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16th January 2019

Dear Mr Stevens,

RE: Publication of the NHS England's 10-Year Plan

As Chief Executive of Breast Cancer UK, I am writing to warmly welcome the ambition and innovative thinking that lies at the heart of the new long-term plan for the NHS. Breast Cancer UK supports the plan's central proposals to shift the focus of the NHS towards prioritising prevention and the implementation of measures to improve early diagnosis.

We remain however concerned that the plan is missing several important dimensions. Specifically, addressing linkages to environmental health and increasing research investment into prevention and causation. We are also concerned the plan risks conflating prevention with early diagnosis. The remainder of my letter briefly touches upon some of these issues, in more detail.

1) Prioritising Prevention

We are pleased that the long-term plan brings prevention into the NHS's mainstream policy agenda. This new focus on prevention is pivotal, if not overdue, given that an estimated 38% of cancer cases and at least 1 in 4 breast cancers are preventable¹². Today, in contrast, we spend over 60% of public funding for healthcare on cure and rehabilitation and only 5% on prevention³.

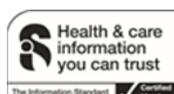
We believe that this change of emphasis is an essential prerequisite towards the improvement of the nation's health and will help reduce the pressures on the NHS itself. As such, we are delighted to see specific actions to address lifestyle risk factors and provide support for new prevention programmes in areas such as smoking, obesity and alcohol abuse – all of which are key risk factors for breast cancer.

To support the implementation of these objectives, we recommend that NHS England and the Government commit to deliver a clear action plan setting out new and ambitious goals for education, research funding and policy intervention to support the prevention of cancer. We believe that this will not only enhance the prevention agenda but complement the Government's 'Prevention is better than cure' vision, with its central objective of achieving five extra years of healthy life expectancy by 2035.

¹ Brown, K. F. et al. (2018). The fraction of cancer attributable to modifiable risk factors in England, Wales, Scotland, Northern Ireland, and the United Kingdom in 2015. *British Journal of Cancer* 118: 1130-1141. <https://www.nature.com/articles/s41416-018-0029-6>

² Soerjomataram, I. et al. (2018). Cancers related to lifestyle and environmental factors in France in 2015. *European Journal of Cancer*. 105: 103-113. <https://www.ncbi.nlm.nih.gov/pubmed/30445359>

³ Office of National Statistics (2016) 'UK Health Accounts: 2016', available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthcaresystem/bulletins/ukhealthaccounts/2016> (Accessed January 11th 2019)



2) Improving Early Diagnosis

We welcome the ambitious target of diagnosing 3 in 4 early-stage cancers by 2028. This an important target as currently, for the top 10 cancers, only 1 in 2 people in the UK are diagnosed at stages 1 and 2⁴. In addition, we support associated plans to improve public awareness of cancer symptoms, to lower the threshold for referrals by GPs to see cancer specialists, and to increase the role of new rapid diagnostic and assessment centres, which are valuable initiatives.

Despite these positive measures, we remain concerned by what we believe to be certain missed opportunities. We would strongly recommend a clearer distinction, within the plan, between early diagnosis and tangible prevention techniques. We also believe that more should be done to make the promotion of primary prevention a priority. More specifically, to help mitigate the risks linked to breast cancer, we believe primary care providers must be encouraged and supported to raise awareness of intervention techniques and the NHS should explore and invest in educational techniques to deliver for those at high risk.

3) Recognising the Importance of Environmental Health in human disease

One of our greatest remaining concerns is that NHS England continues to underestimate the impact of environmental pollutants and harmful chemicals on the nation's health, thereby treating health and the environment as separate rather than interlinked matters. Whilst we welcome the plan's references to air pollution, we believe that the NHS needs to adopt a far more urgent and radical approach for dealing with both harmful chemicals and environmental pollutants. This includes recognising and addressing the potential role that chemicals, especially Endocrine Disrupting Chemicals, play in increasing cancer risk⁵.

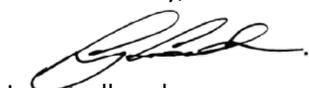
In the publication of future cancer strategies, we would ask NHS England to acknowledge the increasing concern that certain chemicals and pollutants play in increasing the risk of breast cancer. We would encourage NHS England and the government to recognise the need for a more comprehensive understanding of the aetiology of cancer. Furthermore, we continue to call on NHS England to set up an independent task force to review all existing research efforts and develop a comprehensive national strategy to address environmental and genetic factors linked to cancer. This would ensure that the precautionary principle is implemented right across health and environmental policy.

In summary, Breast Cancer UK views the publication of the NHS long-term plan as a big step forward, particularly regarding prevention and early diagnosis. We congratulate you on this and remain hopeful that some of our concerns will be remedied within any upcoming cancer strategies.

I would welcome the opportunity to meet with you or your designated officials to discuss our views and proposals to support the NHS's prevention agenda.

I look forward to hearing from you.

Yours sincerely,



Lynn Ladbroke

Chief Executive

⁴ National Cancer Registration and Analysis Service (2019) 'Cancer Outcome Metrics', available at: http://www.ncin.org.uk/cancer_type_and_topic_specific_work/topic_specific_work/cancer_outcome_metrics

⁵ Breast Cancer UK (2018) 'Endocrine Disrupting Chemicals', available at: <https://www.breastcanceruk.org.uk/science-and-research/background-briefings/endocrine-disrupting-chemicals/>