

# **THE VEGAN SOCIETY - WRITTEN EVIDENCE (FDO0072)**

## **Introduction to The Vegan Society Charity & Our Nutrition Team**

The Aims and Objectives of The Vegan Society include food justice: achieving a just world for humans, where no one goes hungry. We advocate plant-based food and other systems, for the benefit of all. We consider the food system as a whole in, the context of global environmental sustainability, as health, food consumption, food production and the environment are inextricably linked. We also support people to practice their vegan beliefs, and work to end exploitation of non-human animals.

We have made this submission because of the strong evidence that well-planned plant-based diets can significantly reduce a wide range of health risks from heart disease, high blood pressure and unhealthy cholesterol, to type 2 diabetes.

The Vegan Society have been working with Registered Dietitian advisors since before 2007, and in-house Registered Dietitians forming our nutrition team for the past decade. Our Registered Dietitian colleagues put forward a consistent case for plant-strong diets to at the forefront of public health strategies around food, to increase fibre, fruit and vegetable intakes and reduce saturated fat, free sugars and salt.

Our Nutrition Team are currently Andrea Rymer R.D. and Emily McKee R.D., who variously have specialist knowledge including hospital food services, renal dietetics, gastroenterology, clients with learning disabilities, and existing weight-related dietetic methodologies. As part of The Vegan Society, our nutrition team share sound, evidence-based information on plant-based nutrition with individuals, service providers, dietetic and health-care colleagues, policy-makers and other relevant organisations in the UK and beyond:

<https://www.vegansociety.com/resources/nutrition-and-health>

The Vegan Society is a Registered Charity [Registered in England and Wales (Reg. Charity No: 279228) and in Scotland (SC049495)], a Membership Organisation, and a company limited by guarantee with no share capital (Company Reg. No: 01468880 and 12377572 (England and Wales)).

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## **0. Summary**

0.1 To achieve the stated goals of improving health outcomes of children and adults, particularly amongst distinct demographic groups currently disproportionately living with poor health, we need a fair, affordable plant-based food system transition from production and distribution, to access and consumption.

0.2 The Vegan Society challenges a health system overly focused on unhelpful concepts of 'Body Mass Index', 'obesity' and 'overweight' and supports focusing on overall 'health' rather than 'size', with a transition to a plant-based food system.

0.3 The UK should be focusing upon empowering every person to have secure access to sustainable, healthy, culturally appropriate plant-based food as the default, in order to improve health outcomes.

0.4 Health and food policies must be evidence based. The evidence suggests that we need to reduce the focus on weight exclusively – including concepts such as overweight, obesity and BMI – in policy and practice goals and implementation.

0.5 Population weight gain is occurring in conditions of growing 'health consciousness', meaning that although the UK population is more health conscious, concern about average recorded weight for many demographics is increasing.

0.6 We require a paradigm shift, based on the principles of a whole-system approach. We need to reshape social, cultural and business environments, as well as the physical and food environments in communities. The British Dietetic Association, the UK's regulated body for experts in the links between diet and health, "condemn .. the use of stigmatising language, images, attitudes, policies, and weight-based discrimination, wherever they occur." The Vegan Society supports a focus on overall 'health' rather than 'size', and ready access to plant-based, healthy foods for everyone.

0.7 We must embed in policy, practice and leadership, a plant-based food system which means expanding the vision of this consultation.

0.8 Plant-based diets are associated with many health benefits. When people follow a vegan diet, they often eat more fruit and vegetables and enjoy meals higher in fibre and lower in saturated fat, than a traditional UK diet. There is evidence that plant-based diets may be beneficial for the prevention of type 2 diabetes and cardiovascular disease in the general

population. Cardiovascular diseases are the leading global cause of death, and a leading cause in England, accounting for c. 32% of all global deaths in 2019, and c. 26% in England in 2022.

0.9 Therefore, we need a top-down promotion of healthy plant-based diets by public health campaigns, with provision of healthy plant-based food as the default on public sector menus, using the power of public procurement to promote healthier and more sustainable options.

0.10 Because sustainable, healthy plant-based and vegan-friendly foods are still not the default, people who avoid things taken from animals for health or medical needs, and/or for religious and philosophical belief reasons, tend to face extra barriers to health and food sovereignty.

0.11 It is clear that multiply marginalized (especially Black/African, and Disabled) and impoverished communities in England are suffering most from diet-related ill health. Therefore, we must directly empower them to always have access to healthy, sustainable diets including plant-based vegan-friendly diets.

0.12 The Vegan Society promotes plant-based diets founded on a variety of whole plant foods such as pulses, nuts and seeds, whole grains, fruit and vegetables to meet nutritional needs and optimize health.

0.13 The label 'ultra processed' itself is not very helpful for classifying the health profile of foods because the ingredients are more important than the method of processing. Family staple foods (such as breakfast cereals & bread) need vitamin and mineral fortification so they are more nutrient dense. Along with plant-based alternatives to animal products these are vital foods for households who are seeking healthier options but are impoverished in time and financial resources. Thus, the narrative of 'ultra-processing' needs to change, and more attention paid to nutrient profile than processing. We need to embrace affordable, culturally acceptable, and accessible fortified foods for the nutritional health benefits they offer.

