

Response ID ANON-ZKFT-DDBK-M

Submitted to **Aspirations for the food regulatory system**

Submitted on **2021-01-21 13:19:51**

About you

What is your name?

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Please tick this box if you would like your response to be confidential

What sector do you represent? (Required)

Public Health Organisation

If 'other' sector selected, please specify in the text box:

What is your organisation?

Organisation name:

Regional Public Health

Which country are you responding from? (Required)

New Zealand

If you selected 'other' please specify country:

The field below provides an opportunity to submit any other information about your organisation.

An opportunity to provide any other information about your organisation.:

Regional Public Health (RPH) is the public health unit serving the greater Wellington region, through the three district health boards (DHBs): Capital & Coast, Hutt Valley and Wairarapa. It is a key agency providing expertise in public health nutrition advice for the greater Wellington region with a team of dietitians focusing on nutrition and physical activity. We promote good health, prevent disease, and improve the quality of life for our population. Our staff includes a range of occupations such as medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts. RPH is government funded to work with groups and communities within our region who have the greatest burden of disease, these include Māori, Pacific, low socio-economic, migrant and refuge communities. An important area of work is working together with communities and health services to influence the many wider causes of good health or ill health in our population. Therefore RPH does not specifically work with the regulatory and in-depth nutrition information provided by Food Standards Australia and New Zealand (FSANZ), however is involved on the broader effects of the work that FSANZ is involved in.

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Challenges and opportunities facing the broader food ecosystem

1 What other key challenges and opportunities are facing the food system?

What other key challenges and opportunities are facing the food system?:

RPH is in full support of FSANZ broadening the range of challenges and opportunities facing the food system. The key challenges and opportunities presented in the report are extensive and cover a broad range of activities within the food system. Food safety and regulation aspirations and decisions have a significant impact on health and wellbeing and can either positively impact or exacerbate inequities. RPH acknowledges that there is an equity component within each of the key challenges and opportunities provided in the aspirations report, however recommends that equity is explicitly made a key challenge to ensure that it is prioritised within our food system.

The COVID-19 pandemic has further highlighted the need for greater access to food, especially for healthy and affordable foods for those who are most vulnerable (Rachel Carey, 2020). Those living in lower-socioeconomic neighbourhoods are more likely to live in 'food deserts' where accessibility to healthy foods is reduced (Zaynel Sushil, 2017). This emphasises the importance of having greater regulation on food content, marketing and clearer labelling to allow for those who live in these neighbourhoods to have the knowledge and opportunity to make a healthy choice. Providing foods with poor nutritional value to these neighbourhoods further exacerbates food insecurity and reduces equity in vulnerable populations. Within Australia and New Zealand, poor nutrition and obesity rates are highest in indigenous and low-socioeconomic populations (Welfare, 2020) (Zealand, 2020). Obesity is a complex issue with a broad range of solutions and it is important that everyone who is involved in the food system prioritises strategies that lead to a reduction in obesity. FSANZ plays an important role in the regulation of food and nutrient additives such as salt, sugar and saturated fat to reduce obesity (Sally Mackay, 2019).

RPH is encouraged to see that FSANZ is seeking to continuously improve the food regulatory system to meet the increasing challenges and opportunities within the food system. The food system is a dynamic system that will continue to see future challenges and opportunities arise. As noted in the report, the framework is over 20 years old. It is therefore important that the revised framework is nimble to ensure that it is able to adequately respond to new challenges and opportunities that arise in the future.

Objectives and scope of the food regulatory system

2 Do you agree that the focus of reforms should be on ensuring the system is set up to support interface management across regulatory systems, enables collaborative risk assessment and triage of issues and provides a range of (regulatory and non regulatory) tools to support the system's objectives and empower consumers and industry?

Yes

If you answered 'no', please explain why not. :

Yes, RPH agrees with the focus on reforms. To further support the system's objectives and empower consumers and industry, RPH suggests that what is missing from this is the overall impact that the food supply chain has on human health, especially in relation to non-communicable diseases, long-term chronic conditions and nutrition-related illnesses. FSANZ's previous regulatory approach has largely focused on the prevention of food-borne illnesses, poisoning or allergic responses to food. RPH believes that this is a key time for FSANZ to expand the reforms to ensure that the food supply is set up to support the health of all consumers.

Aspirations for the food regulatory system

3 Is there anything missing from these aspirations and high level actions?

Not Answered

If you answered 'yes', what is missing from these aspirations and high level actions? :

RPH recommends considering the impact of the overall food supply and how it is regulated in relation to impacts on the health of our population as a whole. The food supply is extensive, as are the solutions to reducing obesity. The INFORMAS, State of the Food Supply New Zealand 2019 report writes, 'A poor diet is a leading cause of early death in New Zealand accounting for nearly 20% of illness and premature death in 2017 (H, 2019). As processed or pre-prepared food, produced by the food industry is the most commonly consumed food in high-income countries like New Zealand and Australia, FSANZ has an important role to play in creating healthier food environments and contributing to efforts to improve the diets of New Zealanders and Australians (J van Raaij, 2019). An unhealthy diet and obesity are two of the biggest modifiable health risks in New Zealand, further highlighting the importance of FSANZ supporting a food environment that allows consumers to make the healthy choice (Sally Mackay, 2019). RPH appreciates the work FSANZ does to support food businesses to understand their role in the supply chain to result in food businesses being more accountable for reducing risks related to food, ensuring consumers are able to make informed choices, promoting food choices and enhancing the nutritional qualities of foods. RPH additionally suggests prioritising not only the voice of food businesses, but also engaging with consumers to ensure that FSANZ is able to promote and embed a safe and healthy food culture right across the food system (from primary production to the consumer's plate).

Although RPH supports the key range of stakeholders listed, RPH is concerned that the voices that have influenced the content of aspirations are from high level stakeholders. Without effective engagement with iwi, aboriginal communities, low-income people, and those who are less advantaged, there is risk that the decisions made by FSANZ may have unintended consequences that may exacerbate inequities.

RPH appreciates being consulted regarding feedback for the proposed aspirations for the food regulatory actions and high level actions. RPH recommends consulting with a broader range of stakeholders in order to get a full picture of the health system.

Furthermore, relating to the New Zealand context, RPH recommends that aspirations include Te Tiriti o Waitangi, through participation, partnership and protection. While obligations under Te Tiriti o Waitangi should underpin the aspirations, we urge an explicit priority to be stated to highlight the importance of partnership of New Zealand Food Safety with Māori. We recognise that FSANZ is an Australasian institution, however incorporating Te Tiriti o Waitangi is imperative within the New Zealand context.

4 Are there any aspirations or high level actions that you disagree with?

Not Answered

If you answered 'yes', which ones and why? :

No further input required.

References

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