

22nd September 2015

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Scientific Advisory Committee on Nutrition

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Dear Hilary,

Re: Draft Vitamin D and Health report

I am writing in response to the call for comments on the above report.

I would like to congratulate you and your working group on the production of a comprehensive report. In particular, I welcome SACN's acknowledgement that sunlight is insufficient to reliably provide adequate year-round vitamin D to the UK population, and the subsequent recommendation that a reference nutrient intake (RNI) of 10 micrograms vitamin D per day should now be extended to the UK adult population. If successfully implemented, this will have very significant positive effects on the UK population's health.

My own reading of the literature suggests that we should be aiming to elevate serum 25(OH)D concentrations >50 nmol/L (a threshold for adequate vitamin D status that is more broadly accepted internationally), rather than the more modest 25 nmol/L threshold that the Working Group proposes. Consequently, my preference would have been to see a RNI of 15 micrograms vitamin D or more in the adult population, to bring UK recommendations into line with those in the US. However, I welcome SACN's recommendation as a significant move in the right direction, and I anticipate that it will act as a driver towards introduction of effective vitamin D fortification in this country.

I have a few specific comments on the report, most of which relate to my field of primary interest, namely the effects of vitamin D on immune function:

Paragraph 9: Methodology. Were Mendelian randomisation studies included in the review? These studies can provide strong evidence for / against causality, as they are much less subject to confounding than other observational studies. They may have particular value in guiding recommendations where clinical trials may be impractical conduct, e.g. in the prevention of multiple sclerosis.¹ I would therefore urge the Working Group to make an explicit commitment to considering evidence from such studies in your final report.

Paragraph 437: 'Autoimmune disease is characterised by the production of antibodies against the body's own tissues'. Not all autoimmune disease is antibody-mediated – this is just a sub-set of autoimmune disease. Many of the autoimmune diseases cited in the report are T cell-mediated for example.

Paragraph 438: Asthma is not an autoimmune disease – it is an allergic / atopic disorder.

Paragraphs 457-60, Multiple sclerosis: here and elsewhere the report does not seem to have taken account of Mendelian randomisation studies. I would like to highlight one such study in particular, as it has been published since your Draft Report was issued.¹

Paragraph 471: Liu *et al* (and indeed other investigators, including myself) have not demonstrated that cathelicidin kills *Mycobacterium tuberculosis*; rather, it restricts growth of the bacillus.²

Paragraph 475: 'Evidence is lacking on whether vitamin D supplementation can influence the risk of developing infectious disease.' I would question this statement; for example, 22 RCTs enrolling a total of 10,717 patients have now investigated the question of whether vitamin D can prevent acute respiratory infection (ARI).³⁻²⁴

We have recently conducted an individual patient data meta-analysis of these trials, for which the manuscript is in preparation. Key findings are that vitamin D is protective against ARI in all participants (OR 0.88, 95% CI 0.80 to 0.95, P=0.003), and that protective efficacy is greater among individuals with baseline 25(OH)D concentrations <25 nmol/L (OR 0.56, 95% CI 0.41 to 0.76, P<0.001), and on those who receive daily/weekly dosing vs. less frequent dosing (OR for daily/weekly dosing sub-group 0.81, 95% CI 0.72 to 0.91, P<0.001). Preparation of this manuscript is underway, but I would hope that Results may be citeable, at least in abstract form, in time for the publication of your definitive report. Do let me know if you would like to cite this work in the final report.

Paragraph 476: The cited study by Reid *et al*²⁵ reports effects of knee surgery on 25(OH)D levels; its findings have questionable relevance (if any) for the field of infectious diseases. Studies in infectious disease have suggested that 25(OH)D levels do not fluctuate in response to infection.²⁶

Paragraph 477: 'A person exposed to TB will not necessarily develop the disease as the immune system is usually able to destroy the bacteria'. The evidence supporting this statement is very limited. It would be more accurate to say that 'a minority of individuals may be able to resist infection'.²⁷

Paragraph 478: 'No RCTs of vitamin D supplementation for the prevention of active TB in those with a latent infection could be identified'. One such trial is in progress: <https://clinicaltrials.gov/ct2/show/NCT01798680>. One trial has been conducted to determine whether vitamin D can prevent LTBI.²⁸ One n=8,020 Phase 3 RCT testing this hypothesis is currently recruiting: <https://clinicaltrials.gov/ct2/show/NCT02276755>

Paragraph 481: the cited study by Arnedo-Pena *et al*²⁹ investigated acquisition of latent TB infection, not incidence of TB (which is universally understood to mean active TB disease as opposed to latent TB infection). The wording here therefore needs correction. There are at least two prospective studies examining the association between vitamin D status and subsequent risk of active TB which could be cited.^{30 31}

Paragraph 482: this would be the appropriate place to cite the study by Arnedo-Pena *et al*, currently mentioned in paragraph 481.²⁹

P83, 'Respiratory tract infections' should be retitled 'acute respiratory tract infections' (tuberculosis is a chronic respiratory tract infection, but is dealt with in a different section)

Paragraph 485: the authors might want to mention the vocal cords as being classically regarded as the cut-off between URI and LRI.

Paragraph 488: it's not clear to me why the Rees study is cited specifically here – there are 22 published trials in this field, some positive, some null and some negative. See above for reference list and results of a recently completed meta-analysis.

Paragraph 495: There are at least two observational studies which investigate whether vitamin D status associates with risk of COPD.^{32, 33}

Paragraph 496: this paragraph does not acknowledge the large volume of RCTs of vitamin D for the prevention of acute respiratory infection in the general population – see above.

Paragraph 497: 'autoimmune disease risk' – do the authors mean 'infectious disease risk' here?

Paragraph 498: this statement does not acknowledge the existence of the RCT by Ganmaa *et al*.²⁸

Paragraph 500: There are observational studies which investigate whether vitamin D status associates with risk of COPD.^{32, 33}

It's not clear to me why COPD has been included in the infectious diseases section: it's a non-communicable disease caused primarily by exposure to smoke.

I hope these comments are of some use, and I look forward to reading the final report next year.

Best wishes



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