

AUSTRALIAN CHRONIC DISEASE PREVENTION ALLIANCE



Submission: Issues Paper to Inform Development of a National Food Plan

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

ACDPA 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.¹

This submission supports and complements submissions from individual members of ACDPA.

Summary of key points

- A nutritious, safe and sustainable food supply is essential to support population health as well as economic and social wellbeing.
- Public health and good nutrition must be a core element of a national food plan which needs to be integrated with a national nutrition policy.
- The vision for an integrated food and nutrition plan should be “a safe, nutritious, affordable, secure and environmentally sustainable food system, accessible to all Australians for health, wellbeing and prosperity now and into the future”.
- The contemporary epidemic of obesity and overweight in Australia is an indictment of a food system that is failing to meet population nutritional needs. There is an urgent need for a fundamental shift in food supply and demand to support and achieve population dietary patterns in line with dietary guidelines. Development of the national food plan presents an historic opportunity to address this challenge.
- A key objective of a national food and nutrition plan must be to drive change within the food system to increase supply and demand of healthy foods and to decrease supply and demand for unhealthy products to improve population health and wellbeing. Current policy and legislation fails to adequately address supply-side dynamics in food production and retailing and over-emphasises consumer demand in the achievement of a healthy diet.
- Development and implementation of the national food and nutrition plan should be overseen by the Council of Australian Governments and should be underpinned by a clearly articulated, adequately resourced implementation plan with target outcomes and timelines.
- Assessment of food security must take into account both the quantity and the nutritional quality of the food supply.
- A major risk to Australia’s food security is the risk that the food system may not be adequate to support and meet the nutritional needs of the Australian population. Current availability of fruit and non-starchy vegetables in Australia may be inadequate to meet needs if everyone ate according to the dietary guidelines while at the same time the food system offers and promotes large quantities of energy dense, nutrient poor foods and beverages.
- Specific programs must be implemented to address food security issues in disadvantaged groups and those living in remote areas.
- In developing a national food and nutrition plan, the following factors must be addressed
 - Social determinants of poor dietary habits including the social, economic, cultural, environmental and physical factors affecting food choices
 - Restrictions on marketing and promotion of unhealthy foods to children. Given the failure of self-regulatory approaches, government regulation must be introduced to restrict advertising of unhealthy foods to children as soon as possible.
 - Incentives and strategies to encourage industry to reformulate and innovate to improve the availability of healthy foods and reduce the availability of unhealthy foods. Mandatory targets for food reformulation should be introduced if current voluntary processes prove too slow or ineffective.
 - Measures to improve the nutritional value of foods eaten away from home. Legislation requiring standardised information on the nutritional value of foods at point of sale in fast food and chain restaurants should be introduced as soon as possible.

- Food labelling to assist consumers to identify healthier food choices. A single standardised front-of-pack food labelling system that presents nutrition information in an easy to interpret format should be implemented on a mandatory basis as soon as possible.
- Urban planning measures to improve access to healthy foods.
- Fiscal interventions such as taxation, grants and subsidies should be further considered to assess their potential to support improved dietary behaviours, prioritising consideration of a tax on sugary drinks of low nutritional value.
- Social marketing and education strategies to improve nutritional awareness and encourage people to improve the quality of their diet
- Measures to improve the competitiveness and efficiency of the food production and processing sectors are important but must be balanced against the needs of population health.
- A safe and environmentally sustainable food system is important to ensure the continuing availability of enough healthy foods to meet the population's nutritional needs into the future.

Introduction

ACDPA commends the Australian Government for its commitment to establish Australia's first National Food Plan to comprehensively address all aspects of Australia's food policy. We particularly commend the Government for recognising the need to include health and nutrition as an important component of a national food plan. We consider that it is essential that public health and good nutrition are placed at the core of a National Food Plan because of the importance of good nutrition in securing population health and wellbeing and the critical role of the food industry in delivering a food system that meets the nutritional needs of the population.

We strongly support the development of a national food plan to ensure the safety, security, nutritional value and economic and environmental sustainability of Australia's food supply into the future. We welcome the opportunity to provide input to the development of the plan. While we support the need to address sustainability and industry efficiency and productivity within a national food plan, the focus of our comments in this submission will be on issues relating to health and nutrition.

