

## **Submission to the Horizon Scan to Support Strategic Planning for the Australia New Zealand Food Regulatory System for 2023-2026 August 2022**

### **About this submission**

The George Institute for Global Health is pleased to contribute to the public consultation on the Horizon Scan to Support Strategic Planning for the Australia New Zealand Food Regulatory System for 2023-2026.

The George Institute commends the inclusion of matters of significant concern to public health within the Horizon Scan. We further wish to note our support for the approach the Horizon Scan takes, which recognises the interplay of global mega trends on health outcomes.

We do, however, join our public health and consumer colleagues in raising a number of key concerns regarding the Horizon Scan, both in terms of substance of the document and how it sits within the broader strategic planning and regulatory reform context. Most notably:

- The processes and intended outcomes of both this specific consultation and broader strategic planning work have not been made clear to all stakeholders, through either direct communications or through the material provided and the Stakeholder Forum.
- How this consultation and its outcomes relate to other reform work currently underway, such as the Food Standards Australia and New Zealand (FSANZ) Act Review and the development of Aspirations for Australia and New Zealand's Food Regulatory System.
- The Horizon Scan does not adequately prioritise the significant and increasing burden of diet-related chronic disease in Australia and the root cause of this, being the proliferation of unhealthy food environments.
- The Horizon Scan does not recognise the role of our food regulatory system in facilitating these trends to date and its great potential to arrest them.

The George Institute welcomes the opportunity to further engage with the Food Regulation Secretariat, Food Regulation Standing Committee and Food Ministers on priorities for the food regulatory system and related issues outlined in our submission. We also would welcome the opportunity to provide further evidence to support our submission below.

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## About The George Institute for Global Health

The George Institute for Global Health is a leading independent global medical research institute established and headquartered in Sydney. It has major centres in China, India and the United Kingdom, and an international network of experts and collaborators. Our mission is to improve the health of millions of people worldwide by using innovative approaches to prevent and treat the world's biggest killers: non-communicable diseases (NCDs) and injury.

Our work aims to generate effective, evidence-based and affordable solutions to the world's biggest health challenges. We research the chronic and critical conditions that cause the greatest loss of life and quality of life, and the most substantial economic burden, particularly in resource-poor settings.

Our food policy team works to reduce death and disease caused by diets high in salt, harmful fats, added sugars and excess energy. The team conducts multi-disciplinary research with a focus on generating outputs that will help governments and industry deliver a healthier food environment for all.

## Acknowledgement of Country

The George Institute for Global Health acknowledges the Gadigal People of the Eora Nation as the Traditional Custodians of the land on which our Australia office is built and this submission was written. Parts of this submission were also written on the lands of the Wurundjeri People of the Kulin Nation.

We pay our respect to Elders past, present and emerging.

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**Question 1: Are the trends, issues, risks, and opportunities affecting the broader food system accurately captured in the Horizon Scan? If you answered no, which matters have not been captured?**

The George Institute agrees with the matters captured within the Horizon Scan, however we consider that several important matters have either not been captured or adequately reported.

**Unhealthy food environments:** The George Institute strongly recommends the inclusion of ‘the rise of unhealthy food environments’ as a megatrend. The elevation of this issue to a megatrend reflects its central importance to both the community and the food regulatory system and is critical to ensure that the main issues affecting our food system are adequately represented and reflected in strategic planning into the future. Relevant issues to refer to include:

- An unhealthy food supply [1] and unhealthy dietary patterns [2, 3] dominated by ultra-processed products,
- The mass promotion of unhealthy products to consumers [4-11],
- The commercial drivers and regulatory enablers of this trend [12],
- The burden of disease associated with poor diet and overweight and obesity [2, 13-15],
- The economic impacts of this burden of disease [16], including the immediate and ongoing costs to governments and individuals, and
- Persistent inequities in how unhealthy food environments [17-20] and diet-related chronic disease manifest in Australia and New Zealand [14].

**First Nations:** The George Institute strongly recommends the inclusion of Aboriginal and Torres Strait Islander and Māori people’s voices throughout the Horizon Scan. The current iteration does not adequately capture the experiences of and opportunities for these groups, beyond food insecurity.

