



PUBLIC HEALTH ASSOCIATION
of Australia Inc
ABN 41 062 894 473

Project Officer – Core Food Groups (1994) update
National Health and Medical Research Council
GPO Box 1421
Canberra ACT 2601
20th November 2007

Re: Notice of Intent – Revision of the Core Food Groups (1994)

Food and Nutrition Special Interest Group of the Public Health Association of Australia appreciates the opportunity to provide the following comments on the Statement of Requirement, specifications and the projected timeframes for the revision of the Core Food Groups (1994).

The Public Health Association of Australia (PHAA) welcomes the initiative of the NHMRC in revising the Core Food Groups following on the publication of the Nutrient Reference Values for Australia and New Zealand (NRVs) (2006). The PHAA believes that the Core Food Groups are integral to public health nutrition. They form the basis of nutrition education programs and guide food regulation and food policy decisions in a variety of settings. As a leading public health nutrition organisation, PHAA recommends that the following set of principles guide the review of the Core Food Groups so that they continue to provide a scientific and democratic basis to policy and program activities.

1. The revision of the CFGs is informed by scientific evidence and reference standards that are correctly conducted, interpreted and applied.

The PHAA believes that the *Nutrient Reference Values for Australia and New Zealand (NRV)* provide the scientific foundation for the review of the Core Food Groups. It is important that these reference standards are not subject to interpretation that cannot be supported scientifically. Recently, concerns have been raised by public health and nutrition experts that the NRVs are being interpreted and applied inappropriately to legitimise the construction of new food groups. For example, these experts have drawn attention to the inappropriate interpretation of Adequate Intake values for certain nutrients to propose the construction of a so-called ‘healthy fats’ food group and the removal of plant foods from the conventional ‘meat and meat alternatives’ food group [1, 2]. In addition, McNaughton has highlighted that the arguments for constructing these proposed revised food groups is based on selective dietary modelling in which certain foods are inappropriately promoted and/or ignored in determining dietary composition scenarios. These approaches to interpreting scientific reference standards and conducting dietary modelling are non-scientific and must be avoided.

2. The revision of the CFGs and subsequent food selection guides takes into account environmental implication.

There is growing evidence that man's activities are impacting adversely on the climate. It is important that the production of food uses water, oil and soil in an environmentally sustainable way. It follows that the development of the Core Food Groups through to that of food selection guides and nutrition education tools has environmental implications. Establishing Core Food Groups (and subsequent food selection guides) based on the NRVs and dietary guidelines must take into account the protection of the biodiversity of the food supply, its sustainability and the quality of essential resources such as air, water, energy and land. In practical terms, this means that foods that require relatively less resources in their production, processing, distribution and consumption need to be preferentially represented. For example, highly processed and/or fortified foods should not be promoted as the preferred means of achieving the NRVs and dietary guidelines. Generally, the more processed or refined a food is; the more resources are used in its production and processing.

3. The revision of the CRGs must be open and transparent.

The PHAA commends the establishment of a Dietary Guidelines Working Committee to provide advice and guidance during the revision of the CRGs and subsequent suite of revisions for food selection guides. The PHAA considers that in order to maintain confidence in the revised Core Food Groups and food selection guide, stakeholders such as public health nutrition researchers and practitioners must have reasonable opportunities to provide comment on the progress and proposed outcomes of the review. This process includes the opportunity to identify who is involved in the review process, how they are selected and the basis to their decision-making processes, eg dietary modelling activities and interpretation judgements. As previously stated the PHAA endorses the establishment of an advisory panel to engage experts from a broad range of perspectives and specialties, including public health nutrition. Any potential conflicts of interest among individuals and groups associated with the review process must be declared and managed appropriately, e.g. the details of all relationships between individuals associated with the review and food manufacturers must be clearly recorded and available for public scrutiny.

4. The translation of the revised CFGs into food selection guides should deliver a set of guidelines that provide meaningful 'user friendly' advice to consumers on the appropriate types and amounts of food to consume in order to achieve a healthy diet.

The outcomes should not be so scientifically complex that they result in complicated nutrition message that are not consistent with the way consumers perceive and select particular foods and food groups. There is also the risk that overly complex nutrition messages will also disempower consumers making them reliant on 'experts' to interpret for them which foods they should and shouldn't eat or drink.

- 5. Sufficient resources need to be made available from the Commonwealth government to support nutrition education and monitoring and evaluation activities to complement the review of the Core Food Groups and the subsequent review of the food selection guide.**

The PHAA commends the Commonwealth government in undertaking the revision of the NHMRC Dietary Guidelines suite, starting with the publication of the NRVs (2006) and now the revision of the CFGs. We look forward to providing further comment throughout the review process.

Signed



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Public Health Association of Australia

1. McNaughton S. A new Australian food selection guide: Future challenges and opportunities. *Nutrition and Dietetics*, 2007; 75-77.
2. Mackerras D. Presentation, 2007 DAA Annual Conference, Hobart.