

SOIL ASSOCIATION - WRITTEN EVIDENCE (FDO0077)

The Soil Association is a charity whose vision is of good food for all, produced with care for the natural world. We work across the food system at the interface of climate, nature, and health. Through our Food for Life programme, we have twenty years' experience in improving children's diets and advocating for food and nutrition policies that promote public and planetary health.

The charity is funded by a mixture of philanthropic, commercial, government, and public funds, including trusts and foundations, member and supporter donations, government grants and corporate partnerships, plus income from Soil Association Certification, our not-for-profit subsidiary which certifies organic food, farming, textiles, beauty, and sustainable forestry.

SUMMARY

This written submission builds upon the oral evidence provided to the committee and outlines our headline recommendations. It says that to promote good dietary health, we must:

- **Learn from the past**
- **Embrace the science of ultra-processing**
- **Prioritise children and infants**
- **Confront industry interests**

A summary of recommendations can be found on page 6.

LEARN FROM THE PAST

Successive UK Government obesity strategies have failed to prevent rising rates of overweight and obesity and associated chronic disease, and we know why they have failed. Analysis published in *The Milbank Quarterly* from Dolly Theis and Martin White of the Centre for Diet and Activity Research (CEDAR) at the University of Cambridge interrogated 14 government-led obesity strategies in England from 1992 to 2020. They analysed these strategies – which contained 689 wide-ranging policies – to determine whether they have been fit for purpose in terms of their strategic focus, content, basis in theory and evidence, and implementation viability.ⁱ They found the government's policy approach had failed for three primary reasons:

- i. **Ineffective and inequitable ideas:** The government has largely proposed ideas that are unlikely to be effective and equitable. For example, by prioritising information campaigns and other “high agency” individually focused policies that seek to get people to change their own behaviour, without making it easy by shaping the food environment around them.
- ii. **Mostly voluntary regulation:** The government has tended to introduce voluntary regulation measures which rely on the food industry to change itself, without any real consequences if they don’t. Very few mandatory regulatory policies have been proposed, let alone fully implemented.
- iii. **Lack of implementation:** Policies have largely been proposed in a way that means they’re unlikely to be implemented, so government ends up proposing the same or similar policy ideas again and again. The most recent four government obesity strategies have contained the same or very similar policy proposals and many of them just don’t get enacted, or else get delayed or scrapped.

Industry lobbying has played a central role in these three failings, with successive governments pressurised to focus on individual behaviour change and voluntary initiatives lacking teeth or a means of enforcement. The Soil Association concurs with this analysis, and proposes an additional fourth reason that past obesity and public health strategies have failed:

- iv. **Excessive focus on nutrients, rather than foods.** Policies have too often been narrowly focussed on single nutrients as determinants of health, systematically decontextualised from the foods, dietary patterns, social contexts, and food systems in which they are embedded. The problem to be solved has accordingly been seen *fat*, or *calories*, or *sugar*. This approach has diverted attention from the ingredients, additives, and processing techniques used in the manufacture of ultra-processed foods, and from the study of such products as a whole, including the dietary patterns they produce, and the food systems which drive ultra-processing. This has led to policy approaches more conducive to the interests of food corporations (i.e. voluntary reformulation programmes) than the public.ⁱⁱ

RECOMMENDATION #1: Design an obesity strategy framed around *food* rather than nutrients, enabling system change rather than individual behaviour change, with mandatory regulation of the food industry at the strategy’s core.

EMBRACE THE SCIENCE OF ULTRA-PROCESSING

Extensive evidence from over 500 studies across more than 14 countries shows diets rich in ultra-processed foods (UPF), as defined by the NOVA system, to be a major contributor to the burden of disease.ⁱⁱⁱ

As recognised in the British Medical Journal earlier this year, evidence from 45 meta-analyses encompassing almost 10 million participants identifies associations between ultra-processed diets and 32 health parameters. The quality of the evidence was found to be “strong” for all-cause mortality, obesity, and type 2 diabetes. Overall, the authors found that diets high in ultra-processed food may be harmful to most—perhaps all—body systems.^{iv}

The science of ultra-processing is relatively new, and the policy implications remain contested. The Soil Association recommends the science and debate should be interpreted as follows:

