PHAA submission on National Food Plan Green Paper 2012

Public Health Association of Australia submission on the National Food Plan Green Paper 2012

28 September 2012

National Food Plan Submissions
PO Box 942
Broadway NSW 2007

Email: nationalfoodplan@coxinall.com.au
PHAA submission on National Food Plan Green Paper 2012

Contents

Introduction ........................................................................................................................................5

Public Health .......................................................................................................................................5
The Public Health Association of Australia .........................................................................................5
Advocacy and capacity building ........................................................................................................5
The National Food Plan .......................................................................................................................5

Public Health Association of Australia National Food Plan Consultation .......................................... 6

Overall aspects ..................................................................................................................................7

Get the priorities right .........................................................................................................................7
Vision and planning ............................................................................................................................8
Structure in planning ..........................................................................................................................9

Consultation issues .............................................................................................................................11

1. A national food plan for Australia .................................................................................................11
Consultation issue ...............................................................................................................................11
PHAA response ................................................................................................................................11
PHAA’s recommendation ....................................................................................................................11
Recommendation 1 ..............................................................................................................................11
Recommendation 2 ..............................................................................................................................11

2. Australia’s food policy framework and food system ..................................................................12
Consultation issues ...............................................................................................................................12
PHAA response ................................................................................................................................12
(a) The proposed outcomes and objectives ......................................................................................12
(b) Providing leadership, coordination and stakeholder engagement on food policy issues in Australia ................................................................................................................................13
Recommendation 3 ............................................................................................................................14

3. A safe and nutritious food supply .................................................................................................15
Consultation issues ...............................................................................................................................15
PHAA response ................................................................................................................................15
Food safety .........................................................................................................................................15
Costs of diet-related health problems ...............................................................................................16
Nutritious foods .................................................................................................................................16
Food exports .....................................................................................................................................16
PHAA submission on National Food Plan Green Paper 2012

Marketing.................................................................................................................. 17
Practical aspects of education................................................................................... 18
Food labelling............................................................................................................. 18
Eco labelling.............................................................................................................. 19
Alcohol......................................................................................................................... 19
Recommendation 4 ...................................................................................................... 20
Recommendation 5 ...................................................................................................... 20
Recommendation 6 ...................................................................................................... 20
Recommendation 7 ...................................................................................................... 20
Recommendation 8 ...................................................................................................... 20
Recommendation 9 ...................................................................................................... 20

4. Australia’s food security .......................................................................................... 21
 Consultation issues ..................................................................................................... 21
 PHAA response ........................................................................................................... 21
 (a) Food security in Australia ..................................................................................... 21
 Costs of healthy and less healthy foods ...................................................................... 23
 Recommendation 10 .................................................................................................. 23
 Recommendation 11 .................................................................................................... 23
 Recommendation 12 .................................................................................................... 23

5. A strong natural resource base ............................................................................... 24
 Consultation issues ..................................................................................................... 24
 PHAA response ........................................................................................................... 24
 (a) The growing global population and food production ............................................. 24
 (b) Initiatives to encourage sustainable farming and fishing practices that balance economic, social and environmental benefits ........................................................................... 25
 (c) Waste management .............................................................................................. 27
 Recommendation 13 .................................................................................................. 28
 Recommendation 14 .................................................................................................. 28
 Recommendation 15 .................................................................................................. 28
 Recommendation 16 .................................................................................................. 28
 Recommendation 17 .................................................................................................. 28
 Recommendation 18 .................................................................................................. 28
 Recommendation 19 .................................................................................................. 29
 Recommendation 20 .................................................................................................. 29
Recommendation 21 .................................................................................................................. 29
Recommendation 22 .................................................................................................................. 29

6. Global food security ................................................................................................................. 30
Consultation issue ..................................................................................................................... 30
PHAA response .......................................................................................................................... 30
Recommendation 23 .................................................................................................................. 31

7. A competitive and productive food industry ........................................................................... 32
Consultation issues ..................................................................................................................... 32
PHAA response .......................................................................................................................... 32
(a) Gaps and general comments on these issues ...................................................................... 32
(b) Export ..................................................................................................................................... 32
(c) New technology ..................................................................................................................... 33
(d) Rural research and development ......................................................................................... 33
(e) Regulatory reform ............................................................................................................... 33
(f) Increased quality including nutritional attributes ............................................................... 33
(g) Improved monitoring of regulation ..................................................................................... 34
Recommendation 24 .................................................................................................................. 34
Recommendation 25 .................................................................................................................. 34
Recommendation 26 .................................................................................................................. 34
Recommendation 27 .................................................................................................................. 34

8. Food trade and market access ................................................................................................. 35
Foods for export .......................................................................................................................... 35
Consultation issues ..................................................................................................................... 35
PHAA response .......................................................................................................................... 35
Recommendation 28 .................................................................................................................. 35
List of Recommendations ........................................................................................................ 36

Conclusion ................................................................................................................................... 39
References ...................................................................................................................................... 40
Introduction

The Public Health Association of Australia Incorporated (PHAA) is recognised as the principal non-government organisation for public health in Australia and works to promote the health and well-being of all Australians. The Association seeks better population health outcomes based on prevention, the social determinants of health and equity principles.

Public Health

Public health includes, but goes beyond the treatment of individuals to encompass health promotion, prevention of disease and disability, recovery and rehabilitation, and disability support. This framework, together with attention to the social, economic and environmental determinants of health, provides particular relevance to, and expertly informs the Association’s role.

The Public Health Association of Australia

PHAA is a national organisation comprising around 1900 individual members and representing over 40 professional groups concerned with the promotion of health at a population level.

Key roles of the organisation include capacity building, advocacy and the development of policy. Core to our work is an evidence base drawn from a wide range of members working in public health practice, research, administration and related fields who volunteer their time to inform policy, support advocacy and assist in capacity building within the sector. PHAA has been a key proponent of a preventive approach for better population health outcomes championing such policies and providing strong support for the Australian Government and for the Preventative Health Taskforce and National Health and Medical Research Council (NHMRC) in their efforts to develop and strengthen research and actions in this area across Australia.

PHAA has Branches in every State and Territory and a wide range of Special Interest Groups. The Branches work with the National Office in providing policy advice, in organising seminars and public events and in mentoring public health professionals. This work is based on the agreed policies of the PHAA. Our Special Interest Groups provide specific expertise, peer review and professionalism in assisting the National Organisation to respond to issues and challenges as well as a close involvement in the development of policies. In addition to these groups the Australian and New Zealand Journal of Public Health (ANZJPH) draws on individuals from within PHAA who provide editorial advice, and review and edit the Journal.

Advocacy and capacity building

In recent years PHAA has further developed its role in advocacy to achieve the best possible health outcomes for the community, both through working with all levels of Government and agencies, and promoting key policies and advocacy goals through the media, public events and other means.

The National Food Plan

The PHAA welcomes the opportunity to contribute further to the development of a National Food Plan by including a series of recommendations in this submission.
Public Health Association of Australia National Food Plan Consultation

The PHAA’s submission to the initial consultation on Australia’s National Food Plan in September 2011 highlighted that the most important achievement of a National Food Plan was to “advance the health and well-being of the population”\(^1\).\(^2\)

The vision from PHAA was for: "a safe, nutritious, affordable, secure and environmentally sustainable food system accessible to all Australians for health, wellbeing and prosperity now and into the future".