Background

The impact of poor dietary habits

Poor dietary habits increase the risk of developing chronic diseases and are a major contributor to overweight and obesity which further increase chronic disease risk.² Chronic diseases are the leading cause of death and disability in Australia and generate substantial economic costs both in terms of direct healthcare costs and in lost productivity.^{3 4} Allocated health expenditure for cancer, cardiovascular disease and diabetes alone totalled nearly \$11 billion in 2004-05 or around one fifth of total allocated health expenditure.⁵

The burden of chronic diseases is expected to grow significantly in line with the aging of the population and increasing prevalence of shared chronic disease risk factors such as poor diet and overweight and obesity.

Chronic diseases also have a major impact on global productivity and economic development and have been identified by the World Economic Forum as a major risk to the global economy.⁶ They reduce productivity and household income, impose significant health care costs on families and economies and increase health inequity.⁷

Australian dietary habits

Generally, most Australians do not eat according to dietary guidelines. While there is no recent comprehensive information available regarding the dietary habits of Australian adults, the National Health Survey shows that 94% of people over 15 years of age do not consume enough fruit or vegetables.⁸ For children, more detailed information is available from the *National Secondary Students' Diet and Activity Survey 2009-10* and the *2007 Australian National Children's Nutrition and Physical Activity Survey*, both of which indicate the extent of poor dietary habits amongst Australian children and adolescents:

- Vegetable consumption is inadequate across all age groups. Vegetable consumption is highest amongst 4-8 year olds, but even in this category only 22% of children meet recommended consumption levels. Alarming, only 5% of 14-16 year olds meet the recommended level of 2-4 serves of vegetables per day.
- Fruit consumption drops dramatically in older children. While around 90% of children in younger age groups meet recommended fruit consumption levels, only 24% of 14-16 year olds meet recommended levels of 1-3 serves of fruit per day.
- Only 16-22% of children meet the recommendation to limit saturated fat to less than 10% of total energy intake.

- Only 21-39% of children meet the recommendation to limit intake from sugars to less than 20% of total energy intake
- Consumption of sodium exceeds the recommended upper levels in all age groups
- Only 20-50% of boys over 4 years and just 2-10% of girls consume the recommended serves of cereals (bread, pasta, rice, breakfast cereals), although consumption of cereals in other products such as cakes, biscuits and pastries, is significant.
- Dietary intake of calcium rich foods declines through childhood, especially in girls, likely reflecting the replacement of milk with sweetened beverages.⁹

Australian children and adults also consume excessive amounts of “extra” foods, being energy dense, nutrient poor foods. “Extra foods “contribute over one third of the daily energy intake of adults¹⁰ and 41% of the daily energy intake of children.¹¹

Overweight and obesity

Currently, nearly two in three Australian adults¹² and one in four Australian children¹³ is overweight or obese. Prevalence is even higher in lower socio-economic groups and among Indigenous Australians.¹⁴ The most disadvantaged children in Australia for example, are twice as likely to be overweight or obese as the least disadvantaged children.¹⁵

Overweight/obesity imposes massive health, economic and social costs on Australia. It is a major driver of chronic disease, accounting for 54.7% of Australia’s disease burden for type 2 diabetes, 19.5% for cardiovascular disease and 3.9% for cancer in 2003.¹⁶ Nearly one million Australians suffer from these diseases as a result of obesity,¹⁷ which is now overtaking tobacco as the largest preventable cause of the disease burden in Australia.¹⁸ Obesity alone was estimated to cost Australia \$58 billion in 2008¹⁹ and this cost will continue to increase as obesity becomes more prevalent. In addition to the health system costs it imposes, obesity is a major cause of lost productivity. Productivity losses due to obesity were estimated to be \$3.6 billion in 2008.²⁰

Based on past trends, and without effective interventions in place, 6.9 million Australians are likely to be obese by 2025.²¹ Future health care costs will surge as a result of obesity-driven increases in chronic disease rates. Health system costs for diabetes alone are expected to jump from \$1.3bn in 2002-03 to over \$8bn in 2032-33, primarily due to increased obesity rates.²²

Scope of the National Food Plan

ACDPA considers that it is essential that public health and good nutrition are placed at the core of a National Food Plan. Improving population wide dietary patterns will be a critical component in reducing Australia’s future chronic disease burden and a national food plan which incorporates public health objectives has an essential role to play in achieving this outcome. This will require the scope of a national food plan to be broadened to address food policy from “paddock to population health” rather than just “paddock to plate”.