0.14 Making the transition to plant-based food system has huge potential to not just improve individual health but improve the health system more widely. The Office of Health Economics estimates that 100% adoption of plant-based diets in England could save the NHS around £6.7 billion per year. The British Dietetic Association reports that the consequences of poor nutrition in the UK were already costing the UK over £6 billion per year in 2015.

## **Q1. Key trends in food, diet and obesity, and the evidential base for identifying these trends.**

1.1 The Vegan Society challenges a health system overly focused on unhelpful concepts of 'Body Mass Index', 'obesity' and 'overweight' and supports focusing on overall 'health' rather than 'size', with a transition to a plant-based food system. Disproportionate focus upon individuals with high Body Mass Index (BMI) is increasingly widely understood to lack nuance, to give no reliable indication of a person's health, and to not be applicable to most individuals

1.2 Health policies that focus solely on weight crucially neglect the empirical evidence that good health is possible at many different sizes, that it's unclear if long-term weight loss is widely achievable, and that significant weight does not consistently improve (and can even harm) health ('An Evidence-Based Rationale for Adopting Weight-Inclusive Health Policy' Hunger, Smith & Tomiyama 2020 <https://doi.org/10.1111/sipr.12062>).

1.3 The Vegan Society identify another key trend as continuing over-reliance on producing and serving animal-based foods in policy and practice for farming, subsidies, public procurement, catering, retail and our homes.

1.4 Plant-based diets are associated with many health benefits. When people follow a vegan diet, they often eat more fruit and vegetables and enjoy meals higher in fibre and lower in saturated fat, than a traditional UK diet. Both the British Dietetic Association and the NHS affirm that well-planned vegan diets can support healthy living in people of all ages.

1.5 Plant-based diet patterns, especially when they include with healthful plant-based foods, may be beneficial for the prevention of type 2 diabetes and cardiovascular disease in the general population. Cardiovascular diseases are the leading global cause of death, and a leading cause in England, accounting for c. 32% of all global deaths in 2019, and c. 26% in England in 2022. Importantly, not all plant foods are equally beneficial, but refined carbohydrates, added sugars, and oils should be avoided. Replacing meat and dairy with whole grains, beans, nuts and healthy oils may significantly reduce cardiovascular disease and type 2 diabetes, according to a major review into the impact of diet on health ('Substitution of animal-based with plant-based foods on cardiometabolic health and all-cause mortality: a systematic review and meta-analysis of prospective studies' Neuenschwander et al. 2023 BMC Med 21, 404, <https://doi.org/10.1186/s12916-023-03093-1>).

1.6 Plant-based diets are increasingly popular. The Vegan Society found in 2022 that over half of people in the UK would try vegan-suitable foods and diets, as long as they are more cost-effective than animal-based alternatives ('Attest' survey, April 2020, <https://www.vegansociety.com/news/news/third-shoppers-report-reducing-or-ditching-meat>). UK average meat consumption has slowly decreased to c. 1kg per week in 2022, the lowest since records began in 1974 (from the UK National Diet and Nutrition Survey, <https://www.gov.uk/government/collections/national-diet-and-nutrition-survey>). People choosing plant-based alternatives to animal-derived foods in the UK roughly doubled in the decade to 2019, to c. 13 % (from the UK Family Food Datasets, <https://www.gov.uk/government/statistical-data-sets/family-food-datasets>).

1.7 Therefore the UK food, care and health systems need to urgently, proactively support the plant-based transition.

1.8 By embracing the growing popularity of plant-based food, and empowering more people to choose it, our 2023 research with the Office of Health Economics shows that people could gain up to 172,735 QALYs (Quality-Adjusted Life Years) in England ('The impact of higher uptake of plant-based diets in England: model-based estimates of health care resource use and health-related quality of life' Henderson & Sampson 2024 in prep. doi: <https://doi.org/10.1101/2023.12.26.23300536>). This could save NHS England around £6.7 billion / year and bring net benefit of c. £18.8 billion (one QALYs = £70,000).

1.9 Fadnes, L.T. et al. (2023) find that 'Life expectancy can increase by up to 10 years following sustained shifts towards healthier diets in the United Kingdom' based on high consumption of whole grains, fruit, vegetables, nuts and legumes (Nature Food, 4, pp. 961–965. Available at: <https://doi.org/10.1038/s43016-023-00868-w>).

1.10 Therefore, the UK should be empowering every person to have secure access to sustainable, healthy, culturally appropriate, plant-based food.

1.11 We need to address increasing malnourishment in England. Of concern are the macronutrient dietary fibre, as well as key micronutrients such as vitamin D, vitamin B12, carotenoids, folate, vitamin C, iron and omega 3 and 6 essential fatty acids. These are all important alongside a healthy balance in carbohydrate, protein and fat.

1.12 The continued excess of animal-based foods in typical UK diets is contributing to unhealthy levels of animal protein and animal fat intake on average, and insufficient dietary fibre, folate, vitamin C and omega 3 & 6

essential fatty acids. A majority of people in England are not currently consuming enough dietary fibre, and many are consuming excess saturated fats and proteins.