PHAA also listed the importance of a range of factors, including those related to environmental sustainability, sufficiency of production, public confidence in the food supply and Australia’s role in contributing to food security at a domestic, national and global level. These and a list of principles and suggestions from PHAA stand.
Overall aspects

Get the priorities right

The priority given to various aspects of the food system should reflect their importance. Food is basically produced for life and health. Future production of food can only occur if we take account of finite resources, and equity issues dictate that sufficient nutritious food should be available to all Australians.

The Green paper includes reference to nutrition and health matters, but more as an ‘add-on’ rather than as the fundamental and underpinning reason for food production. Producing a healthy and accessible food supply, with attention given to issues such as food security and environmentally sustainable food production should underpin all other issues in the National Food Plan. The Green paper implies these fundamental aspects are subservient to economic considerations and a bigger and better, but essentially ‘business-as-usual’, system.

PHAA recommends that the National Food Plan should

- Recognise and emphasise that the primary purpose of food production is to sustain life and health;
- Set goals for producing health-promoting foods from increasingly scarce resources, and minimising waste at all stages of the food chain;
- Ensure the sustainable production of primary food products in the face of a changing climate and increasingly scarce resources;
- Enshrine principles of equity in ensuring food security for all Australians;
- Reduce the growing costly burden of diet-related non-communicable disease;
- Establish Australia as a responsible partner in global food production and equitable distribution.

Once these issues have been covered, the competitiveness of the food industry and related economic issues can be addressed.

PHAA therefore recommends re-ordering the Chapters in the National Food Plan to reflect the importance of issues that Government should oversee in any plan for the future of food in Australia. Further comments on consultation issues are arranged under these proposed section headings.

1. A national food plan for Australia
2. Australia’s food policy framework
3. A safe and nutritious food supply
4. Australia’s food security
5. A strong natural resource base
6. Global food security
7. A competitive and productive food industry
8. Food trade and market access
Recommendation: Chapter 2, *Australia’s food system* should take in material currently included in Chapter 7, *A competitive and productive food industry*, which is essentially a business plan to ensure the food industry remains profitable. Take some sections of the current Chapter 2, *Australia’s Food system* to introduce the new Chapter 2, *Australia’s food policy framework.*

**Vision and planning**

The National Food Plan should present a broad and overarching vision for food policy in the future, setting out strategies for the development of a sustainable food production system and consumption patterns that promote health. Vulnerabilities within the system may relate to the kinds of foods produced and to constraints imposed by increasingly scarce resources and the effects of climate change.

Past models of food production where market forces have set the agenda have led to serious and costly problems for human health and the ecological environment within Australia. It is common to call for education to solve these problems, but while education is essential, higher levels of education in the community have not been successful in encouraging the population to select a healthier diet and appropriate eating patterns. Nor have rising average incomes. The problematic result of the market-driven production of food is shown in increasing levels of obesity with the majority of Australian adults (62%) and a quarter of our children now overweight or obese. This has serious implications for health and also for future health budgets. The need to keep the population healthier so that people can continue to work as they age is also vitally important.

A ‘business-as-usual’ approach, bolstered by ideals to increase productivity, competition and profits will only exacerbate current diet-related health problems among Australians. Exporting foods that encourage unhealthy dietary patterns to others is also a major problem with non-communicable diseases currently responsible for 36 million deaths a year – 63% of the total deaths throughout the world. The United Nations lists the four major risk factors for this disaster as tobacco use, unhealthy diet; harmful use of alcohol and physical inactivity. The National Food Plan is related to two of these risk factors: unhealthy diet and harmful use of alcohol. The Green paper fails to give either adequate attention and does not acknowledge that high quality, safe and healthy food products are good business.

Australia’s food system is also dependent on solving environmental concerns including poor soils and degraded agricultural land, competition for land from housing and mining, scarce water resources, threatened marine environments and more expensive or declining supplies of oil and phosphate fertiliser. The impacts of climate change will also be a major driver of the type and quantities of foods produced, where they are grown and how they are processed and distributed.

Australia’s National Food Plan should present an innovative total overhaul of the food system rather than tinkering at the edges to bring marginal economic improvements to the current system. New vision and new goals to meet specific objectives for the health of the population and the sustainability of our entire food system are imperative.
PHAA submission on National Food Plan Green Paper 2012

To summarise: prime planning for the future requires driving principles to include:

- production of a healthful food supply that minimises waste at all levels;
- production of an adequate food supply in the face of climate change and future limits to production including limits to water, oil and phosphate fertilisers as well as changes in climate;
- food security for all Australians, including those in urban, regional and remote areas with special attention to pregnant women, children, indigenous communities and the elderly;
- prosperity for farmers and those sections of the food industry that deliver healthy foods; and
- an acceptance of Australia’s responsibility towards an adequate and healthy global food supply for all.

Structure in planning

Listing and evaluating current practices is important and PHAA acknowledges the many good programs in place. However, planning for a long-term healthy and sustainable food future requires more emphasis on likely future scenarios and the strategies that will accommodate changes in the food system.

All resources for food production are finite and competition for them will intensify over the coming decades. Market forces seek to maximise profits but not necessarily in a manner that addresses issues such as public health or long term sustainability of resources. Indeed, short-term aspirations relating to immediate returns to shareholders easily obscure the need to conserve scarce resources for future generations. In a highly competitive environment involving basic resources, Government planning and oversight are essential to achieve a system that is sustainable, relevant and fair for all. Through the National Food Plan, the Government can provide leadership with forward-thinking strategies for planning and the use of resources.

The plans by large companies may or may not be for the public good – hence the need for some Government control over direction and the use of diminishing national resources. Appropriate standards for fair and sustainable use of resources will be essential and should be set by Government, without influence from corporate agribusinesses and companies involved in food manufacturing, distribution and retailing. More assistance in planning for the future will be needed by farmers – if we want individual farms to survive.

Forward planning requires foresight, knowledge, strategies for adaptation and appropriate innovation as well as identifying opportunities based on the life cycle impact of producing particular foods. Distribution of food may need change with more emphasis on shorter distribution networks. This will require innovation, strategies and planning.

Governments appear to be reluctant to interfere in the market. With the current degradation and unbridled use of some resources, Government must take a leadership role with policies on coping with the effects of climate change and limited resources. Scarcity of water has received some attention within the Green paper, although the use of water to
produce different crops needs greater attention. Is it wise to export our scarce water resources in the form of wine? Or should we give greater access to water for producing sufficient quantities of essential foods such as fruits and vegetables for domestic consumption? One direction adds to our illness and health care costs; the other acts to reduce them.

Oil and phosphate fertiliser are also becoming scarce and more expensive. The way these resources are sourced and used requires urgent forward and on-going planning to avoid waste and adverse environmental consequences. These issues need more attention than they have been given in the Green paper.

Planning for more effective distribution systems for food and minimising waste are other urgent matters requiring more structural attention. Centralised distribution systems have largely ignored the environmental costs of transporting food over enormous distances. Food waste is an on-going problem that is being addressed but needs much greater overall planning. Food exports also need more planning to ensure Australian food exports don’t exacerbate the rapid growth of diet-related health problems already evident in developing countries.

The National Food Plan has a unique opportunity to provide a broad vision to cope with future needs and contingencies relevant to the 21st Century and beyond. Any food system is vulnerable, but understanding the risks and developing an ability to adapt is an essential part of efficient and effective planning.

