

TESSA DITNER AMOROSI, UNIVERSITY OF THE ARTS LONDON - WRITTEN EVIDENCE (FDO0024)

Tessa Ditner Amorosi, PhD researcher, philosophy of language and conceptual ethics, Central Saint Martins, University of the Arts London.

I am submitting, in an individual capacity, evidence on the definition of ultra-processed food (UPF) and usefulness as terminology for describing and assessing such products (question 5).

Summary

- **Replacing or removing NOVA’s layered definition of UPF would make it difficult to navigate adjoining concepts such as ‘nutrition.’**
- **My research finds no convincing health-related evidence in food innovators’ communications to reject the concept UPF.**
- **‘Health’ and associated concepts face specific practical challenges that allow speakers to evade bodily health questions while still stating facts and truths.**
- **Bodily health sits alongside other ethically important goals (e.g. ecology, jobs, animal welfare); conceptual choice can devalue the health of the body over other values.**
- **The concept of UPF supports clarity of communication about ‘health’ and ‘processed.’ Seeking to further define it may play into the hands of those who try to reject the concept altogether in favour of prioritising other goals, or of narrow ‘healthier than food X given disease Y’ approaches.**

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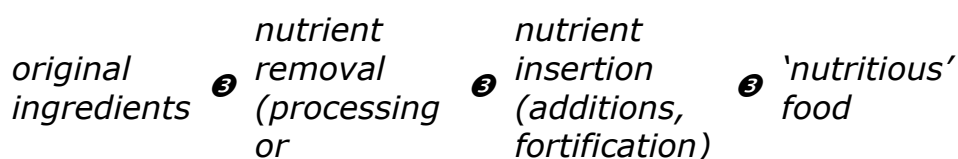
'Health', 'nutrition', 'processed' and 'ultra-processed'

1. My field of research is conceptual ethics, also called conceptual engineering. Within this field some of the concepts I explore are 'health', 'nutrition', 'processed' and 'ultra-processed.' This area of philosophy engages in conceptual critique, questioning whether concepts need reforming. It examines how "maybe some of the concepts we have inherited are defective, or at least not as good as they could be for our current purposes."¹ Conceptual engineers already consider a range of concepts worthy of analysis include 'slut,'² 'free will,'³ 'website,' 'human rights,'⁴ 'disabled' and 'Latinos.'⁵

2. My research focusses specifically on alternative protein innovation, looking across plant-based, hybrids and cell-based food research. I conclude that the rejection of 'processed' and 'ultra processed' has parallels with the reasons conceptual engineers suggest we no longer use slurs such as 'slut.' The reasons for rejecting the use of the terms/concepts is because they come with an additional negative framing, which is what they wish to reject. However, unlike with the above 'slut' example, when it comes to the concept 'ultra-processed food' (UPF), the rejection does not come with a straightforward discussion of the concept of UPF, but rather with additional 'language games' that impact understanding and analysis. These language games include distraction, replacing technical terms with an everyday term to suit a narrative, attacking associated concepts, using concepts within a restricted sense, as well as using concepts that restrict what can be said or thought. I provide examples below.

Nutritious

3. Professor Tim Spector, in his oral evidence on the concept of UPF, highlighted the overconsumption of dietary energy.⁶ NOVA describes this as "high glycaemic loads" and deranging "endogenous processes in the nervous system that signal satiety and control appetite."⁷ I would additionally highlight NOVA's explanation around the removal of nutrients: "what is done to foodstuffs and the nutrients originally contained in them, before they are purchased and consumed."⁸ Nutrient removal is potentially a simpler concept to consider than 'overconsumption' and makes clearer the relationship between UPF and nutrition. It also clarifies how food may be accurately called 'nutritious' despite being ultra-processed, especially if fortified. The focus on whether a food is 'nutritious' or not may distract from considering the effects of multiple intermediate steps, as visualised below:



*ultra
processing)*

4. To replace the concept of UPF with alternatives such as 'nutritionism' can distract attention away from whole food towards 'nutrition' which makes it difficult to discriminate between nutrition in UPFs and whole foods.⁹ I am not seeking to comment on the relative merits of whole food nutrition vs. fortification, merely pointing at how choice of language (concept choice) impacts the visibility or invisibility of processing activity.