1.13 A fundamental trend is that multiply marginalized people are disproportionately and increasingly finding themselves forced into impoverishment, food insecurity and malnourishment. Multiply-marginalized households with children are particularly prone to be malnourished in terms of healthy macro- and micro-nutrients, even when the children are gaining weight (Food Foundation Food Insecurity Tracking <https://foodfoundation.org.uk/initiatives/food-insecurity-tracking#tabs/Round-14>).

1.14 Multiply marginalized households face huge barriers to adopting healthy, plant-based food practices. For example, the National Diet and Nutrition Survey shows that vitamin D intake and status significantly decrease with decreasing income in almost all age groups, making appropriate supplementation essential for the whole population. In the case of vitamin D, intake decreases by c. 5% for every £10,000 decrease in equivalised income. Since 2016, the experts at the British Dietetic Association (BDA) and the UK Scientific Advisory Committee on Nutrition (SACN) have been advising, “everyone is recommended to take a supplement, especially during autumn and winter.” Insufficient vitamin D is associated with a wide range of health issues, and vitamin D supplementation in combination with calcium reduces all-cause mortality risk.

1.15 All of the above evidence supports our position, which is, to achieve the stated goals of improving health outcomes of children and adults – particularly amongst distinct demographic groups currently disproportionately living with poor health – we need a fair, affordable plant-based food system transition. This must include affordable access to crucial fortification and/or supplements such as vitamin D. □

## **Q2. The primary drivers of obesity both amongst the general population and amongst distinct population and demographic groups.**

2.1 The primary drivers of poor nutrition are impoverishment, and the industrial farming of animals, both indicating failures in fiscal policy. The result is an oversupply of subsidised saturated fats, as well as protein, with diets seriously lacking in fibre. UK land and other resources that could grow healthy plant-based protein and other foods, are also misdirected into industrial farming of animals and associated feed crop production. The Vegan Society research project, Planting Value in Our Food System (<https://www.plantingvalueinfood.org/>), draws on insight from experts across the UK food system into policies which can reverse these destructive trends.

2.2 Because plant-based and vegan-friendly foods are still not the default, people who avoid things taken from animals for health or medical needs, and/or for religious and philosophical belief reasons, tend to face extra barriers to food sovereignty.

2.3 The lack of food sovereignty – food insecurity – is strongly related to poor nutrition in the UK. For example, the FIO Food project documents how socially disadvantaged groups & households are disproportionately malnourished due to impoverishment.

2.4 The Child Poverty Action Group notes that Government figures (<https://www.gov.uk/government/collections/households-below-average-income-hbai--2>) show that one in three children in the UK are living in impoverished households, meaning almost four million impoverished children in England. The Food Foundation's 2024 data confirm that roughly 6.7 million adults in England (8 million in the UK) experienced food insecurity in January 2024, of whom 2.5 million adults in England (3 million in the UK) went a whole day without eating (<https://foodfoundation.org.uk/initiatives/food-insecurity-tracking#tabs/Round-14>). Food insecurity increases with marginalisation: households which simultaneously have at least one child under four, only one adult, are in receipt of Universal Credit, are Black or African, and also, have at least one high support needs Disabled member, have up to a four in five chance of being food insecure.

2.5 In the UK, Government figures (<https://www.gov.uk/government/collections/households-below-average-income-hbai--2>) prove that food insecurity and poor nutrition is more prevalent in the lowest income quintile: there are clear socioeconomic gradients. Policies need to focus on socioeconomic inequalities, and

reduction of health inequality across individual, community and societal levels.

2.6 To achieve the stated goals of improving food-related health outcomes of children and adults – particularly amongst distinct demographic groups currently disproportionately living with poor health – we need a fair, affordable plant-based food system transition.

2.7 For those in the most impoverished demographics, we need to empower them to choose healthy plant-based food, which should also be subsidised to increase affordability. We need good, healthy, appetising plant-based meals to be available on every public sector menu, to increase uptake. We need public health campaigns to clearly set out the benefits of healthy plant-based dietary patterns. We need those in leadership to adopt and promote healthy plant-based food in every context.

### **Q3. The impacts of obesity on health, including on children and adolescent health outcomes.**

3.1 The Vegan Society challenges a health system overly focused on unhelpful concepts of 'Body Mass Index', 'obesity' and 'overweight' and supports focusing on overall 'health' rather than 'size', with a transition to a plant-based food system. There is increasing recognition amongst health professionals, including Registered Dietitians – the UK's regulated experts on the links between diet and health – that Body Mass Index (BMI) and its derived concept 'obesity' are not reliable measures of health for most individuals.

3.2 Rather, it is the lack of food security which is the main link between diet and health. The impact of food insecurity on health are potentially life-long and life-limiting.

3.3 However, vegan-suitable diets and plant-based foods by default tends to lead to higher consumption of vegetables and other healthy foods. Thus, a plant-based food system is associated with more affordable and better nutrition, and reduced risk of disease.

