



Tuesday 5<sup>th</sup> August 2008

Dietary Guidelines Secretariat  
Evidence Translation  
National Health and Medical Research Council  
GPO Box 9848  
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**Re: Updating the NHMRC Core Food Groups (1994)**

The Food and Nutrition Special Interest Group of the Public Health Association of Australia (PHAA) appreciates the further opportunity to provide the following comments on the proposed methods to update the Core Food Groups (CFGs) (1994).

Whilst the previous comments (letter dated November 20, 2007) are still relevant, the recent publication providing some details about the proposed methodology raises a number of further issues about which the Group would like to comment.

The PHAA believes the CFGs are the step where the Nutrient Reference Values (NRVs) are translated into whole foods and that this translation forms the basis of nutrition guidelines, food selection guides and nutrition education and guides food regulation and food policy decisions. However, it is neither sufficient nor desirable to focus solely on translation of NRVs but to likewise consider the role of food and dietary patterns in promoting health and ensuring nutritional adequacy. Similarly considerations regarding the environmental and social impact of food choice are equally important and should also be factored into the decision making process. These considerations should receive equal priority when considering the final food group outcome. The PHAA thus recommends it is essential that the methodology is guided and informed by the best interests in public health.

**1. Goal and purpose of the Core Food Groups**

The PHAA disagrees with the goal as outlined in the brochure circulated for comment. The PHAA believes the review of the CFGs is to translate the NRVs (Estimated Average Requirements (EAR) – see below) into recommended amounts and proportions of whole foods that are required to protect and promote population health. Future guidelines and food selection guides such as the Dietary Guidelines and the Australian Guide to Healthy Eating can provide guidance on “food consumption patterns” and different “activity levels”.

It is not the job of the CFGs to deliver the nutrient requirements for individuals or different activity levels – these are the realm of expert health professionals focussed on individual health care. Focussing on individual nutrient requirements means the review of the CFGs is driven by nutrients and not whole foods – this is a fundamental flaw in the proposed method outlined in the publication.

The proposed method goes on to describe the goal of the review being the translation of ‘the NRVs (2006) into food consumption patterns that deliver the nutrient requirements .....’. The document then goes on to discuss the formation of base/foundation diets and total diets. However, there is no consideration as to the proportion of the nutrient requirements that the core food groups will aim to meet. The previous iteration of the Core Food groups, acknowledged that ‘core food groups form the basis of, but do not constitute the total diet’ (1, p7) and a target of 70% of the RDI for all nutrients except energy was set.

The PHAA recommends that the NHMRC develop a clear statement about the purpose of core food groups and their relative contribution to the base/foundation and total diets.

The proposed method also describes the goal of the review to translate the NRVs into the food consumption patterns that “reflect the current Australian food supply and food consumption patterns..”. It is well documented in the scientific literature that current data on the food supply and food consumption patterns of Australians is inadequate at a national level. Relying on out-of-date data, and/or using data from small sample studies risks decisions being influenced by individuals or food industry with sufficient funds to publish small scale specific food item consumption data and does not necessarily reflect the true situation.

## 2. Selection of appropriate Nutrient Reference Values

Food guidance is usually about assisting people to make food choices that will provide adequate nutritional intake that is also consistent with promoting health and reducing the risk of nutrition related chronic disease. Important considerations are that the population achieve a distribution of usual intakes that has a low prevalence of nutrient inadequacy and a low proportion of intakes above the UL (2). Food guidance is delivered as population level advice and hence the appropriate reference NRV is the Estimated Average Requirement (EAR) where these exist. The scientific underpinning for the choice of the reference NRV (in this case the EAR) is detailed in the article by Beaton and further elaborated upon in the document describing the development of Dietary Reference Intakes (DRIs) (1994-2004) (3). It is also highlighted in the rationale used for the development of the Canadian Food Guide (4) and discussed by Tarasuk in her article describing the application to nutrition labelling (5).

The PHAA is concerned that there is a misunderstanding of the basis of these NRVs, that they are being inappropriately applied and that this will result in a gross overestimation of the amounts of foods required for health. This is particularly concerning if the RDI is used as the basis for determining the base/foundation diet as the extra foods required to meet energy requirements in the total diet may contribute much higher than required levels of other nutrients. In addition higher intakes of food in general may add to already high levels of overweight and obesity and will also result in a greater contribution to the environmental impact of food consumption.

We also stand by our original comments in relation to inappropriate interpretation of the Adequate Intake for certain nutrients to propose the construction of a so-called 'healthy fats' group.

### 3. Nutritional equivalence

It is not clear how nutritional equivalence is to be interpreted. Which individual nutrients or combination of nutrients will be deemed to be the most important for judging equivalence? There is concern that certain highly nutritious (and more environmentally sound) foods such as legumes will be downgraded to non core foods, simply because they don't meet the exact nutrient profile of meat. Once again we point to the Canadian experience in dealing with the place of legumes in the core foods (included with meats because of consumers using them as alternatives to meats).

### 4. Environmental sustainability

Addressing climate change through reducing greenhouse gas emission is one of the most important issues facing the planet today. The production, processing, packaging, transport, refrigeration, and consumption of food contribute significantly to greenhouse gas emission (6) and it is vital to planetary health and population health, that the CFGs are based on the consumption of environmentally sustainable foods and eating patterns. The PHAA believes that the timing of this review is opportune for Australia to be a leader in developing national food and nutrition guidelines that encompass the sustainability of our planet.

The PHAA believes the proposed methodology for considering environmental issues is inadequate. The PHAA recommends:

- The environmental impact of foods is considered in the initial formulation of the proposed 'base'/foundation diet, and not left as a token measure at the end of the proposed methodology.
- The NHMRC develops and discloses/publishes an evidence based process for assessing the environmental impact of foods. There are a variety of methodologies for assessing environmental impacts of foods and diets and we provide here a range of articles for your reference (7,8).
- Recognition is given to the environmental impact of all foods but in particular foods of animal origin, conventionally grown produce and highly processed and packaged foods.

### 5. Social Equity

The cost of food is of considerable public and political interest at present. If the CFGs are to form the basis of recommended diets in Australia, then it is fundamental that food costs and social equity are considered from the outset. Food costs need to be considered not in absolute terms, but in nutrient and energy density terms. The CFGs should be based on foods that are readily available and minimally processed, as the greater the processing the greater cost (and often energy density) and highly processed foods that have added nutrients tend to be higher cost. This will be particularly important when assessing nutrient equivalence – for example the inclusion of legumes in the 'meat and meat alternatives' food group.

It would not be appropriate or desirable to have a situation where the core foods/diet recommends consumption of highly processed, manufactured foods simply to meet nutrition targets but that disregards environmental and social equity issues.

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Thank you again for the opportunity to consult and we look forward to providing further comment on the next iteration.

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## References

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