

AUSTRALIAN CHRONIC DISEASE PREVENTION ALLIANCE



Submission to the Australian Government's National Food Plan Green Paper 28 September 2012

About ACDPA

The Australian Chronic Disease Prevention Alliance (ACDPA) is an alliance of five non-government health organisations who are working together in the primary prevention of chronic disease, with particular emphasis on the shared risk factors of poor nutrition, physical inactivity and overweight and obesity.

The members of the Alliance are:

- Cancer Council Australia
- Diabetes Australia
- Kidney Health Australia
- National Heart Foundation of Australia
- National Stroke Foundation

ACPDPA strongly supports a preventative health approach to reducing the burden of these diseases which together account for nearly 45% of the total burden of disease and injury in Australia.

This submission supports and complements submissions from individual members of ACDPA and builds on the previous ACDPA submission to the Issues Paper, 2011, which is attached to provide the detailed background discussion. (Attachment 1)

Overview

The ACDPA welcomes the National Food Plan (NFP) as an opportunity for a whole of government approach to food and nutrition and acknowledges the complexity of the task. The NFP has the potential to become an important framework for coordination and monitoring of all food related activities across government. However the ACDPA believes that the Green Paper has missed the opportunity by placing too strong a focus on building the processed food industry and, while mention is made of public health issues such as the growing obesity epidemic, these are not integrated across portfolios into the details of the plan. The draft plan includes numerous innovative recommendations for making the food industry more profitable; however the section on nutrition reiterates existing government programs which have not proven successful in addressing the increasing rates of obesity and related chronic illnesses.

Over 75% of the Australian population is likely to be overweight or obese by 2025 if current trends continue¹. The impact on the economy will be significant, with recent estimates calculating the cost of obesity to the Australian economy at \$58 billion in 2008². There is a significant risk that the next generation will have a shorter lifespan than their parents as a result of diet-related diseases such as diabetes, cardiovascular disease and cancer. Given this significant projected cost to the community and to individuals, ACDPA believes that public health outcomes must be central to the objectives and initiatives of the National Food Plan.

General comments

- The NFP should be underpinned by health as the key goal of all food-related policy directions;
- The NFP should include a stronger recognition of the massive cost to the economy of diet-related disease in Australia and introduce clear new initiatives to reduce these costs;
- The vision for the NFP should recognise the importance of all aspects of the food system: To promote a safe, nutritious, affordable, secure and environmentally sustainable food system which is accessible to all Australians for health, wellbeing and prosperity now and into the future;
- The NFP should articulate initiatives to provide better support for Australian farmers so that fresh produce is more readily available to all Australians, including those in remote communities;
- The NFP should include stronger policy initiatives to address supply-side factors shaping dietary choices;
- The NFP should incorporate a nationally coordinated approach that integrates food policy development across government portfolios and includes balanced engagement of all interests;
- Existing organisations or programs such as FSANZ and the Food and Health Dialogue should be appropriately funded to facilitate acceleration of their work;
- The NFP and associated policies should be regularly monitored and evaluated against performance indicators.

The detailed feedback in this submission focuses on Chapters 3 and 5 of the Green paper.

Chapter 3: Australia's Food Policy Framework

3.3 Strategic framework

The ACDPA supports the aims of the framework but recommends the addition of another aim that specifically states that the framework will set performance indicators and timelines for achievement of the NFP objectives and will provide a reference point for monitoring and evaluation of progress against the objectives.

3.4.1 Food policy leadership and engagement with stakeholders

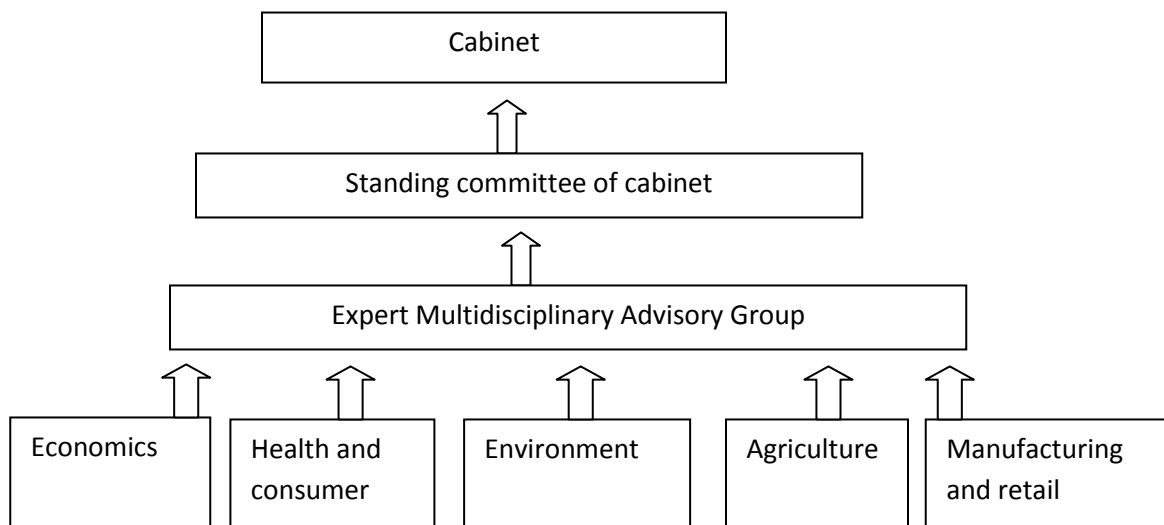
The ACDPA considers that the governance models proposed for the policy framework could be strengthened by ensuring a whole of government view through reporting directly to Cabinet, by having equal representation of public health and other interests and by involving industry in

discussions relating to implementation but not to policy development. Transparency of decision making is essential in order to build public confidence and support for the NFP.