3.4 The UK should be focusing upon empowering every person to have secure access to sustainable, healthy, culturally appropriate food including plant-based and vegan-friendly foods for all.

### **Q4. The influence of pre- and post-natal nutrition on the risk of subsequent obesity, and the specific influences on the diet of children and adolescents that contribute to the risk of becoming obese.**



4.1 The Vegan Society challenges a health system overly focused on unhelpful concepts of 'Body Mass Index', 'obesity' and 'overweight' and supports focusing on overall 'health' rather than 'size', with a transition to a plant-based food system. There is increasing recognition amongst health professionals, including Registered Dietitians – the UK's regulated experts on the links between diet and health – that Body Mass Index (BMI) and its derived concept 'obesity' are not necessarily reliable measures of health for most individuals.

4.2 Well-planned plant-based, vegan-suitable diets have huge potential for tackling food-related health challenges. But currently, those choosing to adopt plant-based diets – whether as a philosophical belief, or for health or other reasons – are systematically disadvantaged.

4.3 Government health messaging and initiatives including the Healthy Start scheme do not give plant-based and vegan inclusive options. Healthy Start schemes to help people during pregnancy, and who are caring for young children already have low uptake due to complexity, and lack of automatic enrolment. Furthermore, Healthy Start vouchers give access to cow's milk and cow's milk infant formulas only, excluding nutritious unsweetened fortified plant milks and infant formulas. The Healthy Start vitamin scheme contains only animal-derived vitamin D, and not the available vegan-suitable plant-based vitamin D2 & D3. Moreover, Food Foundation data from 2023 shows (<https://foodfoundation.org.uk/childrens-right2food-dashboard#tabs/Government-Programmes/Healthy-Start>) that only two (2) of the 533 Parliamentary Constituencies in England have reached the 75% uptake target for Healthy Start set by Government. Key barriers include over-complicated procedures to access the support, lack of awareness and lack of appropriate promotion of Healthy Start (Moonan et al. 2022, <https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-022-12704-0>).

4.4 All these barriers must be systematically dismantled and removed.

4.5 The Vegan Society have developed a Vegan Eatwell Guide ([https://www.vegansociety.com/sites/default/files/uploads/downloads/The%20Vegan%20Eatwell%20Guide\\_2.pdf](https://www.vegansociety.com/sites/default/files/uploads/downloads/The%20Vegan%20Eatwell%20Guide_2.pdf)) that parallels the UK's Eatwell Guide, as well as a vegan suitable vitamin and mineral supplement named VEG 1 Baby and Toddler (<https://www.vegansociety.com/shop/veg-1-supplements/veg-1-baby-toddler>), that meets government recommendations for children from 6 months to 4 years. VEG 1 Baby and Toddler contains vitamins A, C, D and other nutrients less abundant in foods in England (iodine, selenium) and plant-based foods (vitamin B12). Including the Vegan Eatwell Guide where appropriate, and VEG 1 Baby

and Toddler in childhood nutrition initiatives has huge transformative potential for healthy lifestyle modification.

4.6 It is well established that food insecurity during gestation, as well as after birth before and after weaning, can result in low birth weight and stunting, respectively. Prospective biological parents are often unable to access, or are not following, nutritionally optimal diets before conception. Many pregnancies are also unplanned. This is why the mandatory fortification of UK flour with folic acid has been agreed by government, to reduce the incidence of health problems associated with folic acid insufficiency, such as spina bifida.

4.7 We also know that optimal feeding of newborn babies with human milk, including six months exclusively and alongside appropriate complementary foods until two years, protects against food-related health problems. Well-planned plant-based diets can support the adults producing human milk, too.

4.8 Food insecurity before, during and after pregnancy increases the risk of metabolic disease, as does rapid weight gain after two years of age. When we are unable to feed the children in our care by responding to their intrinsic hunger and satiety cues, this can also contribute to unhealthy eating patterns in later life.

4.9 All the data proves that healthy diet and lifestyle are vital for anyone who may become a parent, to support the long-term health of their children. Family planning clinics, GPs, midwives and other health care professionals involved in pre- and post-natal healthcare should always be well-equipped in promoting healthy lifestyle advice. This should include the Healthy Start scheme, which aims to help tackle health inequalities in a demographic (those who are or may become pregnant, and those in lower income quartiles) that are already susceptible to health problems associated with poor nutrition.

4.10 Empowering everyone to optimise their diet if they could become a parent, as well as during pregnancy and in the crucial first six months and two years of life when infants need human milk, can be transformative. Well-planned vegan-suitable and plant-based diets can supply optimal nutrition for everyone, including prospective, pregnant and feeding parents, and their infant, young and adolescent children. Our Registered Dietitians set out optimal plant-based nutrition guidance for each age and life-stage here: <https://www.vegansociety.com/resources/nutrition-and-health/life-stages>.

## **Q5. The definition of a) ultra-processed food (UPF) and b) foods high in fat, sugar and salt (HFSS) and their usefulness as terminologies for describing and assessing such products.**

5.1 The Vegan Society affirms the growing consensus that the term, 'ultra-processed food' is generally unhelpful, as it lacks nuance about the nutritional value of a given food.