Some specific areas that a National Food Plan should address with planning and innovative strategies and options include:

- the types, quantities and quality of foods grown;
- the way foods are grown;
- distribution and marketing of foods;
- soil health;
- the ageing farming workforce;
- competition for scarce resources of land and water;
- the health of land and marine environments and waterways;
- future supplies of oil (‘peak oil’) and availability of alternative fuels;
- decreased supplies and increased costs of fertilisers (‘peak phosphorus’);
- risks of diseases to plants and animals;
- antibiotic use in animals and increasing problems of antibiotic-resistant bacteria;
- increasing problems due to weed tolerance to herbicides;
- loss of biodiversity; and
- competition between using land to grow food for humans, animals or biofuels.
Consultation issues

1. A national food plan for Australia

Consultation issue

Does the possible overall approach outlined in the Green paper create a more strategic, better integrated and transparent approach to food policy?

PHAA response

PHAA agrees that a more strategic, better integrated and transparent approach to food policy is urgently needed. However, the Green paper fails to take an overarching, innovative and visionary approach to correct current problems and plan for a sustainable and healthy future for the food system and for those it feeds.

The plan has some useful information for the operation of the food system, but the relative significance of issues such as health, food security and environmental sustainability that underpin a soundly based food system are lost beneath what is essentially a business plan for the food industry.

The current food system has created major problems for health, sustainability and equity. These should be highlighted, with possible solutions and strategies for implementation.

PHAA’s recommendation

Recommendation 1

Make production of healthy food the primary driver for Australia’s National Food Plan.

Recommendation 2

Ensure the National Food Plan creates opportunities for Australia to be innovative and become a world leader in producing a healthy, sustainable and equitable food supply.
2. Australia’s food policy framework and food system

PHAA maintains that the current food system is in crisis. Chapter 2 Australia’s Food System reads as a ‘business-as-usual’ plan focusing on the economic value of all food production. This does not fit with PHAA’s recommendation that healthy food should be the primary driver and therefore given priority.

Some sections from the current Chapter 2 Australia’s Food System could be retained to introduce this chapter. PHAA recommends including

- the first 2 paragraphs of 2.1 introduction
- the first paragraph of 2.2 What is the food system and Figure 2.1
- add a paragraph on Food and health, noting that the prime purpose of producing food is to sustain health, and follow with
- 2.3.2 Environmental importance of our food system
- 2.3.3 Social importance of our food system

The rest of the material in the current Chapter 2 should move to Chapter 7 A competitive and productive food industry

Chapter 2 would then embrace some of what is currently included in 3 Australia’s food policy framework.

Specific suggested changes to text in Chapter 3 Australia’s food policy framework

- Include a section on Forward planning for a sustainable and healthy food supply.
- 3.3.2 Without a resource base, Australia cannot continue to produce food. This should therefore move from point 4 to the top of the list.
- 3.4 Include the need for future planning and innovation in reducing waste.

Consultation issues

(a) The proposed outcomes and objectives
(b) Governance of leadership, coordination and stakeholder engagement on food policy issues in Australia

PHAA response

(a) The proposed outcomes and objectives

PHAA believes the outcomes and objectives do not give adequate weight to the importance of food for health, food security for all and the sustainability of food production into the future. The outcomes and objectives seem more applicable to continued and increased profits for agribusinesses and the processed food industry.
Production of sustainable healthy food for all should be the prime consideration. More support for farmers, the future of family farms, information and innovation in how foods are grown, distributed and marketed should also be featured.

(b) Providing leadership, coordination and stakeholder engagement on food policy issues in Australia

Suggestions about governance
The National Food Plan necessarily involves many different government departments with an interest and responsibility in collaborating to produce a healthy food system.

PHAA recommends that for greatest efficiency and to prevent dominance by any one sector, the National Food Plan should be under the governance of the Department of Prime Minister and Cabinet. This will help ensure input and responsibility comes from the many sectors affected, including those involved in health; environmental sustainability; water and other resources; agriculture; innovation, research and science; social equity; education; trade; infrastructure; and consumer affairs. PHAA recommends that an Expert Multidisciplinary Advisory Group be set up to advise the Ministerial Standing Cabinet Committee. Input into the Advisory Group should come from Public Health, Community, Agriculture, Environment and Industry members. With this input, Government should then take responsibility for setting policy. This can then be implemented by the food industry and relevant commercial and infrastructure industries.

Figure 1

An alternative, eloquently presented by Dr Jane Dixon\(^9\) would be to establish an independent Food Commission with a role similar to that of the Productivity Commission to oversee the development and on-going evaluation of the National Food Plan.
Recommendation 3

Governance of the National Food Plan should be under the Department of Prime Minister and Cabinet, or an independent Food Commission.
3. A safe and nutritious food supply

Consultation issues

Additional issues the government should focus on in its future policy directions

PHAA response

PHAA believes many health issues related to the food system are not adequately addressed. Since the initial consultation, more reference to health and nutrition has been included, but food and its relationship to health still appears more as an ‘add-on’ rather than an intrinsic part of the food system, and indeed, the basic reason for producing food. PHAA acknowledges that a Food Plan must embrace many aspects of the food system, but the nutritional aspects of foods should come before considerations related to trade and economics. A safe and nutritious food supply is the most vital part of the future planning process for the food system.

The development of a National Nutrition Policy is mentioned briefly with its intention listed as providing “an overarching framework to identify, prioritise, drive and monitor nutrition initiatives”. This sounds more like an operational plan than a policy and there is no attempt to consider how such a policy would inform and be informed by the proposed National Food Plan. A National Food Plan and a National Nutrition Policy must both consider their shared vision for a safe, nutritious food supply for Australia. Failure to do so would significantly impede the capacity of either policy to bring about their desired purposes.

Food safety

The Green paper regards food safety in terms of avoiding short term health problems, for example from infective agents. This aspect of food safety is obviously important, but long-term safety is also imperative. The foods we consume can contribute to or give protection from major diet-related problems including obesity, type 2 diabetes, cardiovascular disease and some cancers. On this basis, the current food supply is not safe since these problems are accelerating. A comparison of the costs of chronic disease and food poisoning is informative and shows where more emphasis is needed. Food poisoning costs in Australia in 2010 were estimated as an unacceptable $1.2 billion. However, costs of chronic disease (obesity, cardiovascular diseases, diabetes and some cancers related to diet) amounted to $67 billion\(^9\).

FSANZ currently plays a vital role in ensuring short-term safety for the food supply. FSANZ needs adequate resources to include long-term safety issues related to food choice.
Costs of diet-related health problems

As well as increased risks of illness and death and the loss of quality of life for individuals, poor diet leads to a massively increased burden for State and Federal governments. The Australian Institute of Health and Welfare reports that poor diet costs Australia $5 billion each year with data from 2007-8 showing that almost every Australian over 15 years of age had at least one risk factor for poorer health – frequently related to diet. The most commonly prescribed medications in Australia in 2010-2011 are those to reduce blood cholesterol, with drugs to lower blood pressure in third place. More attention to dietary patterns would permit drastic reductions in these costly medications.

Australia’s current high rate of obesity also adds massive costs for Government. Estimates in 2008 put the overall cost of obesity to Australian society and Governments at $58.2 billion. These costs include $49.9 billion for the burden of disease (disability, loss of well-being and premature death resulting from obesity and its impacts). A further direct financial cost of $8.3 billion includes $3.6 billion in productivity costs from impacts on short and long-term employment, $2 billion costs to the health system and $1.9 billion in carer costs.

Prevention of disease is cost effective. More than a third of all premature deaths in Australia result from chronic diseases that could have been prevented.

PHAA also believes that dental health costs should be given more emphasis. The Australian Institute of Health and Welfare puts dental costs second only to those of cardiovascular disease. Prevention of dental problems and its relevance to consumption of foods and drinks needs urgent attention.

