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BBC Complaints,
PO Box 1922,
Darlington,
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Dear Sir/Madam

BBC 2 Horizon - Vitamin Pills: Miracle or Myth?

I am writing to record a number of serious complaints concerning the above BBC2 television programme that aired on Thursday 25th October 2018 and in particular the adverse public health messages inherent in the programme, specifically relating to healthy, responsible eating. While such messages formed part of the backdrop to attempt to undermine the vitamin supplements industry, the programme resultantly found itself in severe breach of vital public health messages in relation to healthy eating.

Firstly, in investigating the typical diets of two students plus the presenter Dr Giles Yeo, the BBC sent out a very dangerous message that the way many people currently eat is not a serious problem because it at least provides sufficient vitamins and minerals. Though a few quick caveats were made about high saturated fat, high calorie and low fibre intakes from such diets, the huge potential harms of eating this way, including increased risk of obesity, type 2 diabetes and heart disease amongst other conditions, was absolutely ignored and passed over. Legitimising junk food diets in this way, by explicitly showing the very worst possible diet of curly fries, pizza and curries, and implying they can provide all the micronutrients needed, was a shocking position for the BBC to adopt and the programme makers must be held to account for such an irresponsible approach.

Aside from the obvious dangers of such a message, it is not supportive of Government drives to encourage people to eat more healthily by consuming at least 5 portions of fruit and vegetables a day, reducing saturated fat and calorie intake, and eating more fibre. Fruit and vegetables are a major contributor of particular micronutrients such as vitamin C and potassium, and hence make an important contribution to micronutrient intakes. The implication that consuming 5 a day of fruit and vegetables is not linked to micronutrient status is not a proven scientific fact. If the population obtained their main source of micronutrients from the junk food shown, 100% of population would of course become obese.

In addition, the analysis only addressed a handful of micronutrients and ignored others that young adult women are short of in their diets. It was pointed out that data from the National Diet and Nutrition Survey (NDNS) reveals that adolescents are the group with the highest proportion that do not consume sufficient vitamins and minerals. Yet, the types of foods analysed (curly fries, pizza, curries) are likely to feature in their typical diets. Hence repeatedly showing such junk food was a highly damaging and inappropriate message for the programme makers to convey since their pattern of eating is clearly resulting in a shortfall of micronutrients.

Also, it was not made clear whether the percentage of daily folate needs obtained from a bowl - *every day* - of curly fries related to the reference nutrient intake (RNI) for adults (200mcg/day), or the

higher requirement for women who may become pregnant. The latter are recommended to consume an additional 400mcg and hence their daily requirement is far greater at 600mcg/day. The poor folate status among women of child-bearing age is illustrated by the latest NDNS data which shows that 91% have a red blood cell folate that indicates increased risk of NTDs (i.e. below 748nmol/L).

Regardless, the notion that fries can provide half your folate requirement is a terrible public health message for the BBC and this could have been very misleading to young adult women. **It would certainly breach any advertising guidelines.**

Secondly, as Giles Yeo explained, because dietary supplements are regulated as foods, it is not possible to make medicinal claims i.e. to claim that a product treats, cures or prevents a disease. This type of claim is interpreted widely by enforcement authorities such that implied medicinal claims are also not allowed. In investigating the issue of consumer understanding that dietary supplements may not work for everyone, the BBC proposed that companies should use the permitted flexibility of wording for health claims, and qualify claims with statements for example such as, Iron contributes to the reduction of tiredness and fatigue *'if you are low in iron'*, in order to be clearer about who will benefit. However, this would be interpreted by enforcement authorities as a medicinal claim, as taking the supplement would be seen as treating or preventing a condition (low iron, or iron deficiency anaemia), which as he pointed out, is against the law. **Hence the proposal made by the BBC in the programme would be illegal.** The criticism of manufacturers made by the team producing the programme was therefore poorly researched and grossly unfair.

In fact, the section of the programme on health claims showed a clear misunderstanding of the EU Regulation on health claims that are scientifically assessed and authorised for use on foods, in which Article 13.1 health claims (the category of the iron claim outlined above) are defined as claims that describe or refer to the role of a nutrient in the functions of the body. It is prohibited to imply that consumers may not get adequate intake from their diet. Claims by law may not be targeted specifically at people with any related low nutrient status, and the aim is to safeguard general nutrient intakes. Our secondary complaint includes the fact that the programme makers have erred and misinformed the public in their interpretation of the EU Health Claims Regulation.

In summary, the BBC's flagship scientific programme conveyed a number of irresponsible, adverse public health messages in relation to junk food versus healthy eating. It appeared to legitimise junk food diets by implying they can provide all the micronutrients needed and was not supportive of Government drives to encourage people to eat more healthily.

In view of the high standards of broadcasting expected by the BBC, we await your serious review of this complaint. Is this really what we should now expect from the BBC?

Yours sincerely,



Graham Keen
Executive Director