Submission from Cancer Council Australia
National Food Plan Green Paper

Cancer Council Australia appreciates the opportunity to provide the following submission in response to the National Food Plan Green Paper. Cancer Council has previously provided a detailed submission on the National Food Plan Issues Paper that was released for consultation in 2011.

About Cancer Council Australia

Cancer Council Australia is Australia’s peak national non-government cancer control organisation. Its members are the eight state and territory cancer organisations working together to undertake and fund cancer research, prevent and control cancer and provide information and support for people affected by cancer.
Cancer Council Australia’s goal is to lead the development and promotion of national cancer control policy in Australia, in order to prevent cancer and reduce the illness, disability and death caused by cancer.

As outlined in our previous submission, there is convincing evidence that overweight and obesity are risk factors for cancers of the bowel, kidney, pancreas, oesophagus, endometrium and breast (in postmenopausal women).\(^1\) There is also a strengthening body of evidence about the association between specific foods and food groups and cancer risk\(^1\) Fruit and vegetables play an important role in weight management but recent studies also suggest that fruit and vegetables are protective against oral, laryngeal, oesophageal, colorectal and lung cancers.\(^1\)

Evidence is now building for the importance of wholegrain foods in cancer prevention as dietary fibre in wholegrains and fruits and vegetables probably decreases the risk of bowel cancer.\(^1\)

Our organisation supports the development of a National Food Plan because of the clear link between healthy eating, poor or inadequate nutrition, body weight and some cancers. We believe that a National Food Plan that brings together all elements of the food system is vital to ensure the health of the Australian population as well as a dynamic and competitive food industry, while limiting the negative effects of food production, processing and consumption on the environment.

Prioritising public health

In its previous submission, Cancer Council outlined concerns that the issues paper fails to fully explore the impact of the food supply and Australia’s food system on the health and wellbeing of the nation, prioritising instead the ‘health’ of Australia’s food industry. Cancer Council remains concerned that this Green Paper continues to have a strong focus on economic growth and increased food production and processing but does little to strengthen the focus on promoting the availability of an affordable,
nutritious and sustainable food supply, and creating an environment that makes healthier choices easier.

The Green Paper attributes issues of unhealthy eating, obesity and associated chronic diseases solely to poor food choices by individuals. As a result, the strategies for addressing nutrition issues are soft policy options such as “educating consumers on healthy food choices”. This has been the approach used by governments for decades and there is little evidence to suggest it is effective in the long-term.

The World Health Organisations Global Strategy on Diet, Physical Activity and Health recommends that to address poor diet, obesity and associated chronic diseases governments should use a broad range of measures from fiscal policies such as taxation, subsidies or direct pricing to policies around labelling requirements, food claims, food advertising and sponsorship by food and beverage companies. The strategy also identifies that national food and agricultural policies should be consistent with the promotion of public health. (2)

Like the issues paper, the Green Paper fails to fully appreciate the economic imperative to realign Australia’s food system to provide a healthier and more sustainable food supply. In 2008, the cost of overweight and obesity to Australian society was estimated to be $58 million. (3) When the costs of productivity losses attributed to obesity were considered, the true cost of obesity to society escalated to a massive $3.6 billion. (3) These figures support stronger recognition of the massive cost to the economy of diet-related disease in Australia and the need for clear measures to reduce these costs.

Given the increasing prevalence of overweight and obesity and preventable diet-related diseases, and the associated health and economic costs there needs to be a higher priority given to public health. The National Food Plan must form part of a comprehensive approach to reducing obesity in Australia, particularly among children. It should respond to a range of recommendations made by the National Preventive Health Taskforce to realign the food supply to support and promote healthier choices, to protect children from marketing of unhealthy foods and drinks; to improve public education, information and labelling; reduce barriers and improve access for disadvantaged communities; and to regularly monitor health and nutrition of the population. (4)

The National Food Plan presents an enormous opportunity to reconfigure Australia’s food system to meet the health needs of the Australian population, while maintaining a competitive and dynamic food industry. This would mean focusing investment in producing foods that are consistent with recommended eating patterns outlined in the Australian Guide to Healthy Eating (5) and the Dietary Guidelines for Australians (6) ensuring sufficient production of a wide variety of fruits, vegetables, wholegrain foods, legumes, lean meats and dairy products in a safe, affordable and environmentally sustainable way.

