

To:

Ms. Tereza Cristina Correa da Costa Dias, Minister of Agriculture  
Ministry of Agriculture

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Ref.: *Brazilian Dietary Guidelines*

September 23, 2020

Dear Minister Tereza Cristina Corrêa da Costa Dias,

As scholars involved with research and public policy on healthy diets across the globe, we are very concerned by the Technical Note No 42/2020/DAEP/SPA/MAPA issued by the Secretary for Agricultural Policy and the Department of Economic Analysis and Public Policies from the Brazilian Ministry of Agriculture, Livestock and Supply.

The Note, evidently written without a clear understanding of the scientific research on this topic, raises several unjustified criticisms of the *Brazilian Dietary Guidelines* issued by the Ministry of Health (1). It is accompanied by the draft of a letter addressed to the Minister of Health, with a request for an urgent and complete review of the guidelines. The draft indicated that the letter would be signed by you. We ask you to remove this request, and briefly explain why here.

Using the NOVA food classification system (2), the *Brazilian Dietary Guidelines* recommend healthy meals based on well-developed and established national and regional dietary patterns, as

are still consumed by a large segment of the Brazilian population. These are made up from a variety of fresh or minimally processed foods, prepared with small amounts of processed culinary ingredients (salt, sugar, oils, and fats). Processed foods, such as bread and cheese, also in small amounts, are consumed as part of dishes and meals based on fresh or minimally processed foods.

The *Guidelines* recommend avoidance of ultra-processed foods. These are precisely defined by the NOVA food classification and in the *Dietary Guidelines*. They include soft drinks, sweet or salted snacks, sugared breakfast cereals, reconstituted meat products, and pre-prepared ready-to(h)eat dishes and meals. The less of these are eaten the better.

It is hard to understand why the Note does not mention the rapid recent growth in consumption of ultra-processed foods throughout Brazil, and in most countries in the world, nor the negative health impact of these foods.

Consumption of ultra-processed foods in Brazil and in all countries where their impact has been studied, has been shown to be the main driver of high energy-dense diets and inadequate nutrient intakes, both of which are related to a number of diet-related non-communicable diseases, as summarized in a recent FAO report (3).

The association of ultra-processed food consumption with overweight and obesity, diabetes, hypertension, dyslipidemias, cardiovascular diseases, stroke, breast cancer, depression, elderly frailty and all-cause mortality has been demonstrated by careful longitudinal studies conducted in large samples of individuals from different countries including the USA, the UK, Spain and France as well as Brazil (4-21).

Many countries including France, Israel, Canada, Mexico, Chile, and Uruguay are using NOVA as a tool to educate their populations and as a basis for national food and nutrition policies and programs designed to improve food systems and public health.

In the USA the National Institutes of Health has conducted a randomized controlled trial (22) whose results show beyond doubt that increased consumption of ultra-processed foods causes excessive energy intake and weight gain. The Director of the National Institutes of Health, Francis Collins, has stated on this study: 'It appears that a good place to start in reaching or maintaining a healthy weight is to... work to eliminate or at least reduce ultra-processed foods in your diet in favor of a balanced variety of unprocessed, nutrient-packed foods' (23). This study is of special importance now because science is clear on the fact that overweight and obesity increases substantially the risk of serious suffering and death from Covid-19 (24).

The Technical Note has no valid foundation. It ignores the fact that the *Brazilian Dietary Guidelines*, supervised by the multi-professional team working for the Ministry of Health Food and Nutrition Coordination unit (CGAN), were the subject of consultation with health and food and nutrition scholars and professionals from all Brazilian states and with several stakeholders including the food industry, before approval by the then Minister of Health.

The Note asserts that the NOVA food system classification used by the *Guidelines* ‘... is confusing, incoherent, and hinders the implementation of adequate guidelines to promote adequate and healthy nutrition for the Brazilian population’. This claim is not supported. It asserts that ultra-processed foods are harmless, using a reference that did not evaluate these foods. It makes the wild claim that the *Brazilian Dietary Guidelines* is one of the worst in the planet, despite their acknowledgement by United Nations agencies and practically universal acclaim and support. It claims that it is comical to define ultra-processed foods by the number of ingredients they contain, which is untrue; the presence of five or more ingredients is merely a practical way to identify those foods. Their definition is precisely stated in the guidelines.

We can supply you with more documentation on and assessments of the *Brazilian Dietary Guidelines* and the NOVA food classification as now used all over the world, at your request.

Sincerely,

Signatures on the next page

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