



# EUROPEAN WHEY PRODUCTS ASSOCIATION

ASSOCIATION EUROPEENNE DES PRODUITS DE LACTOSERUM  
EUROPÄISCHER MOLKENPRODUKTEVERBAND

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## Comments of the European Whey Products Association (EWPA) on the content of the Commission Working Document on the adoption of a delegated Regulation on total diet replacement for weight control pursuant to Article 11 (1) of Regulation (EU) no 609/2013.

As the voice of the whey manufacturing industry in Europe, the EWPA appreciates the opportunity to comment on the content of the proposed delegated act and welcomes the proposal of the Commission in particular where it establishes a minimum of 75g of high quality protein per day for products for Total Diet Replacement for weight control (TDR).

Total Diet Replacements for weight control (TDR) are intended to be used by healthy overweight or obese adults who wish to lose weight and are generally regarded as an effective way to achieve weight reduction. The compositional advice of EFSA is based on widely accepted scientific evidence and it reflects the dietary advice that is widely considered efficacious.

The EFSA panel proposed a minimum protein content based on a Population Reference Intake for protein adjusted for the overweight or obese and set **at a minimum** 75g/day. Given the importance of high quality protein in the diet, particularly during weight loss the EWPA believes that setting the minimum protein content at 75g/day would ensure TDR products are safe and efficacious for their intended use. There is mounting evidence which shows that diets high in protein and including low glycaemic index carbohydrates promote weight loss, such as consistently shown in the findings of the pan-European programme "DIOGENES" which is targeting the obesity problem from a dietary perspective (<http://www.diogenes-eu.org>).

Milk proteins including whey proteins are high quality proteins which have a clean and acceptable taste. This neutral taste, along with the variety of speciality whey and dairy protein ingredients available, has always permitted for whey proteins to be incorporated into a wide variety of food applications at high concentrations delivering up to 100% of the energy of the food. This is the case for sports nutrition products where taste and cost are important factors, yet products such as protein shakes and protein waters provide all the energy from whey protein. Furthermore, certain TDR products currently on the market in Europe, already meet the minimum 75g protein/day based on a maximum energy intake of 600Kcal/day.

It is noted that the 2013 Report of the FAO Expert Consultation <sup>1</sup> recommended the adoption of the DIAAS method by Codex for the evaluation of dietary protein quality in human nutrition. Thus DIAAS could be a more appropriate method of evaluating protein quality in the case of total diet replacements for weight control, where weight loss can be supported best by high quality proteins.

While the increased content of high quality dairy protein could possibly increase the cost of the products, such products would still remain affordable taking into consideration that they replace the total diet (and therefore the cost of the total diet too).

The EWPA members are open to working together with manufacturers of TDR to find additional options and solutions for products which will ensure consumer choice and protection.

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<sup>1</sup> <http://www.fao.org/ag/humannutrition/35978-02317b979a686a57aa4593304ffc17f06.pdf>