Consideration of the food system cannot be divorced from its primary purpose of meeting the population’s nutritional needs. While a competitive, productive and efficient food industry is important, this must be balanced against the needs of population health.

Consequently we consider that the food plan needs to be integrated with a national nutrition policy within a broader food and nutrition framework, as recommended by the National Preventative Health Taskforce. This will ensure a co-ordinated approach which offers benefits for population health as well industry productivity.

A national food and nutrition plan needs to address both supply and demand side factors affecting population food choices. Historical epidemics of food-borne infectious disease were met by comprehensive reforms to the food supply through food safety legislation and regulation. The health impact of the food-related contemporary epidemic of obesity, overweight and chronic disease, demands a comparable response.

ACDPA considers that current levels of obesity and overweight and poor diet in Australia are an indictment of a food system that is failing to meet the nutritional needs of the population. There is a major disconnect between what we are eating and what we should be eating as outlined in the Dietary Guidelines for Australians.

A fundamental shift in the food system is required to help achieve dietary patterns consistent with the dietary guidelines if we are to reduce the enormous cost of diet and obesity-related disease and improve population health outcomes. This will require an increase in supply and demand for healthy foods and a decrease in supply and demand for unhealthy foods which are high in saturated fats, salt and sugar. Achieving this shift must be one of the key objectives of an integrated national food and nutrition plan.

A national food and nutrition framework would guide actions by different parties to achieve the necessary shift required in our food system to improve diets and population health outcomes and would incorporate the wide range of work already being done on food issues and bring it all together under the one plan. Much of this work has been referred to in the issues paper, but we would particularly like to highlight the importance of incorporating the following:

- *Australia: The Healthiest Country by 2020* - the final report of the National Preventative Health Taskforce which recommends the development of a National Food and Nutrition Framework as well as strategies to improve
- *Labelling logic* – the review of food labelling law and policy which includes amongst its recommendations the development of national nutrition policy
- The Food and Health Dialogue - the Dialogue is led by the Federal Government and its role is to work with the food industry and public health groups to set voluntary targets for food reformulation across a range of commonly consumed foods.

The national food and nutrition framework should be underpinned by a clearly articulated, adequately resourced implementation plan with target outcomes and timelines. A formal mechanism must also be established to develop and implement the plan. Because of the broad scope of the plan a cross-sectoral, whole of government approach, including national, state, territory and local governments, must be adopted for implementation. For this reason we consider that the development and implementation of the plan should be overseen by the Council of Australian Governments.

Q 1. What is the most important thing you think a national food plan should try to achieve?

While we recognise that an effective food policy needs to integrate health, social, economic and environmental considerations we consider that the most important priority for the plan should be to drive change within the food system to support and achieve population dietary patterns in line with dietary guidelines to improve population health and wellbeing.

Q 2. What do you think the vision and objectives of a national food plan should be?

The vision for an integrated food and nutrition plan should be “a safe, nutritious, affordable, secure and environmentally sustainable food system, accessible to all Australians for health, wellbeing and prosperity now and into the future”.

This plan needs to provide a comprehensive and consistent approach to all aspects of food policy covering the key areas outlined in the Issues Paper, namely food security, a nutritious and safe food

supply, a competitive, productive and efficient food industry, food industry sustainability and trade opportunities. In addition the plan should include a strong emphasis on achieving dietary behaviours which more closely align with the dietary guidelines by improving nutrition awareness and driving change to food supply and demand towards healthier foods and beverages.

