

AUSTRALIAN CHRONIC DISEASE PREVENTION ALLIANCE



ACDPA submission – Aspirations for the food regulatory system

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About ACDPA

The Australian Chronic Disease Prevention Alliance (ACDPA) brings together five leading non-government health organisations to prevent chronic disease in Australia. Cancer Council Australia, Diabetes Australia, National Heart Foundation of Australia, Kidney Health Australia, and the Stroke Foundation work together to collectively promote prevention, integrated risk assessment and effective management of chronic disease risk. This includes improving nutrition and reducing unhealthy weight at a population level.

One in two Australians have a chronic disease and one in five Australians have multiple conditions.

Chronic diseases are the leading cause of death and disability in Australia, yet nearly 40 percent of chronic disease burden could be prevented by addressing modifiable risk factors, including unhealthy diets and overweight and obesity.

Challenges and opportunities facing the broader food ecosystem

The Consultation Paper describes several challenges and opportunities facing the food system.

1. What other key challenges and opportunities are facing the food system?

We strongly agree that poor nutrition and obesity are significant challenges, and we recommend that the long-term health of Australians should be an overarching priority in this review of the food system.

Unhealthy diets are a major contributor to overweight and obesity and chronic disease. Overweight and obesity and unhealthy diets are the second and third leading risk factors for chronic disease, after smoking. Nearly 40 percent of our daily energy intake comes from unhealthy foods high in salt, sugar and/or saturated fats, while too few Australians consume the recommended serves of fruit and vegetables.

There is a clear failure with respect to the food system. This includes the widespread availability, affordability, and marketing of unhealthy foods, as well as their composition.

The World Health Organization recommends regulatory approaches, including food labelling and reformulation as cost-effective and feasible approaches to reduce unhealthy diets and prevent chronic disease. Australian modelling also supports a range of regulatory approaches to reduce overweight and obesity in Australia.

References - <https://www.who.int/publications/i/item/WHO-NMH-NVI-17.9>

<http://www.aceobesitypolicy.com.au/>

We support other recognised challenges including the need for a sustainable food system to underpin healthy diets by providing equitable and ongoing access to healthy foods across the population. We also recognise that food processing and food delivery options are evolving and should be considered as part of reforms to the food regulation system, with a focus on improving healthy eating.

Australian children and adults are exposed to widespread advertising of unhealthy, inexpensive foods on television, radio, online, outdoor media and government-owned property including public transport. Similarly, food delivery advertisements are abundant and promote easy access to unhealthy meals, with burgers and fries amongst the most ordered items in 2020.

The review of the food regulation system has an important role in supporting a healthy food system to improve diets and long-term health. Many cost-effective, evidence-based interventions intersect with the food regulation system, including food labelling, reformulation for healthier products, protecting children from unhealthy food marketing and promotion, and creating supportive environments that enable healthy diets in, and around, schools, workplaces, and hospitals.

Objectives and scope of the food regulatory system

2. Do you agree that the focus of reforms should be on ensuring the system is set up to support interface management across regulatory systems, enables collaborative risk assessment and triage of issues and provides a range of (regulatory and non-regulatory) tools to support the system's objectives and empower consumers and industry?

Yes/No

No. We highlight that any reforms to the system should prioritise public health, including short and long-term health. The Overarching Strategic Statement (OSS) objectives clearly highlight the health and safety of consumers, promoting and enabling healthy food choices, and providing sufficient information for consumers to make informed choices.

While the food regulatory system has focused on minimising the short-term risks related to food, there is an enormous need to address the long-term risks of unhealthy foods and for the food system to play a greater role in promoting and enabling healthy food choices.

We support government regulatory approaches to improve availability and access to healthier foods and to provide consumers with clear information about the healthiness (or not) of packaged foods.

This is increasingly important given the high consumption of processed foods and the contribution of these foods to unhealthy Australian diets.

Aspirations for the food regulatory system

The Consultation Paper describes a set of proposed goals or aspirations for the food regulatory system, which are supported by a number of high-level actions.

3. Is there anything missing from these aspirations and high-level actions?

Yes/No

Yes. We again highlight that aspirations and high-level actions should be underpinned by a focus on improving public health, due to the enormous burden of unhealthy diets. The food system has a key role in enabling access to healthy/unhealthy foods and promoting healthier foods at the population level, including through regulatory approaches like reformulation and food labelling.

4. Are there any aspirations or high-level actions that you disagree with and why?

Yes/No.

Yes. We highlight concerns around non-regulatory and voluntary approaches, as well shared responsibility across stakeholders (including industry). Instead, we strongly support regulatory (mandatory) approaches led by government to improve the food system and support healthier diets across Australia.

Non-regulatory or voluntary approaches are often ineffective due to low uptake across industry and inadequate targets. For example, the current Health Star Rating system has been operating for more than five years and the star ratings are only displayed on around one-third of eligible products, limiting its effectiveness in helping consumers to compare similar food and choose healthier products and undermining its purpose to improve diets. We support interpretive front-of-pack labelling through the Health Star Rating system; however, we strongly recommend making the system mandatory within the next five years to achieve its purpose in informing consumer decision making and facilitating healthier diets.

Australian modelling clearly demonstrates that regulatory approaches are more cost-effective and have greater health gains than voluntary approaches to improve diets and reduce obesity. There is a clear leadership role for government in setting and implementing mandatory regulatory approaches.

We also support the role of government in monitoring, enforcing, and evaluating approaches to improve the food system with independence and transparency. We highlight that proposals to improve the food system should be based on evidence and free from political interference or lobbying.

Reference - <http://www.aceobesitypolicy.com.au/>