact that allergies to cow's milk is one the most wide spread allergy among infants and children. Additionally, lactose intolerance from bovine milk is widely observed in as much as [75% of the world's human population](#) and the NHS states that it is more common in people of [Asian or African-Caribbean descent](#). This means there is a need for plant-based drinks to be available as an alternative to cow's milk within public sector catering and as part of any Government schemes/initiatives, including the Healthy Start and Nursery Milk Scheme, to ensure an equal and fair offer to all including those from minority groups.

Aside from the health based necessity for some people to consume plant alternatives, as there are a growing number of people who are choosing plant-based diets for a range of reasons as mentioned above, it is therefore important for health and nutrition experts to support varied, balanced plant-based nutrition, including during critical periods of development and especially within the health promotion remit of the Government schemes. The new [Milk and Healthy Snack Scheme](#) in Scotland is an example of good practice. The Scottish government has agreed to include plant-based milk alternatives in government-funded nurseries and early learning milk schemes.

With [one in three people](#) drinking plant alternatives there is a real need to properly understand how they can be incorporated into a balanced, nutritious diet and for any studies to establish which plant drinks can work best for consumers. Different options of plant-milks can suit the varying needs and profile of the consumer. Soya drinks are considered as nutritional alternatives to dairy containing high quality protein. If the consumer is looking for a protein alternative beyond soya products, other protein drinks can be considered such pea protein drink. Plant-based drinks are available with varying energy/calorific content like cow's milk's offering of skimmed through to whole milk. Higher calorie and fortified oat milk is a good option for some consumers. It is also important to recognise that plant-based drinks with a lower content of protein can be highly valuable as part of a balanced varied diet offering e.g. vitamins, minerals, fibre and beneficial fat composition.

Aside from health, lifestyle, dietary or medical reasons, an important reason consumers choose plant-based drinks is based on environmental and sustainability concerns. Every Government department is required to support the Net Zero ambition and there have been a number of evidence based studies outlining the benefits of plant-based alternatives in tackling climate change and being more sustainable. An [independent report](#) for the UK Committee on Climate Change by Imperial College outlined that "lowering barriers to more plant-based diets is a theme, including broadening choice by making sure at least one plant-based option is available to anyone every day on all public-sector menus and training catering staff in plant-based cooking skills. More recently the latest [IPCC report](#) suggested eating less meat and more plant-based protein would result in a reduction in Greenhouse Gas Emissions and that it is one of the biggest individual contributions we can make to reducing emissions. There is strong support for the take-up of plant-based foods on environmental grounds and to consider the long-term role they play within our diets which need to be match with clear and helpful nutritional advice.

The reasons consumers choose plant-based drinks also drives their choice of the types of drink. Some may want to choose the one with the lowest environmental impact and some may want to choose the one with the highest nutritional content whereas some may simply want the most similar in taste to animal based dairy. The key factor to consider is how plant-based drinks fits into a varied balanced diet broadly and to support the connections between health and environment.

Evidence shows that the content of plant-based soya drinks and cow's milk are similar for most nutrients including similar protein quantity and quality, and calcium bioavailability. In Europe, most plant-based soya drinks are also fortified with vitamin D2 which is generally not the case for cow's milk. The government's [Eatwell Guide](#) officially recognises fortified plant milk as a suitable and nutritious alternative to animal milk. Fortification has enabled alternative drinks to provide good nutrition and support a balanced diet. Many plant-based drink producers are fortifying with calcium, iodine, riboflavin, vitamins B12 and D . Most plant-based drinks also contain fibre as well as a beneficial fat composition. The availability of fortified plant-based alternatives to milk with iodine has increased during recent years. It is concerning that the exclusion criteria (Table 1 of the Call for Evidence) exclude papers on the effects of fortification. Understanding the role of fortified plant milks would be very useful to both the public but also the Government for its wider agenda on health, environment and sustainability. The National Food Agency in Sweden, America's USDA, the UK's Eatwell Guide, the Wheel of Five in the Netherlands and the healthy living food triangle from Flanders all recommend fortified plant-based products as an alternative to dairy products.¹

The movement towards plant-based alternatives has led to permanent changes and the shift is particularly evident in younger people who are concerned about the environment, therefore it is important that we enable access to plant-based drinks fortified with calcium and vitamins as part of a healthy diet.

¹ https://pub.epsilon.slu.se/16016/1/roos_e_et_al_190304.pdf