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ANH-Intl Regional Offices



Rt Hon Jeremy Hunt  
Secretary of State for Health  
Department for Health  
Richmond House  
79 Whitehall  
London  
SW1A 2NS

6<sup>th</sup> September 2017

Dear Mr Hunt

**Re: Call for urgent review on Eatwell Guidance**

You, more than most, are acutely aware that over 75% of the current disease burden on the NHS comes from largely non-communicable diseases<sup>1</sup> that now threatens the NHS's viability. You will also be very aware that a large part of this burden is caused by preventable diseases, such as cardiovascular disease, type 2 diabetes, cancer, chronic respiratory diseases and mental disorders, triggered, mediated or perpetuated by inappropriate dietary and lifestyle choices.

It is therefore essential that guidance provided by Government reflects the latest scientific advances, research and knowledge. A rapidly growing body of evidence now indicates that guidance provided in the newly revised Eatwell Guide (2016)<sup>2</sup> may actually accelerate cardiovascular disease risk and all-cause (premature) mortality. The inappropriateness of this advice has come sharply into focus with last month's publication of initial results from the PURE (Prospective Urban Rural Epidemiology) study in *The Lancet*<sup>3</sup>. The PURE study is the largest prospective observational (epidemiological) cohort study evaluating associations of food composition on cardiovascular disease and mortality ever undertaken, involving over 200 investigators who collected data on more than 135,000 individuals from 18 countries across five continents for an average of 7.4 years. The study emphasises the urgent need for a review of dietary advice from the UK government, including Public Health England and the NHS<sup>4</sup>.

Based on the findings from the PURE study, along with other evidence (which we are happy to furnish on request), it is untenable scientifically to make the following five healthy eating claims as per the current version of the Eatwell Guide:

1. "Choose foods lower in fat" (with reference to packaged foods)
2. "Choose wholegrain or higher fibre versions with less added fat" (with reference to starchy carbohydrate sources)
3. "Choose lower fat options" (with reference to dairy and alternatives)

"Promoting natural and sustainable healthcare through the use of good science and good law"

4. "Choose unsaturated oils and use in small amounts" (with reference to the use of oil and spreads)
5. Total carbohydrate should be maintained at approximately 50% of dietary energy, most of this being derived from starchy carbohydrates<sup>5</sup>

The overall effect of the guidance is to continue to promote high carbohydrate and low fat diets, that have, over the last three decades, been seminal to soaring rates of obesity and type 2 diabetes<sup>6</sup>.

Furthermore, there are other deficiencies in the guidance that do not help prevent non-communicable diseases. These are briefly elaborated below:

- The guidance does not warn against the consumption of refined and highly processed carbohydrates that, even when these are from wholegrain sources, are known to be high glycaemic and are therefore associated with type 2 diabetes risk<sup>7</sup>.
- The guidance does not distinguish between fruit and vegetable types, their relative sugar contents or the effects of processing or cooking on their nutritional value. Fruits and vegetables are not equivalent nutritionally, the PURE study revealing benefits of raw over cooked vegetables. There are also great differences in nutritional value between different fruits and vegetables with diversity being required to ensure consumption of a suitably broad range of phytochemicals for modulation of multiple metabolic, nutrient sensing and kinase pathways regulating homeostasis as well as nutrient utilisation and storage<sup>8</sup>.
- The guidance makes no reference to high temperature cooking of meats that is known to form heterocyclic amines (HCAs) and polycyclic aromatic hydrocarbons (PAHs) that are cancer-causing in humans<sup>9</sup>.
- There is no information in the Eatwell Guide that informs the public of the high carcinogenic risk associated with processed meats<sup>10</sup>, that may be promoted by nitrite preservatives<sup>11</sup>.

Based on the above concerns, and on behalf of the doctors, nutritional practitioners and consumers that we represent, we request that your Department initiates an urgent review of the Eatwell Guide. It is entirely appropriate that the initial result from the PURE study should act as a trigger for this review.

While we applaud commitment to the low sugars target proposed by the Scientific Advisory Committee on Nutrition (SACN) in its report on carbohydrates in 2015<sup>12</sup>, it is widely agreed that "the 5% target for energy from free sugars is unlikely to be achievable by the UK population in the near future."<sup>13</sup>

We have written also to Duncan Selbie at Public Health England and are requesting an experts' meeting to discuss the implications of the PURE study and other accumulating evidence that suggests that the current Eatwell Guide might give rise to consumer behaviours that increase, rather than reduce, the public's non-communicable disease burden.

We look forward to hearing from you, especially as to whether you will initiate, based on the PURE findings, an urgent review of the Eatwell Guide.

Yours sincerely



**Robert Verkerk PhD**  
**Founder, executive and scientific director**  
**Alliance for Natural Health International**

cc. Duncan Selbie, Chief Executive, Public Health England

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**About ANH International**  
[www.anhinternational.org](http://www.anhinternational.org)

Alliance for Natural Health International is an internationally active non-governmental organisation promoting natural and sustainable approaches to healthcare worldwide. Our catch cry is 'love nature, live naturally'.

ANH-Intl campaigns across a wide range of fields, including for freedom of choice in healthcare, healthy eating & lifestyles, and the use of micronutrients and herbal products in the management of our health and resilience. We operate campaigns that include drawing attention to misinformed, Big Food influenced government healthy eating advice, to the uncertain science and risks of genetically modified foods, to the need for informed choice on vaccination and that aim to end mass fluoridation of drinking water supplies. We accomplish our mission through a unique application of 'good science' and 'good law'.

The organisation was founded in 2002 by Dr Robert Verkerk, an internationally acclaimed expert in agricultural and health sustainability. Our international office is based in Dorking, UK, while our US base operates out of Atlanta, Georgia.

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## REFERENCES

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<sup>2</sup> NHS Choices, The Eatwell Guide: <http://www.nhs.uk/Livewell/Goodfood/Pages/the-eatwell-guide.aspx>.

<sup>3</sup> Dehghan M, et al. Associations of fats and carbohydrate intake with cardiovascular disease and mortality in 18 countries from five continents (PURE): a prospective cohort study. *Lancet*. 2017 Aug 28. pii: S0140-6736(17)32252-3. [[http://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(17\)32252-3/supplemental](http://www.thelancet.com/journals/lancet/article/PIIS0140-6736(17)32252-3/supplemental)]

<sup>4</sup> Harcombe Z. Dietary fat guidelines have no evidence base: where next for public health nutritional advice? *Br J Sports Med*. 2017 May; 51(10): 769-774.

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