The objectives should include:

- To ensure a sufficient, safe and healthy food supply which meets the nutritional requirements of the Australian population and supports healthy eating patterns
- To achieve healthier diets by supporting Australian consumers to understand, choose and consume a high quality diet in line with dietary guidelines
- To ensure that healthy foods are affordable and accessible for all Australians, including those in disadvantaged and rural or remote communities
- To contribute to food security at a community, national and global level
- To support a robust, adaptable, innovative, prosperous and internationally competitive food system from production through to processing, retailing and consumption
- To foster the environmental sustainability of the Australian food industry.

Food Security

Q.4 What does food security mean to you? How would this be achieved? How would we know if/when we are food secure?

ACDPA endorses the United Nations Food and Agriculture Organisation's definition of food security:

“When all people, at all times, have physical, social and economic access to sufficient, safe, and nutritious food to meet their dietary needs and food preferences for an active and healthy life.”²³

In particular we note that the definition highlights nutritious food and emphasizes the purpose of food security as enabling an active and healthy life, underscoring the fact that food security relates not just to the quantity of food available but also to its nutritional quality.

There are three main dimensions to food security which need to be addressed within a national food plan:

- Physical availability of food, which relates to having sufficient quantities of nutritious food available on a consistent basis. This can be influenced by factors such as the location and accessibility of food outlets, as well as the quality and variety of food they provide.
- Food accessibility, which includes food affordability as well as the ability to physically access appropriate foods for a nutritious diet. This is influenced by an individual's finances, culture and mobility as well as the distance to food outlets and the availability of transport.
- Food utilisation, which relates to how people use food including preparation, cooking, storage and safety. It is influenced by nutritional knowledge, food preferences and social and cultural factors, including time availability to prepare healthy food.^{24 25}

Food insecurity in Australia is estimated to affect 5% of the population. Certain groups however are more susceptible to food insecurity including low income earners and disadvantaged groups such as indigenous Australians.²⁶

There is a link between food insecurity, socio-economic status, diet quality and higher rates of overweight and obesity and this may be because people who experience food insecurity or who have low incomes rely on energy dense, nutrient poor foods which provide a relatively cheap source of energy.^{27 28} The affordability of healthy foods is an important issue for those living on low incomes. A

2007 study of healthy food costs in NSW for example found that low income families in NSW would have to spend on average 56% of their household budget to maintain a healthy diet compared to 22% for a family on an average income.²⁹ A similar study in Adelaide found the families on welfare payments and low incomes would need to spend 28–34% of their income in order to be able to afford a healthy food basket.³⁰

Research suggests that environmental factors may also influence nutrition³¹ with lower socio-economic and minority neighbourhoods generally having poorer access to healthy food and supermarkets and greater availability of fast-food restaurants and energy dense foods.³²

Food insecurity is a major problem in remote areas of Australia and the greater proportion of Indigenous Australians living in these areas means they are particularly affected. In 2004–05, approximately 24% of Indigenous Australians aged 15 years and over reported they ran out of food in the 12 months before the survey compared with 5% of non-Indigenous Australians.³³ Limited availability and higher costs for healthy foods are important factors exacerbating food insecurity in remote areas, influenced by freight costs, infrequent deliveries, lack of proper storage and poor economies of scales.³⁴

Specific programs must be implemented to address food security issues in disadvantaged groups and those living in remote areas.

The need to assess 'nutrition security'

At a population level, any assessment of food security needs to take into account both the quality and quantity of food available. While Australia produces abundant quantities of food the quality may not be consistent with Australians consuming a diet that aligns with the dietary guidelines. For example, there is some indication that current availability of fruit and non-starchy vegetables in Australia may be inadequate to meet needs if everyone ate according to the dietary guidelines.³⁵ The food supply also offers and promotes large quantities of energy dense, nutrient poor foods and beverages.

Consumer choices and behaviours (which relate to food utilisation) are also an important component of food security. A recent report on Australia's food security noted that "[p]erhaps Australia's most serious food security issue relates to the ways in which we consume and use food. Poor nutritional choices made by many in our community are developing into an increasingly important public health issue."³⁶

Current levels of obesity and overweight and poor diet in Australia are an undeniable sign that the food system is failing to meet the population's nutritional needs and that a fundamental shift in food supply and demand is required to support population health.