Nutritious foods

The Australian Government’s Dietary Guidelines recommend that the population consumes a wide variety of nutritious foods. These are described in the five food groups as set out in the Australian Guide to Healthy Eating. PHAA supports these guidelines and recommends that other Government promotions and publications endorse their messages. This includes information on the need to reduce intake of energy-dense and nutrient-poor foods.

Current intake of these ‘extras’ is out of proportion to the small place that would be more appropriate to promote healthy eating patterns. These products, mostly energy-dense and nutrient-poor, and characterised as ‘extras’ in our dietary recommendations now contribute 41% of the total daily energy of 2-18 year olds and over 35% of the energy for adults. Such foods are strongly related to obesity and consequent health problems and their costs.

Food exports

The National Food Plan appears enthusiastic about exporting Australian foods into Asia, mainly for the middle classes. This is essentially a marketing exercise designed to profit the food industry. Some curbs to the enthusiasm are needed, especially with evidence showing
that everywhere the Western diet is adopted, the incidence of obesity, type 2 diabetes, coronary heart disease and certain cancers increases\textsuperscript{16-18}.

This is an area of risk for Australia’s future reputation and the National Food Plan needs to address ways to ensure that the food products exported contribute to a healthy diet rather than duplicating the dietary errors made within Australia. The expansion of marketing infant formula into Asia and developing countries needs special attention\textsuperscript{19}.

**Marketing**

Market forces have increased the range of foods and beverages available in Australia, but the greatest growth has been in products high in saturated fat, added sugars and salt.

We can presume that advertising is effective, or companies would not spend millions of dollars on it. The kinds of foods consumed are strongly influenced by advertising and hence this issue needs to be addressed in the National Food Plan. Adults may have some ability to evaluate advertising, but children are victims of persuasive intent\textsuperscript{20,21}. Ample evidence exists to demonstrate that advertising on television or in-store promotions increases consumption of nutrient-poor, energy-dense foods\textsuperscript{22-27}.

Current industry attempts at self-regulation to curtail advertising during specific times designated as ‘children’s TV time’ have been ineffective, especially as they do not apply to the times when most children are watching television. Indeed, recent research concluded that children’s exposure to unhealthy fast-food advertising has not changed following the introduction of self-regulation\textsuperscript{28}. With evidence that self-regulation has limited use, it is appropriate that Government set a policy framework for regulating advertising to children.

Food companies also target children through games on web sites featuring frequent reference to the company’s product\textsuperscript{29}, through children’s magazines\textsuperscript{30}, on outdoor advertisements close to schools\textsuperscript{31}, via food packaging\textsuperscript{32, 33} and through sport\textsuperscript{34}.

The Government’s Dietary Guidelines promote breastfeeding as the health promoting start for children\textsuperscript{13}. Therefore marketing of infant formula deserves special consideration. The Department of Health and Ageing in Australia currently manages the Advisory Panel on the Marketing in Australia of Infant Formula. Similar control and codes may not exist in countries to which infant formula is exported. The Thai government has been concerned that the unethical marketing and promotion of infant formula and other breastfeeding substitute products in Thailand has undermined breastfeeding\textsuperscript{35}. The United Nations Children’s Fund has also become alarmed at the decline of breastfeeding across East Asia due to the “aggressive marketing of infant formula in the region”\textsuperscript{36}. If infant formula is exported from Australia, the Australian Government needs to be aware of the potential for well-deserved criticism. The National Food Plan needs to include a high order principle that governs the way Australian foods, including infant formula, are marketed in other countries.

Australia has been a world leader in tackling tobacco. Courage in controlling marketing was a key factor in Australia’s success. Some parallels with controlling the marketing of energy...
dense and nutrient poor foods could yield similar success in combating obesity and its expensive consequences.

**Practical aspects of education**

Adoption of more healthful dietary patterns must include strategies to increase the public’s knowledge about food and its relationship to health and sustainability. PHAA supports calls for more education, but recognises that education alone is insufficient in the face of unrestrained marketing and promotions. The National Food Plan needs to give strategic consideration to ways to improve our food choices and those of our children into the future. Among the many influences on food choices, the Government can assist with greater involvement of farmers, retailers, marketers and the education system from pre-schools onwards.

There is good evidence that involvement with home, school or community garden and kitchen programs encourage children and young people to make healthier food choices, based on practical learning about gardening, composting, healthy eating and cooking. The National Food Plan refers to its funding of the Stephanie Alexander School Kitchen Garden program. PHAA supports such programs but would like to see a widespread extension so that all children in primary schools learn food literacy and cooking skills, with extensions into high school and beyond.

**Food labelling**

The National Food Plan recognises that the public wish to know more about their food, what processed foods contain and the origins of ingredients. PHAA is encouraged that the Government is committed to reviewing front of pack labelling and recommends that any interpretive system introduced be evaluated. More information is also required to assist food choice in retail settings and in food service outlets. Better information about country and place of origin would assist the public to make choices that would benefit Australian producers. The ingredient list should also include the percentage of added sugar so that shoppers can make wiser and healthier choices.

The plethora of health claims on food labels also needs to be addressed to reduce the public’s confusion about the worth of particular foods. Any schemes set up for food labelling also require constant vigilance and evaluation as to their effectiveness in changing consumption patterns away from foods that contribute to diet-related health problems.

Alcohol labelling also needs attention. PHAA supports prominent labelling of the kilojoule content of alcoholic drinks and appropriate advice on labels for women who are pregnant or breastfeeding and for children.
Eco labelling

A visionary National Food Plan should also promote and set standards for eco labelling. Based on a life cycle analysis of the carbon costs of particular foods (fresh and processed), eco labelling is an emerging discipline and could help change consumer choice. Government standards are necessary for accuracy and consistency. PHAA believes the Government should encourage life cycle analysis, as it may help change food purchasing patterns. There is also synergism between foods that are good for the body and those that are good for the planet.

Alcohol

The Green paper fails to address alcohol production and marketing – a major health concern, an obvious factor in consumption patterns and a competitor for use of scarce natural resources. The Australian Government includes problematic consumption of alcohol as a high priority for action and the National Preventative Health Taskforce has stated that ‘best practice’ involves universal interventions targeting the whole population, rather than attempting to intervene only with high-risk drinkers. Such important topics that relate to a major part of food production and health care costs are missing from the Green paper.

Governments have imposed some limits on advertising and marketing of alcohol, although the effectiveness of such campaigns is in doubt due to poor regulation. Any policy related to the food system should have mandatory policies on the marketing of alcohol because legislating to restrict alcohol advertising has been shown to be a cost-effective measure to reduce consumption of alcohol and thus the associated health care costs. The National Preventative Health Taskforce notes that the current self regulation by the industry is insufficient – a view shared by 94% of health professionals, but only 3% of the drinks industry and 4% of advertising companies. Also, in support of the need for more robust Government policy on the marketing of alcoholic beverages, recent research (September 2012) reported that 2810 alcohol advertisements were aired over a two-month period in five Australian cities, representing one in 10 beverage advertisements and a placement expenditure of $15.8 million. Around half of all these alcohol advertisements appeared during children’s popular viewing times.

Reducing consumption of alcohol is essential for health, and could substantially reduce health care costs for Governments. PHAA recommends that as well as restricting advertising during programs that are popular with children, Government should also remove tax deductibility for advertising of alcohol and also nutrient-poor, energy-dense food products and drinks. Such a move would be expected to reduce advertising, which in turn would be expected to reduce sales.

Australian agriculture is a primary producer of alcohol. The Green paper fails to address the tension between government actively supporting and promoting agricultural production (of alcohol) and at the same time, using government funds in an attempt to remedy the consequences of high consumption of alcohol.
Recommendation 4

A National Food Plan should define food safety to encompass long and short-term health considerations and resource FSANZ adequately to include all aspects of food safety.