- **The issue is ultra-processed DIETS, rather than individual products.** It’s important to note that poor health outcomes are associated with *diets* high in UPF; those health outcomes cannot be attributed to individual products. NOVA-based research does not suggest that every UPF has a uniform – or uniformly ‘bad’ – effect on health. It’s the dietary pattern that matters – the balance of UPF versus whole and minimally processed foods.
- **Diets based around whole and minimally processed foods are healthy.** A robust body of science suggest that diets based around diverse minimally processed foods, mostly of plant origin, will support good health.^v This view is aligned with the Eatwell Guide, which encourages consumption of plentiful vegetables, fruits, pulses, and whole grains (though the Guide doesn’t explicitly refer to processing). It also aligns with public health advice for feeding children under 2 years of age. NOVA-based research supports this, reinforcing the understanding that diets should be based around whole and minimally processed foods.^{vi}
- **The UK diet is both unbalanced and unequal.** Many people in the UK aren’t eating a healthy diet – they’re not consuming sufficient vegetables, fruits, pulses, whole grains, or healthier animal foods – partly because these foods are being displaced from their diets by UPF. Over 50% of UK dietary energy is now UPF, and this rises to over 65% for children.^{vii} UPF consumption is consistently higher in more deprived groups, while consumption of fresh and minimally processed foods is consistently lower. Health outcomes such as obesity also show pronounced social gradients. Re-balancing diets away from UPF and towards minimally processed foods is likely to improve population health and could help address social inequalities.
- **Governments should take a precautionary approach to child and infant health.** We don’t understand everything about ultra-processed foods and health, and it’s important that governments invest in further research to address questions not yet fully answered. But we do not need to wait for further research before we act, as the evidence is sufficient for a policy response, having reached a ‘critical mass’ that

warrants political action, especially among children and infants. Governments should take a precautionary approach during this stage of development – when taste preferences, eating habits, and long-term health are being established – and act with urgency to re-balance diets away from UPF.

- **There are ‘no regrets’ actions that governments can take now.** While some ‘harder’ policy actions may be challenging or controversial to implement (such as ‘bans’ or taxes), and require more research and debate, there are numerous ‘no regrets’ actions that governments can take today. These are actions which make minimally processed foods (and healthier processed foods) more accessible and affordable to everyone, and which curtail exposure to ultra-processed products marketed for children and infants. One example would be an update to dietary guidelines to promote whole and minimally processed foods as the basis of a healthy diet.
- **Nutrient profiling and NOVA can be employed together and seen as complementary.** The UPF category is broad and encompasses products with diverse nutritional profiles. Nutrient profiling and NOVA can and should be employed in tandem to inform dietary health policies and guidelines, and to drive increased consumption of minimally processed foods. Both nutrient profiling and NOVA have an important role to play; they are not in competition. Both illuminate dimensions of a healthy diet. UK Government should therefore look to update the nutrient profiling model to incorporate markers of processing.
- **Both UPF and HFSS are of concern.** Many UPF are high in fat, salt, or sugar, and many HFSS products are ultra-processed. There is considerable overlap (though a sizable segment of UPF falls out of the HFSS category) and the prevalence of both in the UK diet is concerning and demands a response. Governments should press ahead with actions to restrict the marketing and consumption of HFSS products, within a food strategy that aims to re-balance diets away from UPF. Action on HFSS should be seen as a necessary first step to addressing ultra-processed diets.
- **There is public appetite for government action on ultra-processing.** Polling from the Food Farming and Countryside Commission has found high public concern for ultra-processed foods, and appetite for government and businesses to respond, with nationally representative surveys finding that 74% of people would welcome government action on ultra-processing.^{viii} This polling coheres with evidence from Henry Dimbleby’s National Food Strategy suggesting public appetite for government action on diets and regulation of the food industry. There is much still to discuss, but the time for action is now.

RECOMMENDATION #2: Governments should acknowledge that diets rich in ultra-processed foods are contributing to ill health, and update UK dietary guidelines to promote diets based around diverse minimally processed foods.

RECOMMENDATION #3: UK Government should update the Nutrient Profiling Model in light of the science of UPF to incorporate markers of processing, ensuring that both NOVA and nutrient profiling approaches are shaping policy.

As described by Chris Van Tulleken in his oral evidence session, one way of bringing more ultra-processed products into a regulatory framework would be to introduce mandatory warning labels, based on UK dietary guidelines with thresholds calculated on a 'per total calorie' basis rather than 'per hundred grams'.

RECOMMENDATION #4: Introduce mandatory warning labels for all packaged products, based on UK dietary guidelines with thresholds calculated on a 'per total calorie' basis, informed by the approach adopted in Chile.

PRIORITISE CHILDREN AND INFANTS

"Learning to eat should be an adventure – joyful and challenging – but our children are increasingly being robbed of the experience. Many are growing up not knowing the tastes, textures, and smells of real food. Many will rarely feel fresh produce between their fingers. Many will enter adulthood only knowing the simplified and sweet flavours of ultra-processed products, leading to unhealthy choices and poorer health outcomes later in life. Ultra-processed foods now make up roughly two-thirds of the average child's diet in the UK. We believe a love of good food should be nurtured in children from the youngest age possible."

So read the open letter to the Prime Minister, sent by the Soil Association in 2023, signed by leading advocates for public health and children's food, plus celebrity chefs and authors, among them Yotam Ottolenghi, Thomasina Miers, Bee Wilson, and Hugh Fearnley-Whittingstall.