Strategies to address food insecurity

Both population-wide strategies and targeted strategies will be required to improve food security in Australia. Population-wide strategies include social marketing and education strategies, food reformulation, improved easy-to-understand food labelling and restrictions on advertising of unhealthy foods (see Nutritious and Safe Food Supply below for more detail).

Targeted strategies to address food insecurity at the community and individual level will also be required to address the social determinants of food insecurity in population sub-groups and could include

- Food aid programs to assist those experiencing severe food insecurity
- Urban planning to improve the nature and distribution of local food outlets, improve transport options and encourage the local availability of produce (eg local produce markets, urban agriculture and community gardens)
- Community transport and food delivery options for those with limited mobility or transport options

- Food education programs focussing on shopping, budgeting and cooking skills for healthy meals
- Specific programs to improve access and affordability of healthy foods in disadvantaged and remote areas such as the Remote and Indigenous Stores and Takeaways project
- Subsidised school fruit/breakfast programs.³⁷
- Programs to enhance health literacy, which is lower in low socioeconomic groups.³⁸

Q3. What do you see as the major risks to Australia's food supply in the coming years and decades? How could they be avoided or managed more effectively

A major risk to Australia's food security is the risk that the food supply may not be adequate to support and meet the nutritional needs of the Australian population, as outlined above.

Other risks to Australia's food supply include:

- Population growth and increasing food prices
- The impact of climate change and extreme weather events
- Degradation of soils and the environment through unsustainable agricultural practices
- Urban and mining encroachment on arable land
- Inadequate water supply
- Inadequate R&D and extension services to improve agricultural productivity
- Social and geographic inequities relating to poor access to and affordability of healthy foods for disadvantaged and vulnerable groups, including people living in rural and remote areas of Australia
- Inefficient and non-competitive food production, processing and retailing sectors.

These risks could be avoided or managed more effectively within an overarching food and nutrition framework which focuses on achieving population health and environmental sustainability as well as a competitive, productive and efficient food industry.

Securing a nutritious and safe food supply

A nutritious and safe food supply is essential to support population health as well as economic and social wellbeing. As outlined in previous sections, ACDPA considers that a national food plan needs to be integrated with a national nutrition policy to drive change within the food system to support and achieve population dietary patterns consistent with dietary guidelines.

There is an urgent need to reconfigure policy settings to achieve a fundamental shift in our food production, processing, retailing and service sectors to support healthier dietary patterns. This shift will require an increase in supply and demand for healthy foods and a decrease in supply and demand for unhealthy foods which are high in saturated fats, salt and sugar.

We commend the Government for including a range of issues and drivers in relation to a nutritious and safe food supply in the Food Plan Issues paper. However, we consider that it is essential that the following factors are also addressed within a comprehensive food and nutrition plan.

Social determinants

A range of social, economic, cultural, environmental and physical factors affect food choices. At a societal level we live in an environment which promotes obesity by providing an abundant and easily accessible supply of cheap, energy-dense foods while reducing the need for physical activity. At the same time, increasingly busy lifestyles have created a rising trend towards consumption of

convenience and pre-prepared foods and of meals eaten away from home. This trend has been identified as a major contributor to growing levels of obesity and overweight in Australia.³⁹

At the individual level, food choices can also be affected by personal preferences, food preparation skills, income and levels of health and nutrition literacy as well as the physical accessibility and affordability of foods and beverages. There is a strong social gradient to poor nutrition and obesity and overweight with prevalence increasing in line with disadvantage.⁴⁰

The physical environment is also a factor with studies suggesting that improved access to healthy foods may increase their consumption⁴¹ and that neighbourhoods with better access to supermarkets, limited access to convenience stores and fewer fast food outlets tend to have healthier diets and lower levels of obesity.^{42 43}

Addressing these social determinants will require a range of strategies with an emphasis on making healthy choices the easy choices.⁴⁴

Social marketing and education strategies

Social marketing and education strategies are an important approach to improve nutritional awareness and encourage people to improve the quality of their diet.

