**Response to the AAP report 'The Real Deal on Brain Health Supplements'**

This report refers to the US market, where the laws and regulations governing food supplements and particularly health claims are far less strict than in the UK market. Responsible companies in the UK market are not making the kind of additional claims that this US paper suggests.

It also uses a small subset of references to dispute the hundreds of studies that show the importance of proper nutrition for cognitive function.

There are several permitted claims which have gone through a rigorous approval process by the European Food Safety Authority (EFSA) in the UK market which relate directly to cognitive function, including the claim 'contributes to normal cognitive function' for iodine, iron and/or zinc, 'contributes to the maintenance of normal brain function' for DHA and the claim that pantothenic acid 'contributes to normal mental performance.'

We should all try to eat as healthily as possible, and supplements are not a replacement. However, diet and lifestyle have been identified as key risk factors in relation to cognitive function, and in view of the current and predicted future burden of dementia, there is an urgent need to identify modifiable factors that could be targeted to promote better brain health in ageing populations.

Unfortunately, reports such as this run a risk of misleading consumers with complex nutritional needs at an important stage in life.

**ENDS**


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**The HFMA**

**The Health Food Manufacturers' Association (HFMA) is the voice of the UK's natural health industry and represents more than 125 manufacturers and suppliers of natural health products. Founded in 1965, the HFMA is a not-for-profit organisation which operates long-standing codes of practice to ensure that member companies adhere to high standards and offer good quality, safe products supported by responsible, lawful information.**
**For further information about the HFMA, visit www.hfma.co.uk.**

This report is the output of a meeting of the global Council on Brain Health held in the USA where the laws and regulations governing food supplements and particularly health claims are very different to those in the UK and more widely in the EU. The example claims listed on pages 16 and 17 of the report simply could not be made in the UK, where medicinal claims not permitted and all health claims must be pre-authorised by the EU. The only permitted claims in the UK targeted at adults and relating to brain function are for iodine, iron and /or zinc for the claim 'contributes to normal cognitive function, and the claim that pantothenic acid contributes to normal mental performance.

Additionally the sources of nutrients in food supplements can only be used if they are on a permitted list.

On pages 8-12 of the Discussion section of the report, the recommended daily amount of selected nutrients is outlined, but no information is given about the upper safe level – the daily intake that is safe to take each day and which is invariably higher than the recommended daily amount.

For such a large research topic, the report cites only 35 references, which it describes as 'selected'. However, the selection of these particular references is not transparent. In contrast, a thorough review of the area published in 2017 (1) cites over 100 references - this review concluded that emerging evidence implicates subclinical deficiencies of certain nutrients in cognitive decline and poor mental health in older adults; nutrients that show promise include B vitamins, omega-3 fatty acids and polyphenols and if further evidence confirms the findings, improving status of these key nutrients may help to better achieve cognitive and mental health in ageing (1). Additionally, a systematic review of the literature published at the end of last year also concluded that dietary factors may have a potential benefit for cognitive function in patients with mild cognitive impairment (2).

As this is an area of ongoing research in a sphere of health that is highly relevant to society and the ageing population we look to future research findings with interest. One ongoing study for example is The Trinity Ulster Department of Agriculture (TUDA) Cohort Study in Ireland (3) which is investigating the role of micronutrients in the development of dementia in older adults with early memory loss. A recent publication from this ongoing research concluded that better B vitamin status may have a role in impacting positively on mental health in older adults (4).

1. https://onlinelibrary.wiley.com/doi/abs/10.1111/nbu.12250
   Moore et al. Current evidence linking nutrition with vbrain health in ageing. Nutrition Bulletin 2017, 42: 61-68
2. https://www.cambridge.org/core/journals/british-journal-of-nutrition/article/effect-of-dietary-interventions-in-mild-cognitive-impairment-a-systematic-review/DE22F6E654DD4D125B7CA1F3C3FC9B16
   McGrattan et al Effect of dietary interventions in mild cognitive impairment: a systematic review. British Journal of Nutrition 2-18: 120: 1388-1404
3. https://www.clinicaltrials.gov/ct2/show/NCT02664584
4. https://pure.ulster.ac.uk/en/publications/b-vitamins-in-relation-to-depression-in-older-adults-over-60-year
   Moore et al B-Vitamins in relation to depression in older adults over 60 years of age; The Trinity Ulster Department of Agriculture (TUDA) Cohort Study. Journal of the American Medical Directors Association 2019, 20: 551-557