5. A caricature of this ideas is: "If it doesn't work just call up Ingredient and get a functional ingredient added."¹⁰

Processed

6. NOVA's various categories (minimally processed, processed, ultra processed) usefully set up the concept of 'processed' to enable discussion of foods that are not ordinarily linked, such as biscuits, soda, hot dogs, etc. This generality of the UPF label is an advantage and resisting narrow definitions allows it to remain useful. Generality is not an uncommon practice, just as the concept 'game' is useful when not restricted to games with nets or with rackets.¹¹

7. 'Processing' is therefore not a slur or derogatory term but functionally useful. To 'process' (e.g. drying, non-alcoholic fermentation, chilling and freezing, pasteurization, vacuum-packing) is not of itself unhealthy and can increase the safety of food. Some processing of course (e.g. partial hydrogenation, adding sugar) contributes to negative health impacts.¹²

8. Everyday use of the term 'processed' to include 'ultra-processed' may be used as a shorthand instead of more precise information. 'Processed' may replace 'contains added sucrose' or 'contains high levels of salt'. Using 'processed' instead of these details may be considered less 'cognitively expensive' and be enough detail (depending on the conversational goals of speakers). Some food innovators may object to this common parlance (everyday) use of the term 'processed' (e.g. by the press) as it fails to highlight distinctions between 'better' and 'worse' ingredients, or to explain that some UPFs support specific ethical goals (e.g. animal welfare/ecology).¹³ Note: this committee with its targeted focus on bodily health could potentially ignore these arguments since it is, technically speaking, focussing on bodily health above other ethical considerations. This prioritisation structure may not be reflected in other conversations, including across government departments, for instance those that prioritise R&D or intellectual property in the food sector.

9. When speakers attempt to define 'ultra processed' in more specific ways, this tends to cause further confusion and results in a dismissal of the concept. Two examples are using 'junk food' which could be considered a slur, or 'analogue' which may wrongly be considered less

healthy than the food it aims to mimic. These examples are discussed below.

Junk

10. Some speakers may use 'junk food' instead of UPF.¹⁴ To call a food 'junk' may echo the work of thinkers that consider the "McDonaldization of Society" that sees speed and efficiency, predictability, calculability and control over uncertainty as being social goals that nevertheless have social costs. These costs are stated as being in the rituals within the home, nutrition and aesthetics, more specifically in the eradication of inefficient things including cooking, trees, hills and inefficient houses.¹⁵ A more recent explanation by food journalist Michael Pollan puts less emphasis on external forces and reminds us of our unhealthy appetite for "control and uniformity" in the form of a "perfect McDonald French fry", "gorgeous, slender, golden rectangles long enough to overshoot their trim red containers like a bouquet."¹⁶

11. I would add that reducing the concept of UPF to 'junk' food is not necessarily in line with how fast food joints are experienced, which includes low prices, late opening hours and familiarity which can be comforting. This also fails to be precise about the neutrality of the concept 'processed', therefore stripping 'junk food' companies of the chance to offer a variety of products that sit within different sections of the unprocessed to ultra-processed spectrum.

Analogue

12. Some may assume food analogues (plant-based cheese/meat, etc.) are UPF. Analogues are not always more processed than the foods they aim to replace. Some processed cheeses may be considered less healthy than a cashew cheese.¹⁷ To replace 'UPF' with 'analogue' could discourage innovation, and fail to offer clarity. 'Analogue' can become a flat conversation around 'real' and 'fake' which is not informative on the relative health merits of a food.

Bodily health vs. public health vs. free from disease

13. When the concept of 'public' is added to the concept of 'health', it allows speakers to shift from personal bodily health (e.g. gut health, weight) to refer to other measures of health such as being free of bacterial and viral pathogens. Bodies can be free of pathogens and still be unhealthy. This is problematic when 'public health' replaces 'health' in order to evade bodily health concerns, while still stating truths. In these cases, food innovators are using the concept of 'health' as a stand in for 'free from disease' (e.g. avoiding zoonotic diseases). This focus then also singles out specific diseases, such as cardiovascular disease (associated with meat-eating or insufficient vegetable intake) to discuss the health benefits of plant-based alternatives. This food is then presented as

healthy since it fits into the cardiovascular disease narrative that labels red meat as problematic. This may then recommend a processed food over another food (that may or may not be processed) (e.g. plant-based burger over red meat).¹⁸

14. When health discussion is restricted to 'healthier than food X given disease Y', ignoring a wide range of other factors including other diseases (e.g. inflammation), this creates a narrative of denigrating. For philosophers such as Gilbert Ryle, this kind of manipulation of language would be considered problematic since it defines exclusively using negatives. Ryle caricatured this with a description of what a 'mind' is: "minds are not bits of clockwork, they are just bits of not-clockwork."¹⁹ In this way, food items can be described with what appears to be informative health information while actually being devoid of it. Examples might be: 'clean', 'climate-smart' or 'animal-free'.