5.2 A wide range of processing techniques are of course important to increase the nutritional value and bioavailability of many foods, as well as the accessibility of food to many people.

5.3 The term, 'high in fat, sugar and salt' needs to be modified to recognise whole plant foods which intrinsically contain (largely unsaturated) fats including essential Omega 3 & 6 fats, and sugars, alongside dietary fibre, protein and vital micronutrients, as distinct from free sugars and saturated fat. The Vegan Society continue to recommend a healthy intake of unsaturated fats, especially from whole plant foods, and for people to focus on reducing saturated fats. Food labels show saturated fats separately from overall fat content. Low fat diets are no longer the 'gold standard' for cardiovascular health. A healthy fat intake from a whole-plant-centred diet with a high ratio of unsaturated fat to saturated fat is much more protective against cardiovascular disease than low total fat (European Food Safety Authority 2010, <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2010.1461>).

5.4 Evidence is accumulating that health risks are associated with artificially and sugar-sweetened beverages, with animal meat, milk and egg-based foods (including processed meats), and with condiments. In contrast, cardiovascular disease, type 2 diabetes and cancer are not proving to be associated with foods such as breads and cereals, sweets and desserts, savoury snacks, and plant-based alternatives to animal meat, milk and egg-based foods (Neufingerl & Eilander, 2023 'Nutrient intake and status in children and adolescents consuming plant-based diets compared to meat-eaters: a systematic review' <https://doi.org/10.3390/nu15204341>).

5.5 The Vegan Society's recent research shows that widespread adoption of plant-based diets – including plant-based alternatives to animal meats, milks and eggs – will produce substantial savings for NHS England. We could gain up to 172,735 QALYs (Quality-Adjusted Life Years) in England). This could save NHS England around £6.7 billion / year and bring net benefit of c. £18.8 billion (one QALYs = £70,000; 'The impact of higher uptake of plant-based diets in England: model-based estimates of health care resource use and health-related quality of life' Henderson & Sampson 2024 in prep. doi: <https://doi.org/10.1101/2023.12.26.23300536>).

5.6 We emphasize that, in particular, the NOVA classification of 'ultra processed foods' is significantly flawed. NOVA fails to account for different ingredient & nutrient profiles, and processing methods putting very different foods into one unhelpful 'ultra processed' category.

5.7 The Vegan Society notes that The British Nutrition Foundation does NOT recommend using the NOVA system, including the concept of 'ultra processed foods', in dietary guidelines. Other systems such as NutriScore (The Nutri-Score: A Science-Based Front-of-Pack Nutrition Label [https://www.iarc.who.int/wp-content/uploads/2021/09/IARC\\_Evidence\\_Summary\\_Brief\\_2.pdf](https://www.iarc.who.int/wp-content/uploads/2021/09/IARC_Evidence_Summary_Brief_2.pdf)) which consider the nutrient profile of foods in more detail, are likely more helpful to quantify the health risks or benefits of individual foods (The concept of 'ultra-processed foods' (UPF) Position statement April 2023 <https://www.nutrition.org.uk/media/e03bou0g/upf-position-statement-25-05-23.pdf>).

5.8 The Vegan Society is currently engaging with the debate on 'ultra-processed' food through several avenues. To summarise:

5.8.1 We support plant-based diets centred upon varied whole plant foods e.g. pulses, nuts & seeds, whole grains, fruit & vegetables (including mushrooms), herbs & spices to meet nutritional needs and optimize health.

5.8.2 The label 'ultra processed' (UPF) is not very helpful to show food health profiles; the ingredients are more important to focus on than the processing.

5.8.3 Many plant-based, vegan-suitable staples are whole foods or minimally processed e.g. frozen, dried, canned.

5.8.4 The evidence shows that plant-based meat alternatives can form part of a healthy diet: they have better nutritional content, and support improved cardiovascular health outcomes, than meat-based alternatives (Neufingerl & Eilander, 2023 'Nutrient intake and status in children and adolescents consuming plant-based diets compared to meat-eaters: a systematic review' <https://doi.org/10.3390/nu15204341>).

5.8.5 People need to check the specific nutritional information on food packing, and choose products that are low in salt, free sugars and saturated fat.

**Q6. How consumers can recognise UPF and HFSS foods, including the role of labelling, packaging and advertising.**

6.1 The Vegan Society affirms the growing consensus that the term, 'ultra-processed food' (UPF) is generally unhelpful, as it lacks nuance about the ingredients & nutritional value of a given food. Systems such as NutriScore, which consider the nutrient profile of foods in more detail, are likely more helpful to quantify the health risks or benefits of individual foods.

6.2 In terms of recognizing 'high in (saturated) fat, (free) sugars and salt' foods (HFSS) foods, the British Dietetic Association (BDA, the UK professional body for registered dietitians) has resources to help consumers make healthier choices when choosing packaged foods: <https://www.bda.uk.com/resource/food-labelling-nutrition-information.html>.