Recommendation 5

A National Food Plan should aim to change food consumption patterns to reduce the incidence and costs of all diet-related health problems, including dental health.

Recommendation 6

The National Food Plan should also align with the goals of a National Nutrition Policy with both sharing a vision for a safe, nutritious food supply for Australia.

Recommendation 7

A National Food Plan should ensure food exports from Australia do not contribute to diet-related health problems in developing countries.

Recommendation 8

A National Food Plan should remove tax deductibility for advertising of alcohol and also nutrient-poor, energy-dense food products and drinks.

Recommendation 9

A National Food Plan should promote and set standards for life cycle analyses for foods and beverages.
4. Australia’s food security

Consultation issues

(a) 4.1 Is Australia food secure?
(b) 4.3 Analysis of the factors that contribute to food security and specific suggestions.

PHAA response

(a) Food security in Australia

PHAA notes that a significant number of Australians are not food secure.

FAO defines food security as existing “when all people, at all times, have physical and economic access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life”\(^5\)\(^\circ\). The Universal Declaration of Human Rights states that “everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food”\(^5\)\(^1\). Others define the right to adequate food not as a right to be fed but as “a right of people to be given a fair opportunity to feed themselves”, now and in the future\(^5\)\(^2\).

The World Health Organization has declared that “food security is built on three pillars:

- Food access - having sufficient resources to obtain appropriate foods for a nutritious diet (ie, transport and financial resources);
- Food availability - sufficient quantities of nutritious food available on a consistent basis;
- Food use – having appropriate use based on knowledge of basic nutrition and care, as well as adequate water and sanitation\(^5\)\(^3\).

PHAA recommends that a useful summary for food security involves food that is:

- available (safe, nutritious, in sufficient amounts and reliable supply);
- accessible (distribution systems enable it to get to where it is needed);
- and affordable (available at prices people can afford to pay, taking account of the need for adequate incomes and freedom from poverty).

Food insecurity refers to: not having enough food; experiencing hunger as a result of running out of food and being unable to afford more; eating a poor quality diet as a result of limited food options; anxiety about acquiring food; or having to rely on food relief\(^5\)\(^4\).

The Green paper downplays the extent of food insecurity within Australia with statements such as ‘most Australians can afford to buy food’. While technically correct, using the term ‘most people’ obscures the vulnerability experienced by a large number of Australians. The National Health Survey of 2004-2005 noted that 5% of the general population, but 24% of indigenous people run out of food at times. The significance of this would be more apparent by using the figure of over 1 million people, rather than (the ‘lesser sounding’) 5% of the
population. More recent data should also be recorded. FoodBank, Australia's largest hunger relief organisation, reports significant increases in the number of Australians seeking help with food supplies over the last few years. FoodBank also notes that low income families now make up 80% of their clients and estimates that 2 million Australians do not have enough food to eat on occasions and 1 million children go to school without breakfast, or to bed without dinner.

Other data available for Australia have been described by Professor Sharon Friel of the Australian National University. Reports show that 15% of young people, 20% of people in the second lowest income quintile and rental households, 23% of unemployed and single parent households, 71% of refugees resident in Australia for less than a year, and 7% of the general population surveyed in South Australia report having run out of food at times during the previous 12 months and not being able to buy more. In New South Wales, 5.3% of people aged 16 years and over experienced food insecurity in 2005. The prevalence is much higher among socially disadvantaged households and 22% of low income households in South West Sydney reported having run out of food at times during the previous 12 months and not being able to buy more.

PHAA recognises that food insecurity is a multi-faceted problem, but recommends that the National Food Plan give it greater acknowledgement and attention. Figures relating to ‘the majority of Australians’ and to ‘average’ percentage of income spent on food hide the extremes of vulnerable individuals and families. Data from Western Australia show that a welfare-dependent couple family would need to spend 43% of their household income on food compared to 16% for the average-income family and a one parent welfare-dependent family would need to spend 48% compared to 30% for the average one-parent family. As noted in the Green paper, indigenous people also suffer greater food insecurity than other groups.

Lack of food security also has ramifications for health care costs that must be met by Government. Due to higher costs of many healthy food items, low-income households are more likely to purchase unhealthy processed foods that are energy-dense and nutrient-poor and linked to obesity, cardiovascular disease and type 2 diabetes.

In analysing individual and community food security, the Green paper notes that the Australian Government sees value in various strategies suggested by stakeholders, but fails to take responsibility and places the onus on state and local governments. Australia is one of the wealthiest countries in the world and PHAA believes the whole population should enjoy food security.

Government needs to take the primary steering role to facilitate and coordinate policies to help solve problems of food insecurity. This will require a whole of government approach and the involvement of relevant agencies and partners. Government should also seek to correct the conditions that make it difficult for many people to access healthy food choices. PHAA recommends that Governments systematically list these adverse conditions, including those relevant for the elderly and draw up plans for changing the conditions, attaching responsibility for each suggested action.
**Costs of healthy and less healthy foods**

In solving problems related to insufficient food, the availability and affordability of nutritious foods needs attention. With the exception of buying food in remote locations, an overall healthy diet is not necessarily more expensive. However, foods that are high in energy and low in nutrients are often more convenient, more readily available and represent a cheap source of kilojoules. Using cheaper healthy products requires skills and resources, including time.

PHAA recommends that Government aim to make healthy foods more affordable and accessible to all. The Australian government is prepared to subsidise diesel fuel in rural areas and PHAA recommends subsidising nutritious foods for people in remote areas. This may involve assistance to farmers who sell products such as fruit and vegetables or appropriate subsidy schemes for those on low incomes. Subsidies on healthier foods will be most effective if accompanied by curbs on marketing tactics by those selling energy-dense and nutrient-poor foods.

PHAA recommends the Government also address the principles assessed in a joint policy from the Dietitians Association of Australia and PHAA and provide succinct data about the current situation in relation to food security for Aboriginal and Torres Strait Islander peoples in Australia. The principles addressed in this paper should be added to the issues covered in the National Food Plan.

Among indigenous communities, school or community gardens can also be a valuable source of nutritious foods and improve food security.

**Recommendation 10**

The National Food Plan needs to give greater acknowledgement and attention to the actual level and total numbers of Australians affected by food insecurity.

**Recommendation 11**

The Australian Government should ensure healthy foods are more affordable and accessible to all by subsidising the cost of nutritious foods for people in rural and remote areas.

**Recommendation 12**

The Government should take a primary steering role to facilitate and coordinate policies to help solve problems of food insecurity.
5. A strong natural resource base

This section of the Green paper contains useful information and addresses many of the issues relevant for sustainable production of food. However, its placement so far into the document makes little sense when sustainable use of resources is a basic aspect of the food system. Without more attention to this area, Australia cannot expect a competitive and productive food system into the future. As shown by past experience, market forces are insufficient to ensure a sustainable resource base. Government needs to place the issue high on the national agenda with appropriate standards.

The effects of climate change and increasing scarcity of resources means that ‘business as usual’ is no longer an option. ‘Peak’ oil and ‘peak’ phosphorus, as well as increasing competition for land and scarce water resources are basic issues. PHAA recommends this section be moved forward in the National Food Plan from 7 to section 5.

Consultation issues

(a) Pressure to increase food production for a growing global population

(b) Initiatives that Government could consider to encourage sustainable farming and fishing practices that balance economic, social and environmental benefits.