Health without 'health'

15. Health concepts and considerations can also be invoked without the word 'health' being implicitly used and therefore without actively stating falsehoods. This was discussed above with the concepts of 'clean', 'freedom from certain diseases' or 'avoidance of dangers'.

16. This is particularly the case where nature and/or our food system is depicted as diseased, poisonous or dangerous (e.g. mercury in fish,²⁰ food borne outbreaks and food safety,²¹ and antibiotic resistance²²). UPF narratives or narratives of control over food, may sit well within a wider narrative of depicting nature as dangerous and/or vulnerable. If these kinds of narratives are dominating (e.g. in the news) this may have the effect of implying that UPFs are healthier than their more dangerous natural counterparts.

Processed vs. processing

17. My research has explored how food innovators whose food is labelled 'ultra-processed' respond to the concept. *Beyond Meat* CEO Ethan Brown, for instance, considers the label a political move: "The plant-based meat industry currently suffers under the dark, poorly defined and politicised cloud of being a processed food [...] We must as a category unite around a single and powerful message that takes back the narrative of our processing ingredients, celebrates them and educates the consumer on the transformative health outcomes that are available through a plant-based diet that includes plant-based meat."²³ This and other compelling narratives can be analysed to show how the adjective 'processed' or 'ultra processed' (that describes a food that has gone through a process such as extrusion) is replaced by "our processing ingredients" which confusingly seems to just mean 'ingredients'. This draws attention to original ingredients away from the final, processed product.

18. *Beyond Meat* also addresses UPFs with: “processed and ultra-processed foods have been broadly categorized as being “bad for your health” over the last decade, when in reality, some of the most nutritious foods are all processed.” The list of food given is: “nut butters, protein powder, infant formula, hummus, salsa, bread, high-fibre cereals, whole grain pasta, and frozen vegetables.”²⁴ Both the statement and the accompanying list collapse the distinction between ‘ultra processed’ and ‘processed’ and ignores the purpose of the distinct terms. To collapse the distinction between processed and ultra-processed would be understandable if this were an everyday usage where the distinction between the two concepts is not relevant. I would, however, argue that in these examples this is not the case, and it demonstrates that continuing to draw attention to UPFs may be necessary, as the industry itself may try to actively avoid it. This is the case even, as I will discuss below, when the industry states it has valid ethical reasons to justify their innovations.

Competing frames restrict

19. Health can become confused in conversations where there are other ethical factors under consideration. The concept ‘health’ can take on a different meaning than ‘bodily health’ as in the concept ‘planetary health’, ‘healthy economy’, ‘health as security’ or ‘one health’, to include jobs, animal welfare, food resilience and ecology.²⁵ This becomes a question of priorities, where ‘bodily health’ may not be the top priority. Identifying that bodily health sits with other ‘goods’ justifies why some decisions may be taken that do not prioritise bodily health.

20. It would be a mistake, when confronted with these other concepts to wonder why audiences are not paying attention to bodily health, or to expect audiences to “wake up”. Sometimes these alternative ways of framing are issued to restrict an audience’s thinking.²⁶ Sanah Baig, Deputy Under Secretary for Research, Education, and Economics at the U.S. Department of Agriculture, for instance, frames alternative proteins within a ‘health as security’ conversation. Baig discusses how new food will “create wealth across the board”, “double production by 2050” and “build security”, while praising food innovators’ engagement with public policy.²⁷ This framed ‘health as security’ narrative highlights aspects of food that are also important and valuable but removes the focus from ‘bodily health’.

Concluding remarks

21. This submission has not covered the breadth of concepts used to describe or characterise health but aims to show a snapshot of the challenges faced when engaging with language and concepts. The way concepts work in practice does not highlight a failure of words or concepts. They do not require ‘fixing’ because they are often plastic, have vague boundaries, are adaptable or have context-specific meaning. This is

the reality of how concepts operate generally, convenient or inconvenient as this may be.

22. Everyday use of terms or casual language can be appropriate for ease of communication in contexts where precision would be unnecessary or inappropriate. For health nutrition researchers who commonly engage with how food companies use language, UPF is considered "the most important nutrition concept to come along since vitamins."²⁸ I have not seen any convincing health-related arguments from food innovators during four years of research in alternative protein, that would warrant getting rid of the concept of UPF.

23. I conclude that if further work is done to refine the definition UPFs, this should not involve a narrowing of information. Alternative terms such as 'health', 'nutrition' and 'processed' are problematic when it comes to clarity and can distract from truly considering health implications.

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