

From:
Sent: 19 May 2019 22:45
To: Finance Foodsuppl
Subject: Submission to consultation process

I am responding to this consultation process as a nutrition expert.

Malnutrition in Ireland is commonplace and very costly for healthcare (see below), yet almost entirely preventable. As a clinical nutritionist with over 40 years of experience, I outline my concerns about consequences for personal wellbeing and healthcare of the proposed VAT levy on food supplements.

Snapshot of malnutrition in Ireland

- > Malnutrition affects approx. 145 000 adults at any time in Ireland. (2018 data)
- > It particularly affects people with underlying disease, illness or chronic health problems. (Note that the vast majority of older adults have more than one chronic health condition).
- > Over 95% of malnourished individuals are community based; 1-in-3 hospital patients are malnourished.
- > Malnourished status in hospital increases risk of serious infections (e.g. superbugs), pressure sores, falls and poorer clinical outcomes.
- > Healthcare costs are 3 times higher in malnourished patients

Ref: <https://www.irspen.ie/malnutrition/understanding-malnutrition>

Malnutrition in the elderly Irish population

A 2010 report¹ for the HSE and Department of Health, '**Nutrition and Health in an Ageing Population**', stated that preventable malnutrition among the elderly is among the most pressing and costly problems faced by healthcare today. It calculated that malnutrition in older people could be costing the state €1.5 billion a year (in 2010).

In 2009, Ireland signed up to the Prague Declaration on Malnutrition, which encouraged EU states to tackle the emerging health crisis caused by widespread malnutrition in their elderly - and rapidly ageing - populations.

Professor Mike Gibney of UCD, Director of the UCD Institute for Food and Health, who was responsible for the pioneering malnutrition policy report in 2010, said:

'Twelve months on from the Prague Declaration, it's hard to conclude that malnutrition is much higher up the Irish agenda. There have been very few studies in Ireland, despite overwhelming evidence from the UK and internationally that it is a massive and very costly problem. As a result, it remains significantly under-recognised, under-detected and under-treated in older people, and is often seen as an inevitable consequence of ageing, which it is not. Malnutrition is eminently treatable in the vast majority of cases, but success depends on picking up those at risk early, and treating them without delay.'

Many of our peers in Europe have conducted screening surveys and have been alarmed by the scale and cost of the problem. Only in the last few years has there been any real appreciation of the massive economic burden of malnutrition on healthcare systems, which has been calculated to be almost twice the cost of obesity, despite receiving a fraction of the attention'.

The report warned that 'awareness of malnutrition and its consequences remains dismally low in Ireland. Doctors and healthcare managers remain largely unaware of the role malnutrition plays amongst older people in hampering recovery from illness, causing significant additional medical complications that lead to far higher rates of hospitalisation, extended hospital stays and increased need for long term care after discharge. All this leading to a very substantial drain on an already overburdened health system and incurring massive cost.'

If the impact in Ireland mirrors that of other countries – and there’s no reason to suggest otherwise – the annual bill is likely to exceed €1.5 billion, which is an astonishing 10% of our entire healthcare budget, yet it costs relatively little to treat.....Within the next 40 years, approximately one in four Irish citizens will be over 65 years of age compared with the present figure of one in nine.’

In 2019, the proposal to levy VAT on supplements indicates that awareness of the huge burden of cost and suffering created by malnutrition remains as “dismally low” (see above) as a decade ago.

Wellness culture trending

However, in Ireland, as elsewhere, we are seeing a clear shift across society towards ‘self-care’ approaches involving preventive care and healthy ageing activities through smarter lifestyle choices, particularly around diet, exercise and managing stress.

Many middle-aged and older citizens are engaging with this trend, although the lure of convenience means that sugar-rich and other highly processed, nutrient-depleted foods still tend to dominate people’s diets. Appetite and meal portions generally shrink with age, and older people recognise that this, too, can undermine their nutritional status.

Food supplements are widely used by older people; if they are eating less food and absorbing fewer nutrients, they understand that supplementation will help ‘fill in the gaps’. But logic alone does not drive repeat purchases. The reason that food supplements are a routine purchase for so many people is because they value the benefits they notice to their health – typically more energy, better mood, improved concentration or sleep.

I strongly believe that if people are willing to purchase food supplements to reduce their risk of developing malnutrition - and help avoid the downstream consequences mentioned earlier - it makes no sense to penalise this with a new levy. Food supplements represent a significant expense for many people and VAT will drive their cost beyond the reach of tens of thousands of older people who rely on them.

Yours sincerely,



1. Gibney M. Nutrition and Health in an Ageing Population. UCD Institute of Food and Health Policy Seminar Series. June 2010