The ACDPA believes that:

- The NFP should take a whole of Government approach to the development of food policy and prioritize public health as a key objective in the development of any food-related policies;
- Follow a similar approach to that in the UK as seen in the Food Matters³ report;
- Government should adopt the principle that the food industry has a role in implementation of policy but not in development of policy.

The following model is proposed to achieve the aims of improving leadership and stakeholder engagement:



Standing Committee of Cabinet

This committee is similar in concept to the proposed Ministerial Forum but importantly, has decision-making powers and wide representation across food related portfolios. It has a focus on integration of policy objectives and resolution of conflicting priorities across all portfolios. ACDPA proposes that this committee be chaired by the Minister for Health to emphasize the importance of health as the primary outcome of the NFP. The whole of government approach is strengthened by having this committee accountable directly to the Prime Minister through Cabinet.

Expert multidisciplinary advisory group

The expert group provides expert advice to the standing committee on the most appropriate methods for achievement of the NFP objectives. It is made up of representatives from finance/economics, environment, agriculture, public health, consumer and industry. Industry numbers must be balanced by equal public health and consumer representation.

Expert single discipline sub-groups

These expert groups support the advisory group by investigating issues in detail and providing evidence based and expert opinions. This structure allows for greater representation of the broad range of interests.

3.4.2 Monitoring and reporting on food policy

ACDPA strongly supports the proposal for monitoring and evaluation of the NFP to ensure the objectives and intended outcomes are achieved. The proposal to review the NFP after five years is supported. The proposed State of the Food System report is supported, however the ACDPA believes it should go further than the green paper proposal and should include performance indicators and timelines to enable monitoring and evaluation of progress towards its stated goals.

Chapter 5: Safe and nutritious food

The NFP acknowledges the growing burden of diet-related diseases, however it approaches this as an issue of poor consumer food choices. Many of the proposed solutions are therefore based on education of consumers to make better choices without acknowledgement of the obesogenic environment including the abundance of readily available, cheap and poor nutritional quality food. This chapter includes no new initiatives, but instead lists current government food-related activities such as the development of the Healthy Weight Guide and the national nutrition policy. It makes no attempt to introduce new initiatives or integrate activities with other food related policies in non-health areas. Government has outlined a passive role for itself in this chapter, for example seeking only to monitor self regulation of advertising of unhealthy foods to children. There is a disappointing lack of clarity about the actions that government proposes to address the key issues and a lack of recognition that the primary purpose of food is to support good health.

The ACDPA believes that government should take a stronger leadership role in addressing the major issues to ensure the supply of accessible, high quality food and proposes the following:

- Increase the speed of initiatives for food reformulation by boosting funding and increasing the priority of the Food and Health Dialogue;
- Develop a comprehensive Nutrition Policy which includes measurable performance indicators including timeframes;
- Lead food reformulation efforts by setting mandatory targets and timelines for processed food content of fat, added sugar and salt;
- Include targets and timelines for population intake of fats, added sugars and salt;
- Include targets for improvement of nutrition to vulnerable populations such as low socioeconomic populations and indigenous peoples;
- Introduce mandatory labelling of trans fats on food products;
- Introduce pre-market approval processes for general level health claims;
- Include planned evaluation of short, medium and long term outcomes, such as the proposed Australian Health and Nutrition and Physical Activity Survey;

- Include public health evaluation expertise eg from the Australian National Preventive Health Agency;
- Government should model the behaviours in its messaging ie the public sector should introduce mandatory criteria for the purchase of nutritious and sustainable food;
- Government should introduce legislation to ban the advertising of unhealthy foods and beverages to children;
- Government should investigate options for use of taxation of unhealthy foods and subsidies of healthy foods to influence food choices and make healthy choices more accessible;
- Begin the investigation of taxation on unhealthy foods and beverages with an investigation on the benefits of taxation of sugar sweetened beverages;
- Help consumers make more informed food choices by introducing an agreed, consumer tested, mandatory, interpretive Front of Pack food labelling system and supporting this with an intensive social marketing campaign.

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References

1. Haby, M and Marwick, A (2008) Future prevalence of overweight and obesity in Australian children and adolescents, 2000-2025. Victorian Department of Human Services.
2. Access Economics. The growing cost of obesity in 2008. Diabetes Australia: Canberra, 2008.
3. UK Cabinet Office. Food Matters: Towards a Strategy for the 21st Century The Strategy Unit. Accessed 20 September 20122008 [cited 20th September 2012]; Available from: http://webarchive.nationalarchives.gov.uk/+http://www.cabinetoffice.gov.uk/media/cabinetoffice/strategy/assets/food/food_matters1.pdf