The National Food Plan should better support Australian farmers so that fresh produce is more readily available to all Australians, including those in remote communities. This would mean a shift away from manufacturing and importing highly
processed ‘energy dense, nutrient poor’ foods or value-added ‘healthy’ products that are too expensive for many Australians. It will be difficult to advocate for the population to eat a healthy diet if nutritious food is not readily available, affordable and safe to consume.

Population health strategies for the National Food Plan

The National Food Plan is an opportunity to implement population wide strategies that promote healthier choices. Cancer Council is disappointed that the Green Paper does not identify any new opportunities to better align public health priorities with food production and manufacturing. Instead the report reiterates what had already been committed but fails to integrate these within the National Food Plan.

Population-wide strategies that should be addressed in the National Food Plan include:

1. Accelerating food reformulation – Food reformulation has enormous potential for achieving improvements in the population’s intake of nutrients that make the greatest contribution to chronic disease e.g. kilojoules, saturated fat, added sugars and sodium. The current food reformulation initiatives undertaken by the Australian Food and Health Dialogue are moving too slowly, with only six categories addressed while the UK has achieved meaningful reductions across 80 categories and sub-categories. Cancer Council would like to see this fast tracked to drive major population health benefits.

2. Establishing limits for the amount of saturated and trans fat, salt and added sugars – Given the slow progress of the Australian Food and Health Dialogue, Cancer Council believes that it is time to consider implementing mandatory measures to limit the amount of salt, added sugar and saturated and trans fat in the food supply. If the current voluntary approach fails to deliver meaningful changes across the food supply, government must implement mandatory measures.

3. Reducing portion sizes in pre-packaged and fast foods – Similar to food reformulation, another strategy for reducing the health burden caused by consumption of highly processed foods is to reduce and standardise portion sizes. In a number of food categories, portion sizes have increased substantially over the last 20-30 years, meaning that consumers unintentionally consume more fat, sugar, sodium and kilojoules per meal. Smaller portion sizes have been shown to be an effective tool for reducing energy intake and associated overweight and obesity. (7-10)

4. Introducing nutrition labelling on fast food menu boards nationally – A nationally-consistent approach for the declaration of nutrition information for standard fast food items on menu boards should be developed. While energy (kilojoule) information should be the immediate priority, the declaration of saturated fat, sugar and/or sodium content should also be considered. We recognise that the NSW Government has already introduced such a system.
and we understand that a national approach is already being discussed by members of the Food Regulation Standing Committee.

5. **Adopting a mandatory, interpretive front of pack labelling system** – Cancer Council understands that the Commonwealth Government is currently leading the development of a front of pack food labelling system for use in Australia. Cancer Council is one of a number of public health organisations that is represented on the various advisory committees and working groups.

We continue to support the development of an interpretive front of pack labelling system that enables consumers to make healthy choices at a glance. Our preference is for a system that utilises traffic light colours to interpret the level of saturated fat, sugars and sodium per 100g/100mL of a product as our research has demonstrated this approach to be the most helpful for consumers.\(^{11}\) We understand that the final design may not use traffic light colours however, we advocate comprehensive consumer testing of label concepts to ensure that the final design is effective in helping consumers to identify healthier food choices at a glance.

While we understand that the proposed approach may be voluntary in the first instance, we believe that the full potential of such a nutrition labelling scheme can only be achieved if it is mandatory across all packaged foods.

6. **Implementing strict regulation for health claims on food labels** – Cancer Council supports the introduction of strict approval processes for the use of high and general level health claims on food labels. This includes the application of the FSANZ Nutrient Profiling Scoring Criteria to ensure claims can only be made on healthier foods, and the implementation of a rigorous pre-market substantiation process to ensure that unsubstantiated claims do not make it to market and that the public can have confidence in the claims that are used to market the health benefits of processed foods.