(c) Waste management

PHAA response

(a) The growing global population and food production

The world’s population is close to 7 billion and is expected to reach 9 billion before stabilising. Currently around a billion people currently do not have sufficient food, although more than enough food to feed the current (and future) global population is produced. The problems lie with

- lack of money to buy food
- the types of food produced
- use of agricultural land for housing
- use of agricultural land to grow crops to feed animals rather than growing crops for human consumption
- wastage at all stages of the food chain
- use of agricultural land to grow biofuels for cars and machinery
- removal of phosphate rock from poorer countries (such as Western Sahara) to produce fertilisers for wealthy countries such as Australia
- competitive use of agricultural land and resources to produce grapes for alcohol rather than fruit for human consumption
- use of resources to produce excessive quantities of food for overfed populations
- dumping of crops to maintain prices
PHAA submission on National Food Plan Green Paper 2012

Each of these problems needs to be addressed. Using claims that an increasing global population justifies expanding food production in Australia is disingenuous when the National Food Plan makes it clear that the aim is to produce more high cost food for middle class Asians. This will not provide for the billion or so people who have no or limited food security.

PHAA recommends that the Australian government supports food programs related to the increasing world population through technical and agricultural aid programs, as well as emergency assistance. Exporting foods to Asia, as described in the green paper, is a marketing strategy that does not address global food security. PHAA is not objecting to marketing efforts, although the types of foods exported require careful attention to avoid exporting the diet-related health problems associated with a western dietary pattern. However, PHAA recommends that the Australian government does not give the false impression that Australia is increasing its food production to assist the expanding world population on the basis of the Green paper. Those who could use extra food will not be able to pay for it.

(b) Initiatives to encourage sustainable farming and fishing practices that balance economic, social and environmental benefits.

PHAA believes that ecologically sustainable farming and fishing practices are the essential basis for food production. Once sustainable systems for producing nutritious foods are identified and in place, economic and business interests should then be required to adapt to fulfil these needs, always fitting in with ecological sustainability. Government’s role will include emphasising the social benefits of a healthy and sustainable food system to farmers and the public. Economic considerations should be secondary to issues of health and sustainability. Without ecologically sound systems, food production will ultimately falter.

The Government accepts that agriculture and fisheries will be affected by climate change and dealing with the effects must take a primary role in the food system. Many farmers are recognising the importance of climate change and are implementing more sustainable practices to deal with effects on land, water, soil and other resources. Others are ignorant or resistant to change. The National Food Plan needs to challenge citizens who are sceptical about climate change and also food industries and farmers who are not prepared to forego short-term profits to adopt more sustainable practices. Government can assist by collecting and collating data and information, funding and supporting agricultural research and developing strategic plans for sustainable options for farming and fishing. Soundly based education is also required so that the public understands the need for some changes within the food system.

The carbon reduction program initially granted an exemption to agriculture, but this cannot continue indefinitely, since agriculture is responsible for almost 16% of Australia’s greenhouse gas production, with two thirds of that coming from methane produced by cattle and sheep. Although scientists are working on reductions in methane from ruminant animals, significant methane levels will continue for ruminant animals. Farmers need
encouragement to switch to animal foods with a lower carbon footprint. Government campaigns can assist with research, public education and retail involvement.

Greenhouse gases associated with food involve more than agricultural production. The whole food system involving agriculture as well as transport, manufacturing, packaging, storage, refrigeration and the disposal of waste food and packaging is responsible for almost a quarter of Australia’s greenhouse gases\textsuperscript{73}.

Greenhouse gas production can be reduced by following the suggestion in the draft Australian Dietary Guidelines to eat to meet (rather than exceed) daily energy needs. Reducing waste could simultaneously benefit health and reduce use of resources and greenhouse gas emissions\textsuperscript{13}.

Eco-labelling systems that establish the carbon footprint of particular foods are being developed. These depend on a life cycle analysis for various foods, and vary depending on the conditions under which foods are produced. Accepted methodology is available and can form the basis for comparisons between different foods\textsuperscript{74,75}.

Use of resources varies for particular foods and needs consideration. For example, it does not make sense to use scarce resources to produce alcoholic beverages. With meat production, greenhouse gas emissions vary for different kinds of meat animals and methods of animal production. Animals that do not produce methane, for example rabbit, kangaroo and various kinds of poultry may require special promotion. More data on production of protein from plant sources is also needed, with evidence accumulating that plant protein creates a lower carbon footprint than production of animal protein\textsuperscript{76}. Such information needs to be collected and studied for food for export as well as domestic consumption.

Many farmers, including the members of the Australian Food Sovereignty Alliance, are actively working towards a food system that is equitable, sustainable and resilient. Other groups, rail against integrating environmental sustainability with other guidelines. For example, the National Farmers Federation does not think sustainability should influence decisions about food choice\textsuperscript{77}. PHAA recommends that Government offers impartial leadership in bringing various stakeholders together to encourage an ecologically sustainable food system. This may involve helping farmers implement projects such as “climate smart agriculture”, which the Secretary-General of the United Nations General Assembly noted can best be achieved by methods such as enhancing organic soil nutrients, agro-forestry in appropriate locations, choice of crops, improved management of farm animals and water, greater use of integrated pest management and sustainable diets\textsuperscript{78}.

PHAA recommends more attention be given to the synergism between the foods that make up a healthy diet and those produced sustainably. Government should foster this interrelationship which can be used as a motivating factor to improve the diet of Australians. Scientists at major Australian Universities (including Australian National University, the University of Adelaide, the University of Technology Sydney, Sydney University and others, as well as CSIRO are undertaking major research in these areas. PHAA recommends that Government supports these well-regarded researchers and develops integrated strategies for a healthy sustainable food supply.
Other issues requiring more attention than is given in the Green paper include land clearing and subsequent erosion and nutrient losses from soil.\(^79\)

**Leadership**

PHAA believes that more Government initiatives, strategies, benchmarks and evaluation programs will be essential as the effects of climate change accelerate.

In Ireland, the Irish Food Board has recently introduced an *Origin Green* program, based on a sustainability charter and involving targets and goals for food products that are used domestically or exported\(^80\). Participants in the program commit to a charter that directs them to reduce their impact on the environment by reducing their energy inputs and minimising their carbon footprint. As part of this program, the Irish Food Board measures the carbon-footprint of food producers and assists farmers and fishers and food companies to reduce their greenhouse gas emissions.

PHAA recommends that the Australian Government sets in place a scheme with similar goals to the Irish Food Board. Communication about the goals and improvements in reducing greenhouse gases will be vital. For individual food producers, an independently validated seal of approval for sustainability can bring economic and social benefits.

**Exports**

There is a disconnect between the acceptance in the Green paper that climate change is likely to reduce agricultural productivity and the constant mention of increased export of Australian foods. Resources of water, oil, good agricultural land and phosphate fertilisers will become scarce and more expensive. PHAA recommends that these issues warrant more attention, especially the problem of ‘peak phosphorus’ which receives little attention in the Green paper.

**(c) Waste management**

PHAA is pleased to see this issue receiving attention with data about food waste included in the Green paper. Wastage of food across the food system is of major importance throughout the world with approximately one third of all food produced for human consumption wasted\(^81\). Food waste in Australia occurs throughout the food chain and especially at the retail and domestic stages.

Part of the problem in prosperous countries such as Australia lies with ignorance of the ecological costs of wasting food, a lack of education about food preparation, little planning within households and an attitude that promotes buying more. Some of these factors are encouraged by retail marketing which overstocks fresh foods to provide a picture of abundance and choice. Many Australians also fail to understand ‘use-by’ and ‘best before’ information on food labels. Waste disposal systems in most areas of Australia also fail to provide solutions for separating and composting food waste.
Some waste is due to a disconnect between those who produce food and those who buy it. Some shoppers at farmers markets have reported that they waste less food because they feel it would be an insult to the person who grew it. The National Food Plan needs to devise and publicise strategies to reduce waste at all levels.