6.3 The Vegan Society supports food-system wide improvements to increase reformulation of foods to reduce salt, free sugars and saturated fats, including lightly processed plant proteins and other plant-based ingredients for healthier food profiles.

6.4 However, labelling, packaging and advertising need to be just one part of overall food systems changes which empower every person to have secure access to sustainable, healthy, culturally appropriate food including plant-based and vegan-friendly foods for all. □

## **Q7. The cost and availability of a) UPF and b) HFSS foods and their impact on health outcomes.**

7.1 The Vegan Society affirms the growing consensus that the term, 'ultra-processed food' (UPF) is generally unhelpful, as it lacks nuance about the ingredients & nutritional value of a given food. Systems such as NutriScore, which consider the nutrient profile of foods in more detail, are likely more helpful to quantify the health risks or benefits of individual foods.

7.2 The term, 'high in fat, sugar and salt' needs to be modified to recognise whole plant foods which intrinsically contain (largely unsaturated) fats including essential Omega 3 & 6 fats, and sugars, alongside dietary fibre, protein and vital micronutrients, as distinct from free sugars and saturated fat.

7.3 The Vegan Society continue to recommend a healthy intake of unsaturated fats, especially from whole plant foods, and for people to focus on reducing saturated fats. Food labels already show saturated fats separately from overall fat content. Low fat diets are no longer the 'gold standard' for cardiovascular health.

7.4 However, more than this, we need overall food systems changes which empower every person to have secure access to sustainable, healthy, culturally appropriate food including plant-based and vegan-friendly foods for all.□This means comprehensively addressing socioeconomic factors, including through subsidies for plant-based foods and public procurement ensuring good plant-based and vegan-friendly meals on every menu, as well as ending food 'deserts'. □

## **Q8. The role of the food and drink industry in driving food and diet trends and on the policymaking process.**

8.1 The Vegan Society works with a wide range of food and drink companies in England, through The Vegan Trademark scheme which we run: <https://www.vegansociety.com/the-vegan-trademark>. We believe the food and drink industry has a crucial role to play in creating food that promotes good health.

8.2 Our partners making food and drink products which are registered with The Vegan Trademark are already supporting moves to increase the consumption of foods rich in vegetables, fruits and other plant foods. Such vegan-suitable, plant-based foods generally support lower intakes of saturated fats, and higher intakes of dietary fibre, plant proteins, essential Omega 3 & 6 fats, and other valuable micronutrients such as vitamin C found in useful quantities only in plants.

8.3 Therefore, food and drink industry will play key roles in overall food systems changes which empower every person to have secure access to sustainable, healthy, culturally appropriate food including plant-based and vegan-friendly foods for all.□The food and drink industry must support farmers, public sector procurement, health bodies and everyone else to embrace and accelerate these trends towards a healthy plant-based food system.

## **Q9. Lessons learned from international policy and practice, and from the devolved administrations, on diet-related obesity prevention.**

9.1 The Vegan Society challenges a health system overly focused on unhelpful concepts of 'Body Mass Index', 'obesity' and 'overweight' and supports focusing on overall 'health' rather than 'size', with a transition to a plant-based food system. There is increasing recognition amongst health professionals, including Registered Dietitians – the UK's regulated experts on the links between diet and health – that Body Mass Index (BMI) and its derived concept 'obesity' are not necessarily reliable measures of health for most individuals.

9.2 Public health measures which are focused upon weight-loss interventions rarely achieve long-term health improvements (Hafekost et al. 2013 <https://link.springer.com/article/10.1186/1741-7015-11-41>). We can no longer afford such failed policies, which ignore the systemic failings in our food system, as well as the genetic and homeostatic mechanisms determining our body compositions.

9.3 To improve how our food system supports health for everyone, we must adopt approaches which have a track record of success, such as those outlined by Hafekost et al. 2013 including:

9.3.1 Regular fruit and vegetable consumption is associated with lower mortality in multiple studies across the globe: we need plant-based and vegan-friendly food choices to be the affordable, accessible default options;

9.3.2 We need to dismantle systematic barriers and empower people to expand upon and put into practice their existing knowledge about healthier food choices, and to adopt plant-based diets;

9.3.3 In the USA large-scale survey research has found that positive messaging - alongside empowering people to access healthier foods, - helps motivate long-term health improvements;

9.3.4 Embracing the evidence that people can be healthier with a range of body composition, and avoiding weight stigma, can help improve markers of cardiovascular disease such as high harmful LDL cholesterol, and increase persistence with healthier diet changes;

9.3.5 The scientific literature indicates that the weight-centric approaches are ineffective or even contribute to poor health outcomes.

9.4 The UK should be focusing upon empowering every person to have secure access to sustainable, healthy, culturally appropriate food including plant-based and vegan-friendly foods for all.

### **Q10. The effectiveness of Government planning and policymaking processes in relation to food and drink policy and tackling obesity.**

10.1 Public health measures which are focused upon weight-loss interventions rarely achieve long-term health improvements (Hafekost et al. 2013 <https://link.springer.com/article/10.1186/1741-7015-11-41>). We can no longer afford such failed policies, which ignore the systemic failings in our food system, as well as the genetic and homeostatic mechanisms determining our body compositions.