**Alcohol:** The George Institute recommends the inclusion of the continuing challenges posed by pervasive availability and marketing of alcoholic beverages [21]. This has not been addressed, other than to mention its significant contribution to the burden of disease in the Horizon Scan.

The George Institute recommends the following issues be included under the existing megatrends to ensure further discussions are adequately informed by current and future circumstances and risks.

- **“More from less: More demand for limited resources – food production must increase at the same time as resource consumption must decrease”**
  - The decrease in the nutritional quality of the food supply overall due to the proliferation of highly profitable ultra-processed foods
  - Increases to cost of living, particularly in prices of fruit and vegetables, which may push consumers towards unhealthy, and ultra-processed foods
  - Inequities in the distribution of healthy food
  - The need to consider how to maintain food production and processing and secure supply chains amidst global environmental change
  - Consideration of the efficiency of alternative primary production methods for both environmental and commercial benefits

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- The potential for localised food systems to decrease food waste, reliance on processed products, and environmental impacts of the food industry, including through trade
- Increased food safety risks not just from pollution or foodborne illnesses, but also environmental factors contributing to other acute (for example, anthrax) and chronic (for example, aflatoxins) risks
- The risks posed by further relying on forms of regulation that involve less government oversight of industry and/or increasing devolution to industry. These risks include reduced capacity to proactively monitor and identify risks to public health, to collect, analyse and report data, and to introduce policies and interventions that can meaningfully impact population health to prevent chronic disease and early mortality
- The risks posed by adopting standards, protocols, and assessments from other jurisdictions that have not considered specific Australian and New Zealand food systems, priorities and populations
- Public health measures and proposals are not given priority over food industry concerns, leading to a lack of reform and failure to implement interventions that could better protect public health
- What the “desired outcomes” are. This is essential to understanding how the food regulatory system has performed to date and how it must be reformed to achieve those outcomes
- **“Going, going ... gone? Breach of environmental limits – tackling global environmental challenges will require collaborative efforts”**
  - The recognition that intensive, industrialised and globalised food systems have had an impact on, and been greatly impacted by, environmental factors and the breach of environmental limits for decades. That is, this is not an unknown, new or emerging impact. It must also be acknowledged that communities and advocates within Australia and New Zealand and around the world have been experiencing and raising these issues for a long time
  - Inputs into production, manufacturing, processing and other factors that have environmental impacts that aren’t directly related to global environmental change, for example industrial fertilisers relying on finite resources such as potash, or the spread of pesticides and genetically modified crops beyond property boundaries affecting certifications
  - The recognition that government is an important mechanism to address global environmental change, and that preventing and managing conflicts of interest are important considerations when collaborating with various actors
- **“Silk highway/Geopolitical tensions: Shift in global economy & fractal politics – shifts in global geopolitical and economic landscape will test resilience and agility”**
  - Recent global disruptions such as the war in Ukraine and the COVID-19 pandemic have highlighted the interdependence of global food systems. It must be recognised that a sufficient volume of healthy food is available in Australia and New Zealand [22] already. The social, economic and environmental benefits of seasonal, localised approaches to food systems should be investigated
  - Impact of trade agreements and mechanisms, including investor-state dispute settlement provisions, in increasing exposure to unhealthy imported food products and reducing capacity to regulate to protect the health of people living in Australia and New Zealand