**Recommendation 13**

The Australian government should provide technical and agricultural aid programs to assist countries become food secure.

**Recommendation 14**

The National Food Plan should include information on the carbon footprint of different foods and beverages, establishing and overseeing an eco-labelling system with appropriate methodology.

**Recommendation 15**

The National Food Plan should establish and promote ways to change the Australian diet to achieve synergism between improving the national dietary pattern and reducing greenhouse gas emissions.

**Recommendation 16**

That Government publicises the extent and costs of household food waste to increase the public’s awareness of its ecologic costs and effect on the household budget, developing comparisons between the costs of wasted food and other costs of essentials such as water and electricity.

**Recommendation 17**

That Government estimates and releases data on greenhouse gas emissions due to food waste.

**Recommendation 18**

That Government involve local government, food service establishments and retailers to introduce recycling of food waste through composting, promoting proven schemes such as those developed by Zero Waste in which all materials are designed to be re-usable.
Recommendation 19
That Government review regulations that may inadvertently contribute to food waste (such as use by dates on food packaging).

Recommendation 20
That Government establish cooking and food preparation as subjects in primary schools.

Recommendation 21
That Government fund cooking and food preparation programs for disadvantaged groups.

Recommendation 22
That the national Food Plan promotes shorter food distribution cycles with greater contact between producers and the public.
6. Global food security

Consultation issue

Australia’s contribution to global food security.

PHAA response

PHAA supports the Green paper’s emphasis on Australia providing technical support, education and agricultural training for workers to enhance food production in developing countries.

Australia can also offer expanded aid programs that involve training and provision of appropriate technologies to assist developing countries.

Phosphate rock
Australian soils are deficient in phosphorus which has been supplied by superphosphate fertiliser, made from phosphate rock. Much of this phosphate rock is sourced from Western Sahara, which is occupied by Morocco. There is concern that exports of this valuable resource mean that African countries cannot access phosphorus which would benefit their own agriculture. The National Food Plan is silent on the issue of phosphate rock, but should address the issue, both as a global concern and also because of Australia’s direct involvement in imports of phosphate rock.

Biofuels
Using resources in developed or developing countries for production of biofuels should be addressed in this chapter as it impacts significantly on global food systems. Using resources to produce biofuels creates competition with food production and leads to rising prices for grains. This creates major problems for the poor throughout the world and also increases the pressure on natural resources. PHAA is aware that the Government has concerns about biofuels having adverse effects on global food security and sustainability and is interested in the development of biofuels from non-food and non-traditional components such as algae, oilseeds and wood waste. The issue of using agricultural land for biofuels requires greater attention in the National Food Plan.

Animal production
The Green paper recognises that increasing quantities of animal protein will create further challenges for global food security, but ignores the potential problems by proposing to increase exports of meat to Asia. PHAA recommends that the National Food Plan looks more closely at proposals to increase export of animal products to Asia and takes steps to limit quantities and ensure high quality lean products. The threat to health has been mentioned earlier in this submission, but also includes an imbalance in the diet if people buy meat at the expense of their traditional diets that have a high content of plant-based foods.
Foods for export
The Green paper notes that wines and other beverage and confectionery were among the top 23 lines that accounted for 76% of the total value of food exports.

Many of the food products exported from Australia are likely to threaten the health of the importing countries. For example, Australia supplies approximately 38% of the total food and beverage market in Fiji, with the key products being frozen meat, frozen seafood, confectionery, cereal, spices, dairy products, wine, beer and other beverages, fresh produce, canned fruits, sauces and spreads, ‘health’ bars and snack products. Much of this is not beneficial to health and is likely to be contributing to the increasing prevalence of non-communicable disease in that country.

Production of these products also uses scarce resources. Although more recent figures are unavailable since the cessation of Land and Water Australia, a 2007 report found that water used for wine grapes amounted to 536,749 megalitres.

Recommendation 23
The National Food Plan should address the problem of the types of foods exported to other countries and the resources consumed through such production.
7. A competitive and productive food industry

PHAA is concerned that this is the largest section of the National Food Plan. We recognise that Australia needs a productive food industry but consider that competition is an area where individual companies can play a major role.

Consultation issues

(a) gaps in the proposals
(b) value added foods for export
(c) new technology
(d) increasing rural research and development
(e) regulatory reform
(f) increased quality including nutritional attributes
(g) improved regulation
(h) issues related to competitiveness
(i) food industry trends and market changes, including growth opportunities in Asia

PHAA response

(a) Gaps and general comments on these issues

Many of these issues are relevant to companies’ business plans. Government also has an interest in a thriving food industry within Australia and in ensuring that correct business practices occur. However, PHAA reiterates that in all aspects of business, the future need is to keep in mind that the primary purpose of a National Food Plan is to produce healthy foods in an ecologically sustainable way and accessible to all.

(b) Export

As discussed earlier, the proposal to increase exports of meat, dairy products, sugar, wheat and processed foods to Asia and convert the population to a more western dietary pattern will have repercussions for the health of the populations who purchase these products. Many countries in Asia and other areas do not have health systems that can cope with the diet-related diseases that result from a western-style diet.

‘Value adding’ for export can have many applications, and may be valuable. However, if ‘value-adding’ means adding sugar, fat, starches and other fillers – as it often does within Australia – the term is used incorrectly from a health perspective and is incompatible with a production of a healthy food system.
(c) New technology

PHAA recommends that issues involving new technology such as genetic modification, irradiation and nano technology be subjected to stringent testing and adequate labelling to enable the public to include or exclude particular products from their diet.

(d) Rural research and development

PHAA supports an expansion in this area, particularly to benefit farmers. PHAA also recommends the Government address the ageing farming workforce, increase the attractiveness of farming as a career and ensure adequate educational facilities are available.

(e) Regulatory reform

Many large companies and agribusinesses call for minimal Government regulation. Regulations are set up for specific purposes to benefit society and have increased the safety of the food system. Calls for self regulation by companies or bodies such as the Australian Food and Grocery Council may be ineffective. This is shown in the way food companies in Australia disregard a code of practice for nutrient claims on food labels. Self regulation of food advertising to children has also been ineffective. Greater regulation would be valuable to the general public in issues such as advertising and marketing of foods to children, control of health claims on foods and related promotional material, meaningful front-of-pack labelling on foods, use of industrially produced trans fat and control of alcohol advertising. In each of these examples, food companies have resisted regulation. Appropriate regulations related to microbiological food safety are also vital. A small number of companies and food premises disregard these regulations, but they form the basis of a microbiologically safe food system within Australia.

(f) Increased quality including nutritional attributes

PHAA supports products that are more nutritious. The main way to achieve this is through reformulating processed foods so they contain less saturated and trans fat, less salt and less added sugar. Government support for research should be directed to product reformulation that is consistent with the Australian Dietary Guidelines.

