

**Public notice and comment:**  
**World Health Organisation (WHO) Guideline Development Group**  
**(GDG) for ultra-processed foods (UPF)**  
**The Vegan Society Response**

The Vegan Society notes that more evidence is needed to establish whether there is a direct link between processing techniques and additives and long-term health risks.

The existing epidemiological evidence does indicate a potential relationship between the proportion of 'ultra' processed foods that make up a person's diet and health risks. However, it is not clear whether this relationship extends beyond nutrient profile into processing itself. We know more about the mechanisms relating to ingredient source: animal derived foods tend to promote harmful inflammation, plant-derived foods tend to protect against inflammation. The health effects of nutritional content are also better understood, with dietary fibre, vitamins and minerals being generally protective, and saturated fat, free sugars and salt being generally harmful.

**Dietary patterns rather than individual foods are key**

The Vegan Society believes that dietary patterns - such as the balance between health-promoting lightly processed plant foods, and foods high in saturated fat, free sugars and salt – are key, not individual food items. There are significant groups of processed foods currently labelled as 'ultra' which are not linked to increased health risks.

Thus, the Vegan Society notes that the concept of 'ultra-processed foods' is very poorly and inconsistently defined in research, policy and industry, and lacking nuance (Petrus et al. 2021). The UK Scientific Advisory Commission on Nutrition (SACN), after carefully investigation, has issued the following guidance to the UK Government (SACN 2023, 2025a & b) which supports our position:

In 2023, "Overall, SACN concluded that the association between higher consumption of (ultra) processed foods and adverse health outcomes is concerning. However, limitations in the available evidence meant that it was unclear whether these foods are inherently unhealthy due to processing or because a large majority of them are high in energy (calories), saturated fat, salt and/or free sugars."

In 2025, SACN further noted, "On balance, most people are likely to benefit from

reducing their consumption of processed foods high in energy, saturated fat, salt and free sugars, and low in fibre. . .

“SACN reiterates its existing advice on processed foods (see above), particularly on minimising intake of sugar-sweetened beverages and avoiding high intakes of red and processed meat.

For younger children, SACN recommends unsweetened food and drinks.

In line with SACN’s recommendations, The Vegan Society believes the World Health Organisation (WHO) should focus upon nutrients, the source of ingredients, and the energy, free sugar, non-sugar sweetener, salt, saturated fat, dietary fibre, vitamin and mineral content of foods and diets. Dietary fibre of course comes exclusively from plants and mushrooms.

The SACN recommendations for the UK are also to avoid high intakes of red and processed meat. Thus, WHO should explicitly recognise the benefits of processed plant-based protein foods with low added salt, fat, sugar and non-sugar sweeteners, and useful dietary fibre content, as part of healthy diets especially where appropriately fortified.

### **Processing can also benefit health**

The Vegan Society affirms that a wide range of processing techniques are vital, both to increase the nutritional value and bioavailability of many foods, as well as the accessibility of adequate food to many people.

Manufacturers need to ensure that staple foods such as bread have appropriate vitamin and mineral fortification for the regions where they are sold, to address the nutrients of concern in those regions. Such staples, along with plant-based alternatives to animal products are vital foods for those seeking healthier options including for those who are impoverished in time, finance, and/or fertile land access.

Thus, the narrative needs to move away from the concept of ‘ultra’ in processing, towards ensuring affordable, culturally acceptable, fortified foods are accessible to everyone for the nutritional health benefits they offer.

Terms such as ‘HFSS foods’, meaning those ‘high in fat, sugar and salt’ also need to be modified to recognise whole plant foods containing healthy fats which can form part of a balanced diet. It is saturated fat which is frequently overconsumed particularly in the Global North regions including the UK. Plant foods which intrinsically contain (largely unsaturated) fats including essential Omega 3 & 6 fats, and sugars, alongside

dietary fibre, protein and vital micronutrients must be distinguished from foods high in 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 (EFSA 2010).

### Not all processed foods carry health risks

Evidence is accumulating that health risks are associated with certain processed foods: non-sugar and sugar-sweetened beverages; animal meat, milk and egg-based foods (including processed meats); and condiments which often contain added salt and sugar.

In contrast, cardiovascular disease, type 2 diabetes and cancer are not proving to be associated with other foods frequently classified as so-called 'ultra' processed 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).

We emphasize that, in particular, the 'NOVA' classification (Monteiro et al. 2010) of 'ultra' processed foods has significant limitations. Primarily, NOVA fails to account for different ingredient & nutrient profiles. The NOVA classification of processing methods results in putting very different foods into one very diverse, 'ultra' processed category which thus has questionable scientific meaning (Petrus et al. 2021).

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 Nutri-Score (IARC 2021) which consider the nutrient profile of foods in more detail, are likely more helpful to quantify the health risks or benefits of individual foods (BNF 2023).

This is particularly relevant for plant-based, processed alternatives to unprocessed animal products. A recent review concluded that "While ultra-processed plant-based foods are less healthy than whole plant foods, they may offer better cardiometabolic outcomes than unprocessed animal-based products. As transitional tools, products such as plant-based milks, meat analogs, and margarine may facilitate dietary shifts. Public health guidance should reflect these nuances to support realistic, health-promoting transitions" (Del Carmen Fernández-Figares Jiménez & López-Moreno 2025).

## More research is needed on proposed risks associated directly with processing

The Vegan Society notes that research published in The Lancet paper raises concerns around 'xenobiotics' and additive ingredients in food processing. The use of these additives is regulated under the United Nations Codex Alimentarius. More research is needed on the combined and chronic impact of consuming multiple additives over time on long-term health.

Further research is needed on so-called 'ultra' processed foods to explore the causes underlying the correlation with health risks. We need to know whether additives are an important mechanism, as well as the relative contribution of high saturated fat, salt and added sugar content which we know add to dietary nutrient imbalances.

As suggested by The Lancet paper, studies comparing the intake of individual processed foods with their non-processed counterparts - for example, packaged wholegrain bread made with the industrial 'Chorleywood' process, with additives, v.s. traditional recipe and method wholegrain bread - may help to address these questions.

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.

## Our actions and recommendations

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

- 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.
- The label 'ultra processed' food (UPF) is not well founded in food science, to show food health profiles; the ingredients and nutrients are more important to focus on than the processing.
- 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 either unprocessed red meat or processed meat products (Neufingerl & Eilander 2023).
- People can make informed decisions around the health profile of products by checking the specific nutritional information on food packing and should aim to choose products that are low in salt, free sugars and saturated fat.

The Vegan Society advises caution when considering broad regulation of 'ultra-processed' foods, as this may discourage people from consuming foods that, despite their 'ultra-processed' status have been shown to improve long-term health outcomes, for example wholegrain cereals and breads. This is also applicable to many appropriately fortified plant-based processed foods which are low in free sugars, non-sugar sweeteners, saturated fats and salt. Particularly important are such foods which are useful sources of plant protein, such as meat and dairy alternatives, essential Omega 3 & 6 fats, dietary fibre and other nutrients of concern, which can be healthily included as part of a balanced diet that prioritises the consumption of lightly processed and whole plant foods.

ATTACHMENT: SACN 2025b, Scientific Advisory Commission on Nutrition Statement on Processed Foods and Health: Rapid Evidence Update, 2025

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