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- Trade is presented as a positive outcome, however the mechanisms by which exporting and importing industries are supported may undermine public health. This risk must be acknowledged and managed when considering proposals that aim to boost trade opportunities
- **“Forever young: Ageing population, high chronic disease & spiralling health costs – while the global population is growing, people are also living longer, resulting in ageing population structures and high morbidity”**
  - The increasing burden of disease, primarily from dietary risks, is occurring at all ages
  - It must be acknowledged that recent, largely voluntary, efforts by the food regulatory and health systems in Australia to improve food environments and protect public health have not proven effective in reducing the burden of diet-related disease. Any discussion of past and current initiatives in this space must accurately reflect this experience and consider the reasons for their failure to address the increase in diet-related chronic disease and overweight and obesity
  - Food security must encompass the availability and accessibility of a sufficient quantity of healthy, nutritious food
- **“Virtually here: Changes to how we interact & do business – the deep immersion of people in a world that is virtual brings opportunities and challenges”**
  - Regulation has not kept up to date with technological progress and changing consumer habits, despite clear trends over decades. For example, the Food Standards Code does not require declarations of nutrition information, ingredients, and allergens in online supermarkets, despite the inaccessibility of product labelling to consumers in these settings
  - The use of technology to provide greater information to consumers, for example through QR codes, must not replace traditional, more accessible, and immediate forms of labelling. This is particularly important for health-related issues such as warning labels on alcohol or nutrition, ingredient, and allergen information. Digitising health information could potentially increase risk to consumers, and permit greater use of marketing techniques on packaging
  - New forms of marketing beyond the traditional physical or even digital channels, for example social media influencers, are continually evolving and must be monitored
- **“Great expectations: Shift in consumer wants & needs – rise of societal and consumer expectation for experiential rather than material goods”**
  - Consumer demand for products that are healthy and environmentally sustainable should be met via meaningful improvements at the production, manufacturing, promotional and retailing stages, rather than simply relying on consumer use of labelling to make decisions. This includes through policies and regulations on reformulation and restrictions on marketing, which are amongst the easiest and most cost-effective steps to take
  - Accuracy of labelling must encompass transparent accounts of the health and environmental impacts of a product, and must include a more rigorous health and nutrition claims system (of assessment, monitoring, and enforcement) – all promotional claims must be accurate

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**Question 2: To what extent are there activities underway within your organisation, to manage these issues and risks and to leverage these opportunities?**

**Healthy Food, Healthy Planet, Healthy People Centre for Research Excellence:** The George Institute is leading the new [Healthy Food, Healthy Planet, Healthy People Centre for Research Excellence](#) (CRE). This collaboration of investigators from 12 organisations, four Australian states and four countries aims to help address the combined health and environmental impacts of the food system to improve the health of both people and the planet. The CRE will develop and deliver world-leading innovations that estimate the human and planetary consequences of varying patterns of food and beverage consumption.

The CRE will:

- Identify effective means of conveying combined nutrition and sustainability information.
- Use the developed algorithms, environmental indicators and user response data to model the impact of various policy options on human and planetary health outcomes.
- Develop evidence-based recommendations for government-led and market-based strategies to improve the nutritional quality and sustainability of the food supply.
- Work with consumers, industry and government to accelerate uptake of the research findings.

Outcomes will be of interest to consumers, governments and food industry stakeholders, and will support the development of policies to promote healthier, more sustainable population diets. The CRE is funded by the National Health and Medical Research (NHMRC).

[The George Institute](#) is also continuing its world-leading and impactful programs of work on food policy, the relationship between food systems and global environmental change and the commercial determinants of health, and is a designated [World Health Organization Collaborating Centre on Population Salt Reduction](#), tasked with supporting WHO Member States to achieve global targets to reduce population-level salt intakes.

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**Question 3: What opportunities do you consider exist for future work or partnerships, for mutual benefit?**

The term “mutually beneficial” in this context is unclear, and without adequate definition could lead to a distortion of the intention and necessity of partnerships with stakeholders who have a conflict of interest. It further implies that there can be some trade-offs in benefits and harms, with the potential to undermine efforts to protect public health from unhealthy food supplies and environments.

The George Institute strongly recommends public health primacy within the food regulatory system. We caution that the continuation of partnerships with stakeholders who have a conflict of interest will undermine the social licence for industry and governments to operate with the trust of the public, as well as the capacity of governments to address the increasing burden and costs of diet-related chronic disease [12, 23-29]. The institution of best practice conflict of interest management and prevention processes must be instituted as a priority (for example, the current review of the Australian Dietary Guidelines). This involves excluding actors who cause harm to the community from participating in the development of policy and regulation [30]. This will improve transparency and accountability for all stakeholders and help promote public confidence in the food regulatory system and the actions of governments.

Action must be evidence-based and led and enforced by governments to ensure that the primary objective of the system, to protect public health, including long-term health, is achieved. This must also include the introduction of modelling, particularly in regulatory impact statements, that adequately considers and costs the benefits and harms to public health of any potential policies or regulations. More modelling is also required to demonstrate the most effective and cost-effective options to address diet-related chronic disease.

