Study Finds UK Food Policy Misses Big Slice of Ultra-Processed Problem

Researchers in the United Kingdom analyzed more than a decade's national dietary data to quantify the dietary overlap between explicitly regulated HFSSs and UPFs that are indirectly covered under HFSS rules in the United Kingdom (UK).

While the UK's food policies are designed to curb the consumption of HFSS, the health risks of UPFs are a growing concern.

Study findings revealed a surprisingly large gap between what is classified as HFSS and what is considered ultra-processed. While more than half of UPF products were also classified as HFSS, overlap is partial; many UPFs are regulated via HFSS rules, but ~40–45% fall outside the HFSS net.

A substantial portion comprising notable inclusions like low-calorie soft drinks and white bread was not. This suggests that the UK's current nutrient profiling model captures, at best, just over half of consumed UPFs, highlighting a significant gap in public health policy.

Results were broadly similar using the 2018 NPM, though overlap was slightly smaller; current UK policy still uses the 2004/05 NPM.

Study

The present study aims to address this knowledge gap by providing the first detailed analysis of the overlap between HFSS foods and UPFs in the UK diet. The study leveraged a massive dataset comprising 11 annual waves of nationwide nutrition data from the UK National Diet and Nutrition Survey (NDNS; 2008-2019).

Data of interest includes nutrient intake, overall food consumption, and nutritional status. The present study used data from 15,655 individuals, with participant- or parent/guardian-reported food items classified into:

1. HFSS (using the UK's official 2004/2005 NPM)
2. UPF (classified using the NOVA classification system)

Notably, NPM-based HFSS classification involves scoring foods based on their energy, saturated fat, sugar, and sodium content, balanced against beneficial components like fruits, vegetables, fiber, and protein. In contrast, NOVA classifies foods by degree of industrial processing (not by a nutrient score).

Comparative analyses between HFSSs and UPFs were conducted using three independent metrics:

1. Proportion of food items (food-level analysis)
2. Percentage of total energy intake (in kilocalories)
3. Percentage of total food weight (in grams)

Results

The present study reveals a substantial but far from complete overlap between NPM-based HFSS and NOVA-based UPF classifications. When comparing participants' total energy consumption, statistical analyses found that UPFs comprised 59.8% while HFSSs comprised only 47.4%. Under this metric, UPF and HFSS classification overlapped 58.7%, highlighting that the UK's current HFSS-based policies do not capture over 40% of UPF-derived calories.

By weight, the overlap was even smaller, with only 38.3% of the grams of UPFs also classified as HFSS, reflecting the exclusion of many high-volume but low-calorie products such as artificially sweetened beverages. Person-level estimates show UPF energy shares highest in ages 11–18 (~65%) and modest male > female differences.

Study findings were even more bleak across other evaluated metrics – Under the lens of proportion of food items consumed, 44.4% of UPF products were not categorized or regulated under the UK's HFSS policy, with low-calorie soft drinks and white bread notably excluded from regulation.

Other prominent excluded items included brown and wholemeal bread and high-fiber breakfast cereals, highlighting a key limitation of the current NPM – it fails to account for industrial additives like non-nutritive sweeteners and emulsifiers. Ironically, the study found that many foods that were classified as HFSS (and hence regulated) but not UPF were traditional, less-processed products high in fat or sugar, such as cheese, butter, whole milk, and sugars/preserves.

Conclusion

The present study is the first to investigate whether the UK's HFSS-based policies can account for the recent rise of UPFs. It demonstrates that while there is considerable overlap between HFSS foods and UPFs (~50-60%), the UK's current nutrient profiling model fails to identify and regulate a large and vital segment of the ultra-processed foods that dominate its national diet.

Relying solely on an HFSS-based approach means that policies aimed at improving public health are missing a substantial (>40%) portion of the suboptimal nutrition problem. The authors emphasise that causality for UPF harms is not established and call for an environmental impact assessment.

They also suggest that future strategies could include "deformulation", removing non-nutritive additives such as sweeteners and emulsifiers, and note potential environmental trade-offs for certain plant-based UPFs.

This research provides critical evidence for a more nuanced and practical approach to public health nutrition policy in the UK.

Source:

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