Evidence indicates that social marketing campaigns are likely to be most effective if they are part of a comprehensive approach to improving population health behaviours; are based on sound target group research; provide frequent, widespread and ongoing mass media exposure to campaign messages, especially for ongoing behaviours; and are supported by complementary policies and programs to support behavioural change.⁴⁵ In addition, social marketing campaigns are likely to have the greatest impact when competing marketing messages, such as advertising of unhealthy foods and beverages, are restricted.⁴⁶

Food industry role in shaping demand

The food industry plays an important role in shaping consumer demand and consumption despite the suggestion in the Issues Paper that they simply respond to what the consumer wants.

Both the range of foods and beverages offered by the food industry and the way those foods and beverages are packaged, marketed and promoted have a strong influence on consumer demand and consumption.

For example there is a substantial body of evidence that food advertising to children independently influences their food preferences, purchasing requests and consumption, as well as their dietary habits and health status.^{47 48} Children in Australia are exposed to high volumes of unhealthy food advertisements on television as well as through other non-broadcast media. Up to 50% of food advertising during television programs popular with children are for unhealthy foods and beverages that are high in fat, salt and sugar.⁴⁹

In addition to creating demand for unhealthy foods, high levels of unhealthy food advertising can undermine healthy eating messages in social marketing campaigns for healthy foods and lifestyles, limiting their effectiveness.⁵⁰

Despite the introduction of self-regulatory schemes to restrict advertising of unhealthy foods to children both for groceries and quick service restaurants there has been no decline in unhealthy food advertising during children's peak television viewing times.^{51 52}

Given the failure of self-regulatory approaches, government regulation must be introduced to restrict advertising of unhealthy foods to children.

Food composition

Many processed foods are high in salt, sugar, fat and energy and low in overall nutritional quality so improving the nutritional quality of the food supply through product reformulation and innovation has enormous potential for improving population nutrition and health.⁵³ Reducing portion sizes of processed foods, which have increased substantially in recent years, also has the potential to decrease energy intake as evidence indicates that people tend to consume more kilojoules when they are presented with larger portions of food and beverages.⁵⁴

The current Food and Health Dialogue is a valuable initiative to drive reforms in this area, but more support must be provided to increase the range of food products covered to accelerate improvements in the nutritional profile of processed foods and within the fast food sector. Consideration should also be given to setting mandatory targets for food reformulation which are more likely to achieve greater benefits than voluntary targets.⁵⁵

Food labelling

Food labelling can be used to support health promotion initiatives relating to encouraging healthier eating habits if it provides nutrition information in a format that makes it easy for people to identify healthier food and beverage choices.

ACPDA strongly supports the development and mandatory introduction of a single standardised front-of-pack food labelling system for processed foods in Australia that presents nutrition information in a format that is easy to interpret at a glance and that is easily understood by consumers, particularly those in lower socio-economic groups where obesity is more prevalent. In addition to assisting consumers to identify healthy choices appropriate nutrition labelling can provide an incentive for manufacturers to increase the availability of healthier products through product reformulation and innovation.

The percentage daily intake system of food labelling introduced voluntarily by the Australian Food and Grocery Council is not generally supported by public health groups because it can be difficult for consumers to interpret and generally performs more poorly than other systems in assisting consumers to correctly identify healthier food products. In particular, the percentage daily intake system is least understood by people in most disadvantaged groups who are less likely to be able to use this system effectively.^{56 57}

Food eaten outside the home

Foods eaten away from home are an important contributor to Australian diets. In 2009, 3.7 billion meals were served by commercial food outlets, of which 1.6 billion were from fast food outlets.⁵⁸ Foods eaten away from home are generally more energy dense and portion sizes are relatively larger than for foods prepared at home.^{59 60} Frequent fast food consumption (twice a week or more) is strongly associated with weight gain over time.^{61 62}

The increasing contribution to our diets of foods eaten outside the home makes them an important target for a comprehensive food and nutrition plan. Initiatives to increase the range of healthy options available when eating out, together with nutrition labelling on menus to provide consumers with the information they need to make healthier choices should be introduced as soon as possible. Nutrition labelling on menus may also encourage food service outlets to improve the nutritional profile of the foods and beverages they offer.

Fiscal interventions

Economic interventions, such as taxation, grants and subsidies may provide incentives or disincentives to support improved dietary behaviours.