The George Institute strongly rejects any further efforts to reduce or undermine the role and capacity of governments, through the food regulatory system, to protect the community from the harm caused by unhealthy food environments. Previous and ongoing self-, quasi- and co-regulatory approaches have not proven effective in protecting public health [12]. The food regulatory system must retain a central and effective role in regulating and monitoring the food system to protect the community from unhealthy food supplies and environments, both in relation to acute food safety and long-term health outcomes. The strategic planning process for the food regulatory system must focus on supporting capacity to meet its primary objective to protect public health.

Finally, meaningful engagement with public health and consumer representatives has many benefits for governments and the food regulatory system. Across Australia and New Zealand there are many organisations and individuals with significant expertise and experience in the development and implementation of evidence-based solutions, as well as monitoring and evaluation. Public health and consumer representatives have great capacity to reach the community and are trusted by the community to work towards protecting and improving their health and wellbeing. The George Institute recommends opportunities to better engage with public health and consumer representatives be further explored.

**Action on Priority 2:** There has been limited progress, in terms of outcomes, in activities under Priority 2 for the food regulatory system over 2017-21. The 2023-26 planning cycle must prioritise activities under Priority 2 and ensure that outcomes are available before the end of the cycle.

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#### Question 4: Would you like to add anything else to your submission?

The primary objective of our food regulatory system is to protect public health, including long-term health. The George Institute recommends that the identified issues affecting our current and future food systems should drive any regulatory reform, and that the primary focus of regulatory reform be to better ensure the system can protect and promote public health.

**Priorities of the food regulatory system:** The George Institute supports the retention of the three 2017-21 priorities over 2023-26, however we recommend some critical amendments to better reflect the circumstances facing the food regulatory and health systems:

1. Reducing foodborne illness
2. Supporting public health objectives to reduce diet-related chronic disease and overweight and obesity
3. Maintaining a comprehensive and effective food regulation system that meets public health objectives

#### Amendments to existing workplan:

- Activities under Priority 1 should take into consideration the impacts of environmental factors beyond what is already in Horizon Scan, which only refers to the risks of pollution and food poisoning.
- Activities under Priority 2 should continue, with the exception of nationally consistent menu board labelling.
- The additional work items not previously aligned with a priority (i.e., review policy guidelines and statements and address concerns raised with Standard 1.2.7) should also now be included under Priority 2.
- The previous and continuing work to investigate options to improve the composition and healthiness of the food supply must be expanded beyond trans-fats and sugar-sweetened beverages. This work should explicitly consider high-impact interventions such as robust and mandatory sodium and added sugar compositional limits, and other activities including the promotion of sodium-reduced salts and the effective use of public procurement policies to promote healthier environments.
- We recommend that a new activity, the development of a comprehensive national food and nutrition policy, be added to Priority 2, as per the recently adopted (Australian) National Preventive Health Strategy. Some useful groundwork already exists to rapidly advance this activity, for example the [position statement](#) and [background paper](#) developed through efforts led by the Public Health Association of Australia. This national food and nutrition policy must be finalised before the end of the next planning cycle, and it must inform the next round of strategic direction and priority setting.
- Activities under Priority 3 must help ensure the effectiveness of the food regulatory system in the first instance, i.e. to meet its objectives to protect public health, including long-term health, and all activities should be coordinated and systematic to ensure coherence of strategic planning and the ability of the system to progress activities and achieve objectives.

**Additional priorities:** Drawing upon the Horizon Scan and our comments above, The George Institute also recommends the addition of equity and planetary health as two separate, overarching priorities that must be considered and reported upon as activities under the existing three priorities progress.

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## Contact

Damian Maganja  
Research Associate & PhD Candidate, Food Policy  
The George Institute for Global Health  
[dmaganja@georgeinstitute.org.au](mailto:dmaganja@georgeinstitute.org.au)

Chelsea Hunnisett  
Policy and Advocacy Advisor, Impact and Engagement  
The George Institute for Global Health  
[chunnisett@georgeinstitute.org.au](mailto:chunnisett@georgeinstitute.org.au)

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