10.2 The Vegan Society challenges a health system overly focused on unhelpful concepts of 'Body Mass Index', 'obesity' and 'overweight' and supports focusing on overall 'health' rather than 'size', with a transition to

a plant-based food system. There is increasing recognition amongst health professionals, including Registered Dietitians – the UK’s regulated experts on the links between diet and health – that Body Mass Index (BMI) and its derived concept ‘obesity’ are not necessarily reliable measures of health for most individuals.

10.3 Rather, we need a plant-based transition throughout our food system, so UK-grown legumes, vegetables, fruits and other crops are supported by public food procurement across UK institutions. An immediate step would be to require good plant-based and vegan-suitable meals as the default on every public sector menu every day in England, as The Vegan Society Catering for Everyone project sets out: <https://www.vegansociety.com/get-involved/campaigns/catering-everyone>.

10.4 School interventions are important because they help lay the foundations for better health for the upcoming generations, and because young people and school staff can help positively influence their households, extended families and wider communities too. The ‘Interventions for preventing obesity in children’ Cochrane review (Brown et al 2019 Cochrane Database of Systematic Reviews <https://www.cochranelibrary.com/cdsr/doi/10.1002/14651858.CD001871.pub4/full>) suggest the following will be promising strategies for schools:

10.4.1 Better nutritional quality school food supply and consumption;

10.4.2 Professional development support and capacity building for teachers and other school staff to implement health promotion strategies and activities;

10.4.3 School environments and cultural practices that support children eating healthier foods, and being active throughout each day;

10.4.4 The Nationals Curriculum for England to include planning and skills for healthy eating, appropriate physical activity and teaching around positive body images for all;

10.4.5. Support for parents and guardians, including for home activities that encourage children to enjoy being more active, and eat more nutritious foods.

10.5 UK Government planning and policymaking should be focusing upon empowering every person to have secure access to sustainable, healthy, culturally appropriate food including plant-based and vegan-friendly foods for all.



## **Q11. The impact of recent policy tools and legislative measures intended to prevent obesity.**

11.1 The impact of recent policy has been, overall, to disproportionately worsen food-related health problems in already struggling groups. The most marginalized and impoverished people in the UK are now increasingly experiencing food insecurity and hunger, including households with children (Food Foundation Food Insecurity Tracking <https://foodfoundation.org.uk/initiatives/food-insecurity-tracking#tabs/Round-14>). These children and adults have a high likelihood of life-long poor health outcomes.

11.2 The Vegan Society challenges a health system overly focused on unhelpful concepts of 'Body Mass Index', 'obesity' and 'overweight' and supports focusing on overall 'health' rather than 'size', with a transition to a plant-based food system. There is increasing recognition amongst health professionals, including Registered Dietitians – the UK's regulated experts on the links between diet and health – that Body Mass Index (BMI) and its derived concept 'obesity' are not necessarily reliable measures of health for most individuals.

11.3 Moreover, what evidence exists shows lack of any significant positive behaviour change from policy around food & health in England in recent decades. Unlike other major causes of preventable death and disability, public health measures in isolation have not successfully reversed population-level health issues related to food. For all these reasons, we are amongst many experts concluding, England needs different, and whole-systems, improvements to how we approach food & health (Lang & Rayner 2007, <https://onlinelibrary.wiley.com/doi/10.1111/j.1467-789X.2007.00338.x>).

11.4 However there have been some positive changes seen in driving reformulation of products to decrease the sugar content, particularly in sugary drinks through the Soft Drinks Industry Levy. Further reformulation could be encouraged in the areas of saturated fat and salt, and lightly processed plant-based protein and other ingredients can support this.

11.5 UK Government policy tools and legislative measures should now be supporting a plant-based food system transition, including good plant-based and vegan-friendly foods on every public sector menu. We need to empower every person to have secure access to sustainable, healthy, culturally appropriate, plant-based and vegan-friendly food.

**Q12. Policy tools that could prove effective in preventing obesity amongst the general population, including those focussed on the role of the food and drink industry in tackling obesity.**

12.1 We need UK public procurement policies and practices to support UK farmers to supply plant proteins and other crops to UK-based plant-based food manufacture and distribution. Our policies are outlined in our 'Planting Value in Our Food System'

(<https://www.plantingvalueinfood.org/>, to create a healthier plant-based food supply), and 'Catering for Everyone'

(<https://www.vegansociety.com/get-involved/campaigns/catering-everyone>, to immediately move forward access to good plant-based, vegan-friendly food through public sector menus) frameworks.

12.2 The UK has the capacity to ensure nutritious plant-based and vegan-friendly meals, made with substantially UK-grown crops, are on every public sector menu. Well-planned plant-based and vegan-suitable diets can support healthy living in people of all ages:

<https://www.vegansociety.com/resources/nutrition-and-health>.