7. **Protecting children from the influence of unhealthy food advertisements** – International evidence demonstrates that food marketing influences children's food preferences, the foods they pester their parents to buy and ultimately what they eat.\(^{12,13}\) Comprehensive food advertising reforms must include legislated restrictions on the range of ways that unhealthy food is promoted to children taking into account both exposure and power.\(^{14}\) This includes regulation across a range of media including television, print media, online advertising and food manufacturers' websites, on pack promotions and sports sponsorship.

8. **Delivering effective consumer education campaigns** – Well-funded, ongoing consumer education campaigns should be implemented to support initiatives like reformulation, menu labelling and front-of-pack labelling as well as broader healthy eating messages promoted through the *Australian Guide to Healthy Eating*. The Australian National Preventive Health Agency should be a key partner in any National Food Plan.
9. **Exploring the use of food taxes and subsidies to promote healthier choices** - Food taxes have been proposed or introduced in a number of countries as part of efforts to improve diets, address rising rates of obesity and reduce diet-related chronic disease.\(^{(4,15-20)}\) Although consistency and strength of the effects are mixed, internationally food taxes have been shown to affect positive changes in dietary behaviours and health outcomes.\(^{(21-26)}\)

There is little Australian evidence regarding the impact of food taxes and subsidies on dietary behaviours and health outcomes, however there is evidence that a food tax is a cost-effective policy to reduce the burden of overweight and obesity in the community.\(^{(16)}\)

Government should assess the potential impact of food taxes across a range of options, including sugar sweetened beverages, and the potential role of subsidies to improve the diets of low income groups who often have the poorest diets and are more likely to suffer from chronic disease associated with unhealthy eating.

10. **Developing a National Nutrition Policy** - Cancer Council supports the recommendation of *Labelling Logic: Review of Food Labelling Law and Policy* that a National Nutrition Policy be developed as a matter of priority, to align with preventive health priorities as well as the National Food Plan.\(^{(27)}\) However, we are not aware that there has been any progress towards the development of a National Nutrition Policy. It is also unclear how the National Nutrition Policy and the National Food Plan will intersect. Cancer Council would like to see the National Nutrition Policy developed as a matter of urgency so that it is clear how the National Nutrition Policy will be integrated within the National Food Plan.

11. **Investing in regular health and nutrition surveys** - The Green Paper recognises the importance of health and nutrition data in guiding food policy. Currently, the 1995 National Nutrition Survey remains the most recent survey of Australia’s food consumption and dietary intake and continues to underpin food regulatory decisions. This data is nearly 20 years old. We acknowledge that the Australian National Children’s Nutrition and Physical Activity Survey provides more up to date data on children’s dietary intake, and that a new survey has been undertaken on the adult population, however there must be a commitment to ongoing and regular monitoring and surveillance of food consumption, nutrient intake and nutrition status so that food and nutrition policy is based on current and relevant data.

**Governance and Leadership**

Cancer Council believes that the vision for the National Food 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.

To achieve this vision, a National Food Plan needs to avoid fragmentation and silos,
ensuring policy coherence across all government departments and agencies and coordination with state, territory and local government activities, as well as the private and non-government sectors.

Cancer Council supports the establishment of a National Ministerial Food Forum (effectively a standing Cabinet sub-committee) to integrate food policy across all government departments. Dynamic, visionary leadership is required from the federal government. Cancer Council recommends that the forum should account directly to the Prime Minister and be co-chaired by the ministers for health and agriculture.

The Ministerial Food Forum should be underpinned by an integrated policy platform to guide decision-making and priority setting and outline a strategy that brings together health and economic interests and reconciles them. Examples of this approach include the UK’s Food Matters (28) and Toronto Food Plan (29).

The Ministerial Food Forum should also be informed by a Stakeholder Committee that includes equal representation from primary industries, food businesses, public health, community and consumer organisations.
References


(accessed September 2012)