Reviews of the effects of food taxes and subsidies on obesity levels have suggested that nontrivial pricing changes could contribute to healthy consumption patterns,^{63 64} especially for children and

adolescents and low socio-economic populations.⁶⁵ Sugary drinks have been identified as a potential target for taxation because of their association with increased body weight and their low nutritional value.^{66 67} The ACE-Prevention report identified a 10% tax on unhealthy foods as a key preventive health intervention for Australia, with the potential to both improve health and achieve net cost savings.⁶⁸

However, there are concerns that taxing unhealthy foods would disproportionately affect lower income earners who spend a higher proportion of their income on food than higher income earners.⁶⁹

In general, available evidence about the effectiveness of food taxes and subsidies suggests that taxes and subsidies influence consumption in the desired directions, so further consideration of this approach is warranted, particularly in relation to sugary drinks which usually have low nutritional value. Before implementing these approaches, careful modelling of the impact on diet across population groups is required.⁷⁰

Urban planning

Urban planning has the potential to encourage healthy eating through measures such as retail planning to manage the availability of and access to healthy food, including access to supermarkets and food markets, and allowing space for urban agriculture, either communally or on individual plots.⁷¹ Limiting the density of fast food outlets, especially near schools and in socially disadvantaged neighbourhoods is also an important measure that can be adopted and is recommended by the World Health Organisation.⁷²

A competitive, productive and efficient food industry.

ACDPA recognises the benefits of a competitive, productive and efficient food industry and supports measures to assist in achieving these objectives. In particular, the food industry needs to be supported to add value in ways that enhance health rather than undermine it, for example by developing healthier product ranges rather than encouraging increasing consumption of unhealthy products.

It is important that measures to improve the competitiveness and efficiency of the food production and processing sectors do not come at the expense of population health. For example, policies which support increased production and unfettered marketing of energy dense, nutrient poor foods may increase food industry profits but will result in unacceptable costs to health.

The challenge of improving dietary habits offers many opportunities for the agricultural and food processing sectors in Australia to expand and to innovate to develop a healthier range of food and beverage products. For example in 2004, it was estimated that increasing fruit and vegetable consumption by one serve per day per person would boost the horticulture industry by \$430 million dollars to \$1.33 billion per year.⁷³

Research and development assistance should be provided to industry to assist them in developing healthier food products. Education and training should also be provided to improve nutrition and health skills within food industry.

With respect to industry regulation, we support harmonisation and streamlining of regulation to reduce the unnecessary regulatory burden on industry. However, current levels of poor diet and overweight and obesity are a clear sign of the failure of the current food supply to support public health. Increased government regulation is required in some areas to address market failure, in particular to restrict marketing of unhealthy foods to children and to implement a single standardised front-of-pack food labelling system for processed foods that presents nutrition information in a format that is easy to interpret at a glance.

While costs to industry need to be considered in determining whether regulatory intervention is justified, it is important to balance these costs against the high costs to the health system and society of current levels of obesity and overweight. This cost was estimated to be \$58bn in 2008,⁷⁴ or over half the value of the Australian food industry, estimated to be \$100bn.⁷⁵

Sustainable food industry

A safe and environmentally sustainable food system is important to ensure the continuing availability of enough healthy foods to meet the population's nutritional needs into the future.

There is a synergy between healthier diets and sustainable food production. Meats and highly-processed energy-dense foods produce more greenhouse gas emissions than fruit and vegetables, so reducing consumption will have benefits both for industry sustainability and population health.⁷⁶

Reducing food wastage is an important objective with the cost of food waste in Australia estimated to be \$5.3 billion each year⁷⁷. Despite concerns about higher food prices, Australian consumers throw away up to a third of the fresh produce they purchase.⁷⁸ Food waste also contributes to unnecessary greenhouse gas emissions.⁷⁹ Improving processing storage and transport systems and improving consumer awareness of how best to store and prepare foods could help to reduce food waste, saving money and helping the environment. Research into drivers of wastage and how wastage could be reduced across the food chain is required.

Conclusion

The development of a national food plan presents an enormous opportunity to reconfigure Australia's food system to meet the health needs of Australians, while maintaining a competitive, dynamic and environmentally sustainable food industry. We look forward to continuing to contribute to further consultations on its development.

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