Increased nutritional quality is admirable if it relates to preserving nutrients in foods. Foods with novel ingredients added – so-called ‘functional foods’ may or may not be valuable. For example, there is little to be gained if ‘functional’ ingredients are added to products with other undesirable nutritional characteristics or if the products are expensive and likely to displace purchase of nutritious foods such as fruits and vegetables. Innovation is valuable if, as emphasised throughout this submission, it benefits health, contributes to food security (by being accessible to all) or addresses issues of ecologically sustainable production.
PHAA submission on National Food Plan Green Paper 2012

(g) Improved monitoring of regulation

PHAA supports improvements in regulation that would result in greater public confidence in all aspects of the food system. The present situation where it is up to non-government agencies, especially consumer and public health organisations, to note and report inaccuracies in food labelling and breaches of various codes or regulations on an ad hoc basis is unsatisfactory. Government needs to appoint people with a nutrition or public health background to act as ‘watchdogs’ in checking the accuracy of claims made on food labels, in advertisements, on websites and other promotional material about foods.

Recommendation 24

The National Food Plan should always keep the production and export of healthy and sustainably produced foods as its prime goal.

Recommendation 25

The National Food Plan should ensure all new ingredients and technologies are thoroughly tested and evaluated. This will require adequate labelling.

Recommendation 26

The National Food Plan should give increased attention to rural research and development and appropriate education to assist farmers.

Recommendation 27

The National Food Plan should ensure adequate regulation to assist the public to be able to select healthy foods. Greater attention to what is occurring in marketing is also essential.
8. Food trade and market access

Foods for export

Consultation issues

Is it in Australia’s interest to promote global food security?

PHAA response

PHAA supports the Government being involved in contributions via technology and expertise transfers to developing countries as well as providing advocacy and support for appropriate policies at the global, regional and national level. We also support short term emergency food assistance.

In all cases, the Government must avoid exploitation of others, especially developing countries. This extends to issues including Australia’s use of resources such as phosphate rock that is then unavailable to African countries who need it but currently cannot afford to pay the prices demanded.

PHAA recommends that the Government takes note of the United Nations General Assembly’s 2011 plea in relation to preventing and controlling non-communicable diseases. The UN urged companies to “consider producing and promoting more food products consistent with a healthy diet”\(^{89}\). Australia needs to take this exhortation seriously, and as discussed earlier in this submission, aim to avoid exporting the western diet and its associated health problems to other countries.

PHAA also urges the Government to support world efforts to acknowledge and act to contain the effects of climate change.

Recommendation 28

The National Food Plan should provide assistance to developing countries, in keeping with the United Nations General Assembly’s plea to produce and promote foods consistent with a healthy diet.
List of Recommendations

**Recommendation 1**
Make production of healthy food the primary driver for Australia’s National Food Plan.

**Recommendation 2**
Ensure the National Food Plan creates opportunities for Australia to be innovative and become a world leader in producing a healthy, sustainable and equitable food supply.

**Recommendation 3**
Governance of the National Food Plan should be under the Department of Prime Minister and Cabinet, or an independent Food Commission.

**Recommendation 4**
A National Food Plan should define food safety to encompass long and short-term health considerations and resource FSANZ adequately to include all aspects of food safety.

**Recommendation 5**
A National Food Plan should aim to change food consumption patterns to reduce the incidence and costs of all diet-related health problems, including dental health.

**Recommendation 6**
The National Food Plan should also align with the goals of a National Nutrition Policy with both sharing a vision for a safe, nutritious food supply for Australia.

**Recommendation 7**
A National Food Plan should ensure food exports from Australia do not contribute to diet-related health problems in developing countries.

**Recommendation 8**
A National Food Plan should remove tax deductibility for advertising of alcohol and also nutrient-poor, energy-dense food products and drinks.

**Recommendation 9**
A National Food Plan should promote and set standards for life cycle analyses for foods and beverages.
Recommendation 10

The National Food Plan needs to give greater acknowledgement and attention to the actual level and total numbers of Australians affected by food insecurity.

Recommendation 11

The Australian Government should ensure healthy foods are more affordable and accessible to all by subsidising the cost of nutritious foods for people in rural and remote areas.

Recommendation 12

The Government should take a primary steering role to facilitate and coordinate policies to help solve problems of food insecurity.

Recommendation 13

The Australian government should provide technical and agricultural aid programs to assist countries become food secure.

Recommendation 14

The National Food Plan should include information on the carbon footprint of different foods and beverages, establishing and overseeing an eco-labelling system with appropriate methodology.

Recommendation 15

The National Food Plan should establish and promote ways to change the Australian diet to achieve synergism between improving the national dietary pattern and reducing greenhouse gas emissions.

Recommendation 16

That Government publicises the extent and costs of household food waste to increase the public’s awareness of its ecologic costs and effect on the household budget, developing comparisons between the costs of wasted food and other costs of essentials such as water and electricity.

Recommendation 17

That Government estimates and releases data on greenhouse gas emissions due to food waste.

Recommendation 18

That Government involve local government, food service establishments and retailers to introduce recycling of food waste through composting, promoting proven schemes such as those developed by Zero Waste in which all materials are designed to be re-usable.
PHAA submission on National Food Plan Green Paper 2012

Recommendation 19
That Government review regulations that may inadvertently contribute to food waste (such as use by dates on food packaging).

Recommendation 20
That Government establish cooking and food preparation as subjects in primary schools.

Recommendation 21
That Government fund cooking and food preparation programs for disadvantaged groups.

Recommendation 22
That the national Food Plan promotes shorter food distribution cycles with greater contact between producers and the public.

Recommendation 23
The National Food Plan should address the problem of the types of foods exported to other countries and the resources consumed through such production.

Recommendation 24
The National Food Plan should always keep the production and export of healthy and sustainably produced foods as its prime goal.

Recommendation 25
The National Food Plan should ensure all new ingredients and technologies are thoroughly tested and evaluated. This will require adequate labelling.

Recommendation 26
The National Food Plan should give increased attention to rural research and development and appropriate education to assist farmers.

Recommendation 27
The National Food Plan should ensure adequate regulation to assist the public to be able to select healthy foods. Greater attention to what is occurring in marketing is also essential.

Recommendation 28
The National Food Plan should provide assistance to developing countries, in keeping with the United Nations General Assembly’s plea to produce and promote foods consistent with a healthy diet.
Conclusion

PHAA welcomes the opportunity to contribute further to the development of a National Food Plan through the provision of the recommendations contained in this submission.

Please do not hesitate to contact PHAA should you require additional information or have any queries in relation to the submission.

[Signature]

Melanie Walker
Acting Chief Executive Officer
Public Health Association of Australia

28 September 2012
References


30. Kelly B, Chapman K. Food references and marketing to children in Australian magazines: a content analysis. Health Promot Int, 2007. 22(4): 284-91. Australia was the first country to include promotion and support of breastfeeding in its Dietary Guidelines. Within Australia, strict codes relate to infant formula and its marketing.
47. Collins DJ, Lapsley HM. The avoidable costs of alcohol abuse in Australia and the potential benefits of effective policies to reduce the social costs of alcohol. Australia. Canberra; 2008
55. End Hunger, FoodBank, August 2012.
56. Friel S. Climate change, food insecurity and chronic diseases: sustainable and healthy policy opportunities for Australia. NSW Public Health Bulletin 2010; 21(5–6): 129-133.
60. NSW Department of Health. New South Wales Population Health Survey 2005: Food insecurity in the last 12 months by socioeconomic disadvantage, persons aged 16 years and over. Sydney: Centre for Epidemiology and Research, NSW, Department of Health; 2005.
62. Landrigan T, Pollard C. Food Access and Cost Survey (FACS), Western Australia, 2010, 2011, Department of Health in Western Australia: Perth.
70. PMSEIC (2010) Australia and food security in a changing world. The Prime Minister’s Science, Engineering and Innovation Council, Canberra.
82. O’Kane G. 2nd National Sustainable Food Summit, Three Pillars Network, Sydney April 2012.
83. http://zerowasteaustralia.org/