Summary of FPH Position on Ultra-processed Foods

Written by Kristin Bash, Chair, Food SIG

The Faculty of Public Health strongly advocates for policy and initiatives to support a healthy and sustainable diet. As one of its three key recommendations in the 2022 policy position statement on food, the Faculty called for:

> "A strategic plan for how to shift our population to a healthier and more sustainable dietary pattern, to include a clear definition of what a healthy, sustainable diet means, and policy drivers across all levels of government to support this shift."[1]

Recommendations for a healthy diet, as outlined in The Eatwell Guide, centre around fruits, vegetables, and whole grains, along with lean protein and calcium sources as the core components of a healthy dietary pattern, one that also limits foods high in salt, fat and sugar[2].

More recently, a classification of foods known as NOVA has been developed that is based on the degree to which they are processed, with 'ultra-processed foods' (UPF) as the highest degree of processing[3]. Acknowledging the emerging evidence related to the risk associated with diets high in UPF, the NOVA classification is now suggested as a useful measure of quality in the diet and potentially for associated policy positions to address their consumption[4].

The Faculty recognises the growing evidence base that demonstrates increased health risks associated with diets high in UPFs; the clear overlap between UPFs and foods that are high in fat, salt, and sugar; and the risk of having high levels of UPF in the diet 'crowd out' foods recommended within the Eatwell Guide. However, it is not our current position that policy action should be taken to address UPF-classified foods as a single category due to 1) the continued utility of current dietary guidance, 2) the conflation of food types within the UPF classification that may have significantly different levels of risk (or benefit); and 3) the risk of disruption to current food policy centred around the nutrient profiling model.

Key points:

- As defined in the NOVA food classification system, ultra-processed foods (UPFs) are made mostly or entirely with substances extracted from foods, often chemically modified, with additives and with little, if any, whole foods[4].

- High consumption of UPFs is associated with a range of poor physical and mental health outcomes[5-10]; this includes a growing amount of published research that finds significant association after adjusting for other nutrient quality scores, thereby isolating the impact of the processing from that of the nutrition[11-13].

- In the UK, over 50% of our diet by energy is UPF; this rises to over 65% of the daily calorie intake of children[14 15]. This means the majority of our calories do not come from foods known to support good health, as defined by the Eatwell Guide: fruit, vegetables, whole grains, pulses, legumes, seeds, nuts, oily fish and lean, healthy protein and calcium-rich foods[2]. This function of UPF foods 'crowding out' healthier alternatives has a negative impact on overall dietary quality.

- High consumption of UPF is significantly associated with lower overall dietary quality[16]. This includes a lower intake of polyphenols which are known to be beneficial to human health[17].

- Foods classified as UPF are often also classified as HFSS food and drink; those that meet both criteria should be the priority for reduction. Foods classified as UPF are often low in fibre, including soluble fibre; replacing UPF in the diet with whole plant foods (that naturally contain soluble fibre) is likely to be health-promoting.

- As a dietary category, UPF combines many food types into a single grouping, including confectionary products, processed dairy and meat products, and whole-grain bread. Some evidence suggests certain of these UPF categories (e.g., sugar-sweetened beverages, artificially sweetened beverages, processed meat products) are associated with greater risk to health than others, and some categories (e.g., breakfast cereals, fruit products, dairy and yoghurt products) are associated with a reduced risk of poor health outcomes (e.g., type 2 diabetes, all-cause mortality) [18][19]. Further investigation into the stratified health impacts across a range of UPF food types and health outcomes is needed before a conclusion can be drawn on the category of UPF as a single food group.

- Processed meat also requires special consideration; all types of processed meat (and particularly processed red meat) should be limited in the diet due to the broad base of evidence linking incremental increases in consumption with a wide range of poor health outcomes[20-23].

- Research on sustainability measures related to UPFs is equivocal. An analysis of the UK National Diet and Nutrition Survey data from 2018/19 found that on a per-calorie basis, UPF has the lowest level of greenhouse gas emissions[24]. Other research suggests UPFs generally have a higher carbon footprint and other environmental impacts than whole food plant foods but lower impacts than whole animal-based foods[25-27].

- A diet rich in foods of plant origin (fruit, vegetables, whole grains, pulses, legumes, nuts, seeds) and moderate amounts of healthy protein foods of animal origin is widely recommended to support good health and well-being outcomes; this core nutrition guidance is consistent with limited amounts of UPF[28-30].

- Current Government policies regulating the marketing of foods high in fat, salt, and sugar include both implemented policies (e.g., end-of-aisles promotion restrictions) and others due for implementation (e.g., online marketing regulations). These policies rely on the UK Government's nutrient profiling model[31] to define food and drink that qualify for regulation; the use of this model to define food policy recently held up in court after a legal challenge from a large food manufacturer[32][33]. The High Court finding was definitive and provides support for the nutrient profiling model as a legally valid methodology to support current and future food policy. Support for UPF as a new policy target measure without a clear methodology for the definition would be challenging to codify and has the potential to disrupt current policy actions to regulate unhealthy food.

- The Faculty acknowledges important issues concerning health and UPFs that are aimed at infants and young children; nutrition and public health concerns for this group require special consideration that sits outside the scope of this position statement.

- The rising public interest in and use of the notion of UPFs is a welcome sign of consumers' desire for support in shifting diets. The public conversation about UPFs adds pressure on food manufacturers and retailers to restrict the flood of unhealthy and unnecessarily processed foods onto the market and helps to redefine the role of individual responsibility in an environment where whole categories of unhealthy foods are mass marketed.

The Faculty supports a population approach as the basis for public health improvement through diet; we continue to support a holistic view of a healthy diet while highlighting the risk of UPF 'crowding out' healthier foods. It is our position that reducing the amount of UPFs in the diet generally is likely to be health-promoting behaviour and that priority for reducing UPF should be placed on those foods low in nutritional value and high in salt, fat and sugar; the aim should be to consider the contribution of UPF in the diet alongside the overall nutrition quality.

Considering the balance of evidence, it is the position of the Faculty that no policy response specific to ultra-processed food as a discrete category is warranted at this time. However, we strongly support further research in this area, which will be carefully watched and considered.

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