

THE NUTRITION SOCIETY - WRITTEN EVIDENCE (FDO0034)

The Nutrition Society

'The Nutrition Society, formed in 1941, is a diverse community with the independence and courage to challenge, question and progress forward the field of nutrition. Through a progressive approach that champions collaboration and breaking down research silos, we welcome members from around the world, regardless of their level of expertise. They however must have a genuine interest in pushing forward the field of nutrition for the benefit of people and animals, whilst balancing the health of our planet too.'

<https://www.nutritionssociety.org/about-nutrition-society>

The comments below have been compiled by a group of our Society's Trustees and have been approved by our Board of Trustees. However, inevitably amongst such a wide diversity of members (our Society currently represents 2300 members), there are likely to be differences of opinion.

HFSS Foods

As a Society we share the concerns of health professionals, nutritionists and government bodies regarding the burden and impact of overweight and obesity on human health and global economies. While the causes of obesity are complex, the current 'obesogenic environment' has clearly contributed to an imbalance between energy consumption and expenditure, resulting in weight gain at an individual and population level. The availability of affordable, energy dense foods, often High in Fat, Sugar and Salt (so called HFSS foods), appears to have disproportionately impacted on the most economically challenged sectors of our societies. While this has been recognised by successive UK governments, and some limited actions have been taken to reduce reliance on such foods, they continue to be a major driver of the obesity epidemic.

HFSS foods have frequently been referred to as 'Junk Foods'. For example, the National Food Strategy: The Plan (an independent review published by Henry Dimbleby in 2021, <https://www.nationalfoodstrategy.org/>) devotes a Chapter to 'Escaping the Junk Food Cycle'. While the Society supports many of the actions proposed by Dimbleby, we believe that some caution should be shown in demonizing foods that a significant proportion of our population are often economically dependent on and provide a convenient source of nutrition to those with limited cooking facilities, knowledge or time to devote to food preparation. We believe that a multifaceted approach with combined

efforts to reformulate such foods, alongside ensuring greater accessibility to healthy and more nutritious alternatives is likely to be more productive. Over the last decade the government has repeatedly discussed such alternatives, including further restrictions on marketing, and increasing pressures on the food industry (including further possible financial incentives). It is unfortunate that many of these initiatives (including 'watershed' restrictions on advertising and 'multi-buy promotions') continue to be delayed.

UPFs

Most recently, a large emphasis has been placed by the media on the potential impact of Ultra-Processed Foods (UPFs) on obesity, and health more generally. The definition most widely used of such food is that of NOVA, which defines UPFs as, '*Formulations of ingredients, mostly of exclusive industrial use, that result from a series of industrial processes (hence 'ultra-processed'), many requiring sophisticated equipment and technology*' (<https://doi.org/10.1017/S1368980018003762>). We recognise the fact that, within such a classification, there are a large number of HFSS foods and, as such, we should continue with efforts to reformulate such products to reduce the fat, sugar and salt contents, as well as reduce the reliance upon them as a major main part of the diet, particularly for some of the most vulnerable in society. However, in our opinion the NOVA classification of UPFs is far too broad and captures a range of healthy foods which can make important contributions to nutrient requirements (including packaged breads, breakfast cereals, unsaturated fat- rich spreads and dairy and meat alternatives).

Much of the current 'demonization' of UPFs is based on the results of recent systematic reviews and meta-analyses of the **associations** of diets rich in such products and a range of diseases. However, 'association' does not necessarily confirm a causal relationship. Most recently, more nuanced analysis within such association studies, where foods within the UPFs were considered individually, found associations with HFSS foods, but not with other healthier foods in this category (<https://pubmed.ncbi.nlm.nih.gov/38115963/>), supporting the approach, as noted earlier, to focus efforts on restricting availability and supporting reformulation of HFSS foods. Furthermore, recent analysis from the USA has shown that focusing only on UPFs misses out a significant proportion of foods that would be considered HFSS. There is currently a paucity of credible mechanistic evidence of the direct effects of processing, or specific ingredients (apart from fat, sugar and salt) of such foods, on health. More work is urgently required to disentangle the influence of multiple lifestyle factors (including displacement of healthier alternative foods) that are frequently associated with consumption of excessive amounts of UPFs. Several authors have focussed on the potential impact of specific ingredients of such foods (including sweeteners and

emulsifiers) on the microbiome of individuals consuming them, and the subsequent promotion of inflammatory disease, but this is at an early, mechanistic stage of research and currently we do not have enough evidence to suggest that consumption will have any impact on risk of disease or weight gain.