12.3 By embracing the growing popularity of plant-based food, and empowering more people to choose it, our 2023 research shows that could gain up to 172,735 QALYs (Quality-Adjusted Life Years) in England ('The impact of higher uptake of plant-based diets in England: model-based estimates of health care resource use and health-related quality of life' Henderson & Sampson 2024 in prep. doi:

<https://doi.org/10.1101/2023.12.26.23300536>). This could save NHS England around £6.7 billion / year and bring net benefit of c. £18.8 billion (one QALYs = £70,000).

12.4 We need to ensure our food system supports health for all for individuals at every size. The Vegan Society affirms the increasing recognition amongst health professionals, including Registered Dietitians – the UK's regulated experts on the links between diet and health – that Body Mass Index is not a reliable or useful measure of health for most individuals. This requires long-term engagement and system-wide delivery from every part of our government, society and food systems.

12.5 UK Government planning and policymaking should be focusing upon empowering every person to have secure access to sustainable, healthy, culturally appropriate food including plant-based and vegan-friendly foods for all.

12.6 Plant-based and vegan-suitable products are on average healthier, and support better cardiovascular outcomes, than equivalent alternatives based upon animal products (Neufingerl & Eilander, 2023 'Nutrient intake and status in children and adolescents consuming plant-based diets

compared to meat-eaters: a systematic review' (<https://doi.org/10.3390/nu15204341>). This is likely due to being higher in fibre, lower in saturated fat, and potentially, due to relative health benefits of plant-derived rather than animal-derived protein. The Vegan Society advises people choose products low in salt and saturated fat, as part of a diet centred around whole plant foods.

12.7 The 'Interventions for preventing obesity in children' Cochrane review (Brown et al 2019 Cochrane Database of Systematic Reviews <https://www.cochranelibrary.com/cdsr/doi/10.1002/14651858.CD001871.pub4/full>) make numerous suggestions, which can also improve food-related health outcomes for the wider communities served by schools:

12.8 We have specific evidence from England that school-based projects which help children to grow and try more familiar and unfamiliar vegetables and fruits can create lasting and household-level improvements.

12.9 For example, 'Eat Them to Defeat Them' by Veg Power in England emphasises fun, cooperative learning, and adults in school and at home collaborating with children to increase consumption of vegetables.

12.10 Since 2018, of households whose children have taken part three times, 53% report lasting increases in the number and the variety of vegetables their children eat. This includes many impoverished households, and children who previously 'disliked' vegetables.

12.11 The Action on Fibre initiative supports the concept of measures that encourage a plant-based transition throughout the food system. The current general 'Five a Day' campaign, as well as not achieve measurable results, even when accompanied by typical starchy foods, fails to achieve the recommended 30 g of dietary fibre daily intake. Action on Fibre conclude that, "Achieving the 30g fibre recommendation can therefore be a real challenge, and requires higher fibre options to be an appealing and easy choice for meals and snacks throughout the day." (Action on Fibre: Working together to bridge the gap, The Food & Drink Federation <https://www.fdf.org.uk/fdf/what-we-do/diet-and-health/action-on-fibre/action-on-fibre-progress/>).

12.12 To systematically prevent food-related health problems, there is increasing evidence we must engage, commit and deliver across the whole of government, society and food supply chains. We need a plant-based paradigm shift, that considers our whole food system.

12.13 This means, we must change our food and drink businesses, and our public sector and home kitchens, and also our ethical, social and cultural expectations. We need clear visions of what it means to be a

healthy food society, and the long-term strategy and policies to rebuild our current unhealthy food society. We need to rapidly move away from blaming individuals when their health deteriorates due to systematic failings in our food system. We need healthy food cultural norms, where people are empowered to create their own healthy food journey.

12.14 We want everyone to enjoy the benefits which sustainable, healthy plant-based food can offer. We call on the Government to enact the following policies around food:

12.14.1 Require balanced vegan-friendly, plant-based meal options on every menu which is funded with public money, as the default.

12.14.2 Set up on-going public awareness campaigns on the health and environmental benefits of plant-based eating.

12.14.3 Explore financial intervention to improve access to healthy plant-based food, such as significant subsidies (e.g. 10%), and removing all explicit and implicit subsidies from animal-based food.

12.14.4 Promote a healthy plant-based diet within the education system. Make it compulsory for all schools to offer vegan-friendly, plant-based cookery classes to all students.

12.14.5 Have free local fruit and veg in schools, available to all students.

12.14.6 Zero VAT rates on vegan-suitable, plant-based catering and restaurants.

12.14.7 Fully include access to and support for plant-based diets in all public health strategies, for children and adults.

12.14.8 Support the use of well-known product descriptions, such as milk, butter, cheese, burgers and sausages for all plant-based food products (eg. almond milk, peanut butter, bean burgers & vegan cheese Glamorgan sausages).

12.15 There have been some positive changes seen in driving reformulation of products to decrease the sugar content, particularly in sugary drinks through the Soft Drinks Industry Levy. Further reformulation could be encouraged in the areas of saturated fat and salt, and lightly processed plant-based protein and other ingredients can support this.

12.16 We need to fundamentally re-analyse the complexities of our food system, and how we can achieve food security for everyone.

12.17 Making plant-based food production, distribution and catering the norm, will make healthier choices more accessible to everyone in every community.

*8 April 2024*