

Response to WHO Call for Comment

Scope of the Guideline on Optimal Intake of Animal-Source Foods

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We welcome WHO's initiative to provide evidence-based guidance on animal-source foods (ASF). Diet is central to human health, and this work has the potential to reduce the burden of non-communicable diseases (NCDs), address undernutrition, and promote planetary health.

While the draft scope demonstrates rigour, transparency, and consideration of contextual factors, I am concerned that the framing implies ASF are necessary for optimal health. Evidence shows that well-planned 100% plant-based diets, with appropriate use of fortification and supplementation, can support health across the life course. The EAT-Lancet Commission has affirmed that ASF can be included but are not essential.

WHO's guideline must therefore avoid prescriptive assumptions of ASF necessity, give equal weight to sustainability alongside health, and acknowledge that optimal intake for certain ASF categories (notably processed meats) may be zero.

Comments on the Draft Scope

1. Framing of "Optimal Intake"

The overarching question - "How much and which types of ASF should we consume for optimal health?" - risks biasing recommendations towards some "required" ASF intake. A more appropriate framing would be: "What dietary patterns, with varying or no intake of animal-source foods, best support health and sustainability across the life course?"

2. Fortification and Supplementation

The draft scope notes risks of nutrient deficiencies but excludes fortified foods and supplements from consideration. This is problematic. Fortification (e.g., vitamin B12, calcium, iodine, vitamin D, iron) and supplementation are effective, evidence-based public health measures and widely used in high- and low-income countries. Excluding them risks pathologising plant-based diets and overemphasising ASF as a solution to nutrient adequacy.

WHO's own guidance recognises supplementation and fortification as strategies to prevent deficiencies. Their omission here undermines the guideline's comprehensiveness.

3. Exclusion of Novel Plant-Based Foods

The scope explicitly states that novel plant-based foods and beverages, such as plant-based meat, dairy, and egg substitutes, will not be considered as explicit comparators. This is a serious omission. These foods already play a meaningful role in reducing the environmental impact of diets and are increasingly important in the global transition to sustainable food systems.

While some products are highly processed, many are formulated to provide useful nutrients and, importantly, offer significant health advantages compared with red and processed meat. Plant-based milk alternatives, in particular, are relevant for the large proportion of the global population with lactose intolerance, especially in the Global South. To exclude these foods risks making the guideline less relevant and less actionable in the real-world context where plant-based alternatives are rapidly expanding.

4. Health Outcomes and ASF Categories

Certain ASF categories, especially red and processed meat, are strongly associated with increased risks of colorectal cancer, cardiovascular disease, and premature mortality. The International Agency for Research on Cancer has classified processed meat as carcinogenic and red meat as probably carcinogenic. For these categories, “optimal intake” may be zero.

By contrast, plant foods, particularly legumes, nuts, whole grains, fruits, and vegetables, are consistently associated with reduced risk of NCDs. This asymmetry must be clearly reflected in the recommendations.

5. Sustainability and Environmental Impact

ASF production is a leading driver of greenhouse gas emissions, land and water use, biodiversity loss, and antimicrobial resistance. The environmental footprint of ASF, especially beef and dairy, far exceeds that of plant-based foods.

While sustainability is listed as a contextual factor, it must be given equal weight with health outcomes. Global health cannot be safeguarded without protecting planetary systems. The EAT-Lancet planetary health diet provides an important model, emphasising that ASF are optional and should be consumed, if at all, in very modest quantities.

6. Equity and Global Context

The guideline should clearly distinguish between contexts:

- In high-income countries with excessive ASF consumption, reductions are critical for health, equity, and sustainability.
- In low-income settings, ASF may help address malnutrition, but alternative strategies such as crop diversity, fortification, and supplementation are equally important and often more sustainable.

Failure to differentiate risks sending a misleading global message that ASF are universally

necessary.

7. Industry Influence and Conflicts of Interest

The scope document does not address industry influence. Given the economic power of the meat, dairy, and fisheries industries, explicit safeguards are needed to prevent conflicts of interest from shaping recommendations. The experience with tobacco and fossil fuels demonstrates the risks of allowing commercial actors to influence health policy.

Recommendations for Refinement

1. Reframe the overarching question to focus on dietary patterns, not presumed ASF intake.
2. Explicitly include fortification and supplementation when evaluating nutrient adequacy.
3. Acknowledge that for some ASF categories (e.g., processed meat), optimal intake is zero.
4. Give equal weight to sustainability alongside health outcomes.
5. Differentiate recommendations for high- vs low-income contexts.
6. Establish safeguards against industry influence.
7. Include substitution analyses comparing ASF with legumes, nuts, seeds, fortified foods, and novel plant-based alternatives.
8. Recognise the role of plant-based milk alternatives for populations with high prevalence of lactose intolerance.
9. Consider policy levers (subsidies, taxation, procurement, labelling) under contextual factors to support implementation.

Conclusion

WHO has a unique opportunity to set a global benchmark for diets that protect both human and planetary health. To achieve this, the guideline must:

- Avoid framing ASF as indispensable.
- Recognise the adequacy of well-planned plant-based diets.
- Prioritise sustainability, health equity, and independence from industry influence.

The EAT-Lancet planetary health diet offers a balanced and evidence-based template: ASF may be included in small amounts but are not essential. A WHO guideline that reflects this principle will empower governments, health professionals, and the public to make dietary choices that are aligned with the urgent health and environmental challenges of our time.