SACN

The Nutrition Society recognises the urgent need for further research to identify potential mechanisms for any effects of specific ingredients and strongly recommends that funding be allocated to these areas. In the meantime, caution should be shown in alienating the public, particularly many vulnerable individuals, from potentially healthy (and affordable) products, alongside HFSS foods. As such, the Society supports the recent findings of the SACN committee

(<https://www.gov.uk/government/publications/sacn-statement-on-processed-foods-and-health/sacn-statement-on-processed-foods-and-health-summary-report>):

- *“Assessment of the NOVA approach identified some concerns around practical application in the UK. In particular, the classification of some foods is discordant with nutritional and other food-based classifications.”*
- *“Consumption of (ultra-) processed foods may be an indicator of other unhealthy dietary patterns and lifestyle behaviours. Diets high in (ultra-) processed foods are often energy dense, high in saturated fat, salt or free sugars, high in processed meat, and/or low in fruit and vegetables and fibre.”*
- *“It is unclear to what extent observed associations between (ultra-) processed foods and adverse health outcomes are explained by established nutritional relationships between nutritional factors and health outcomes on which SACN has undertaken robust risk assessments.”*

Quality of Food Consumed in UK

On 20th June 2023, the House of Commons Library published a research briefing on ‘Obesity Policy in England’

(<https://commonslibrary.parliament.uk/research-briefings/cbp-9049/>).

This highlighted much of the government activity around the need to address the ‘obesity epidemic’ over the last decade. Much of the evidence reviewed in this report, together with the ‘National Food Strategy: The Plan’, already referred to, make it quite clear that urgent further action is required to improve the quality of food consumed in the UK. This is of particular concern for the most economically vulnerable, amongst whom obesity rates are highest.

We believe that, in general, wider adoption of a diet which adheres to The Eatwell Guide would have a significant impact on obesity rates in the UK. Guidelines

(https://assets.publishing.service.gov.uk/media/5ba8a50540f0b605084c9501/Eatwell_Guide_booklet_2018v4.pdf) include a significant increase in fruit and vegetable consumption, transitioning to a more plant-rich diet. Those consuming more than 90g of red or processed meat per day are recommended to cut down to no more than 70g/day. There is also an urgent need to increase fibre intake, alongside a decrease in high fat, salt & sugar -rich foods. However, to date that adoption of such dietary changes remains poor. For many, socio-economic shifts in working patterns have resulted in reduced time for cooking in many households and therefore nutritional scientists would welcome opportunities to work with industry food scientists and manufacturers to find ways to make foods healthier, rather than imposing unrealistic expectations on individuals. Overall, the required changes can be achieved only be through public health strategies at multiple food systems levels. Such actions are urgently required to address current levels of obesity and associated impacts on population health.

Summary

- The food industry and government must work together to ensure all demographics have access to a wide range of healthy, affordable foods, and are supported in restricting their intake of HFSS foods.
- We would urge the government to bring forward the implementation of restrictions on advertising of HFSS foods and multi-buy promotions.
- While, in principle, we would support an extension of the 'sugar tax' currently applied to soft drinks, to include a wider range of HFSS foods, this must be accompanied by financial incentives to supply, and consume, healthier alternatives.
- Continued investment is required to improve the school food system, which will include the provision of nutrition and food preparation education in schools, consideration of changes to enrolment processes and extension of eligibility to free school meals and development of further strategies to ensure greater availability of healthy alternatives to all pupils.
- Simultaneously, further research to investigate the potential impact of individual ingredients on health, requires urgent funding, while care should be taken over unnecessary demonization of a wide range of foods which currently provide nutritional resilience to many vulnerable consumers.

- Industry should be invited and actively encouraged to contribute to the development of such research and an environment of open and constructive collaboration should be created.

While noting that the call for evidence specifically excludes concerns about the impact on 'the environment of food', we believe that any future actions must address both health impacts and sustainability of the UK food systems.

4 April 2024