The Soil Association's accompanying report 'Learning to Eat'^{ix} explored how children in Britain today face barriers to developing a healthy relationship with food. Growing up surrounded by UPF, their appreciation of the joy, complexity, taste and texture of whole foods is inhibited. As children learn not only 'how' to eat but also what, how much, and in what context to eat, the prevalence of UPFs in their diets can hinder the development of healthy eating habits and taste preferences. The Soil Association's report was informed by First Steps Nutrition Trust's analysis

in their 2023 report 'Ultra-Processed Foods marketed for infants and young children in the UK'.^x

With regards to solutions, there are no easy answers to the challenge of ultra-processed diets in childhood and infancy, but schools, nurseries and other settings can play a central role. The 'whole school approach' to food embodied in the Soil Association's Food for Life School Award offers a template for healthy, sustainable eating. It increases access to healthy meals while re-connecting children with where their food comes from, helping them cultivate an appreciation for minimally processed foods from a young age. While 61% of primary school meals are UPF, and 81.2% of packed lunches, Food for Life emphasises fresh preparation, positively shaping children's taste preferences, minimising harmful additives, and embedding food education.

RECOMMENDATION #5: All schools should be supported to take a whole school approach to food, following the example set by the Food for Life Schools Award – if every school in England was a Food for Life school, an estimated one million more children would be eating their five-a-day, benefiting their health while nurturing an appreciation of real food.

RECOMMENDATION #6: Sensory food education should be rolled out in all schools, building on the model developed by TastEd, alongside practical cookery and food education across the curriculum, farm visits and growing.

RECOMMENDATION #7: Implement the recommendations outlined by First Steps Nutrition Trust, including updating public health recommendations on infant and young child feeding to explicitly address food processing and to promote nutritious, unprocessed and minimally processed foods and drinks.

CONFRONT INDUSTRY INTERESTS

The influence of the food industry over science and policy is a contentious subject, especially in the context of ultra-processing. Nuance is needed in the discussion. As Bee Wilson noted in her oral evidence session, the 'food industry' is a broad and diverse entity, encompassing businesses ranging from small independent retailers to transnational manufacturers of ultra-processed products and junk foods, and many diverse businesses in between.

It is the Soil Association's view that government action to improve population health needs to be *pro-business*, seeking to create opportunities for more ethical and environmentally benign food

businesses to flourish, namely those working to provide a diet of whole and minimally processed foods, sourced from agroecological farming systems. However, we also believe that action to improve population health requires that governments confront vested interests, such as those of the UPF industry and their associated bodies and front groups.

UPF industry involvement in science and policy is of concern for several reasons. We raise just two concerns here:

- i. There's ample evidence that the UPF industry has invested in lobbying and corporate political activities designed to entrench a policy paradigm conducive to their business interests, at the expense of public health. This lobbying has sought to frame the acceptable, 'good,' policy solution as being individual-focused, with targeted interventions aimed at individual behaviour change through, for example, education and information. They have similarly posited self-regulation and voluntary codes as appropriate and cost-effective ways to align industry practices with the public interest. The unacceptable, 'bad,' policy solution has been framed as being whole-population-based and statutory.^{xi} This lobbying has been successful and helps explain why previous obesity strategies have failed.^{xii}
- ii. To present themselves as benign partners in the policymaking process, UPF and junk food corporations have sought a social licence to operate, working with 'health-washing' front groups to build their credentials. To give an example, one prominent 'healthy eating week' last year was sponsored by Coca-Cola, while a school food education programme is being run by an organisation funded by corporations such as Mars, Pepsi, McDonald's, Nestle.

Obesity should be understood as a disease driven by commercial determinants.^{xiii} As the Soil Association stressed in its oral evidence, there is a need to reconfigure the dynamics of power, addressing these commercial determinants and ensuring that science and policymaking are free from undue industry influence. We also stressed that the challenge needs to be properly understood: 'food industry' funding and engagement is not necessarily 'corrupting' for scientists or civil society organisations – the greater issue arises when the UPF industry levers these relationships to 'health-wash' their image and bolster their influence over policymaking. We suggested that the boundaries need to be re-drawn, requiring a stricter approach to conflicts of interest at the interface of science and policy (e.g. addressing conflicts of interest on the Scientific Advisory Committee on Nutrition), greater transparency in lobbying, and a more rigorous approach to due diligence among civil society organisations.

Susan Jebb echoed some of these points in her evidence, stressing that the challenge should be seen systemic, especially for scientists confronted

with incentives to engage with industry. Susan said the issue was so complex it warranted a public inquiry of its own, a suggestion the Soil Association supports.

RECOMMENDATION #8: Launch a public inquiry into food industry influence over science and policy, with a view to honing the approach to conflicts of interest, including on the Government's Scientific Advisory Committee on Nutrition.

RECOMMENDATIONS

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RECOMMENDATION #2: Acknowledge that diets rich in ultra-processed foods are contributing to ill health, and update UK dietary guidelines to promote diets based around diverse minimally processed foods.

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8 April 2024

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