National Institute for Health and Care Excellence Overweight and obesity management

Consultation on draft quality standard – deadline for comments 5pm on 15 April 2025

Please email your completed form to: QualityStandards@nice.org.uk

Please read the checklist for submitting comments at the end of this form. We cannot accept forms that are not filled in correctly.

Use the form to comment on the content of the quality standard (i.e. the statements and other sections e.g. rationale, measures etc.), as well as answer the following questions:

- 1. Does this draft quality standard accurately reflect the key areas for quality improvement?
- 2. Can data for the proposed quality measures be collected locally? Please include in your answer any data sources that can be used or reasons why data cannot be collected.
- 3. Do you think each of the statements in this draft quality standard would be achievable by local services given the net resources needed to deliver them? Please describe any resource requirements that you think would be necessary for any statement. Please describe any potential cost savings or opportunities for disinvestment.
- 4. For draft quality statement 1: The statement includes measurement at least annually. Do you agree with this timeframe? If not, please suggest a suitable alternative.
- 5. For draft quality statement 1: Process measure b measures waist-to-height ratio. Is this calculated and recorded in patient records and thus can be extracted, and if not, would it be feasible to do so?
- 6. What are the challenges to implementing the NICE guidance underpinning this quality standard? Please say why and for whom. Please include any suggestions that could help users overcome these challenges (for example, existing practical resources or national initiatives).

Organisation details

Organisation name	
(if you are responding as an individual rather than a registered stakeholder please leave blank)	British Association for Nutrition and Lifestyle Medicine
Disclosure	
Please disclose any past or current, direct or indirect links to, or funding from, the tobacco industry.	None – nor to the sugar/sweetener/industrial starches industry
Name of person completing form	Dr Susan McGinty
Supporting the quality standard	
Would your organisation like to express an interest in formally supporting this quality standard? More information.	

Comments on the draft quality standard

Comment number	Statement or question number Or 'general' for comments on the whole document	Comments Insert each comment in a new row. Do not paste other tables into this table because your comments could get lost – type directly into this table.
Example 1	Statement 1	This statement may be hard to measure because
1	General	There is no statement referring to active prevention (of deterioration) rather simple management
2	General	The British Dietetic Association has written to NICE to update the Type 2 Diabetes Guideline, and NICE has just renamed its NAFLD Guideline to MASLD – both of which refer to obesity and weight management. NICE should not be promoting the Eatwell Guide as a clinical tool. The only dietary model to have been subject to clinical trial is the moderate starch Counterweight diet, not the Eatwell Guide. Practitioners have a duty to provide patient-centred care. Therefore the 14 January 2025 Guideline is already defective in its dietary approach.

3	Question 1	No comment
4	Question 2	No comment
5	Question 3	No comment
6	Question 4	No comment
7	Question 5	No comment
8	Question 5	No comment
9	Question 7	The standing and longevity of the Guideline in terms of dietary advice is undermined by the questionable evidence supporting the Eatwell Guide (a public health tool) for those who are obese and overweight and therefore in sub-optimal metabolic health.
10	Statement 1	Definition and Rationale is not in line with upstream prevention approaches. Definition lists downstream conditions. Suggest "For quality improvement purposes, services could focus on conditions, which are usually associated with chronic long-term inflammation, such as:" Rationale: adipose tissue is a source of pro-inflammatory cytokines. Redraft "prediction or identification of weight-related conditions" to read "prediction or identification of adiposity-related conditions".
11	Statement 2	No comment
12	Statement 3	No comment
13	Statement 4	Re: Advice for maintain changes. Since the Obesity and Weight Management Guideline has considered lower carbohydrate diets out of scope and only recommends the very high starch Eatwell Guide – which does not distinguish between higher fibre starchy carbohydrates or very high GI industrial starches – this QS statement is redundant from day one.
14	Statement 5	No comment

Insert more rows as needed

Checklist for submitting comments

- Use this form and submit it as a Word document (not a PDF).
- Complete the disclosure about links with, or funding from, the tobacco industry.
- Combine all comments from your organisation into 1 response. We cannot accept more than 1 response from each organisation.
- Do not paste other tables into this table type directly into the table.

- Clearly mark any confidential information or other material that you do not wish to be made public. Also, ensure you state in your email to NICE that your submission includes confidential comments.
- Do not include medical information about yourself or another person from which you or the person could be identified.
- Spell out any abbreviations you use

Please return to QualityStandards@nice.org.uk

NICE reserves the right to summarise and edit comments received during consultations, or not to publish them at all, where in the reasonable opinion of NICE, the comments are voluminous, publication would be unlawful or publication would be otherwise inappropriate.

Comments received from registered stakeholders and respondents during our stakeholder engagements are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the comments we received, and are not endorsed by NICE, its officers or advisory Committees.