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AMA submission to the Department of Health – Horizon Scan to support the System Strategic Direction for 2023-2026 - Australia New Zealand Food Regulatory System

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Introduction

The AMA supports the development of a ‘horizon scan’ document to inform the strategic direction for the Australia and New Zealand food regulatory system. The draft document provides a summary of the current global trends impacting the food regulatory system and provides a good starting point for evidence-based reform.

As the nation’s peak body for doctors, the AMA strongly advocates for a food regulatory system that enhances the health of all Australians, as well as ensuring that our food supply is safe, sustainable, and affordable. The food regulatory system exists in its current form primarily so consumers have access to safe food, and this should be front of mind for policymakers. The AMA suggests that from the horizon scan a set of health-based principles should be developed that clearly enshrines what the food regulatory system aims to achieve.

The AMA remains concerned that there is a heavy focus on reducing regulatory burden for the food industry. As detailed in the AMA’s submission on the *draft Regulatory Impact Statement (RIS) for the Food Standards Australia New Zealand Act 1991 (FSANZ Act)*, the RIS seemed to treat the presence of regulations as foremost, a hurdle for businesses, rather than as a necessary protection for consumers and health.¹ Similarly in the horizon scan document, there is a particular emphasis on opportunities for business and a focus on economics rather than a primary focus on public health.

A food regulatory system that successfully protects public health would see reductions in the rate of dietary-related chronic disease, along with controlling more acute threats like infectious and food-borne disease outbreaks.

¹ Australian Medical Association (2021) [AMA submission – FSANZ Act review draft Regulatory Impact Statement](#).

As the Australian health system struggles to keep up with the demand associated with chronic disease complications:

- Australians are ill-informed about added sugar in the food products they buy;
- Children are inundated with marketing for unhealthy food and beverages;
- 61.4% of eligible products have refused to take on the health star rating system; and
- Processed food products with high levels of sodium, sugars and unhealthy fats are widely available, and often the cheapest and most convenient foods for many Australians.

Renewed regulation that places the health of consumers as its primary objective is clearly needed to protect Australia's health.

The food regulatory system should more strictly regulate unhealthy food products; incentivise companies to produce healthier products; and provide consumers with better quality information about the products they are buying.

Q1. 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 AMA supports in-principle the trends, issues, risks and opportunities affecting the broader food system outlined in the horizon scan. The AMA suggests some additions and/or modifications to give the horizon scan a public health focus.

Acting on inequity through addressing social determinants of health

While the horizon scan briefly outlines issues under 'persistent inequality and food insecurity' (page 11), it does not refer to the social determinants that majorly influence population's health and access to high quality food.² Nutrition should be recognised as a clear social determinant of health and the food regulatory system should strive to address inequitable barriers to nutritious foods such as socio-economic status, education, and geographic location.

The AMA believes that the sentence stating that income is growing under the global megatrend 'great expectations' (page 5) conflicts with the reality of the wage³ and food affordability⁴ crisis in Australia. Wages are not keeping pace with inflation, and this has major impacts on the cost of living, including the cost of food. This statement does not accurately reflect that income significantly impacts nutrition and health.

The AMA recognises the importance of cultural determinants of health for Aboriginal and Torres Strait Islander peoples, including the prioritisation of Aboriginal and Torres Strait Islander-led approaches to health and wellbeing.

² Monterrosa et al (2020) [Sociocultural Influences on Food Choices and Implications for Sustainable Healthy Diets](#). Sage Journals

³ Stewart et al (2022) [The wage crisis revisited](#). The Australia Institute

⁴ Kelly (2022) [Rising food prices hit every supermarket aisle putting pressure on low-income families](#). The Guardian.

The horizon scan refers to misinformation (page 12) without mentioning the importance of health literacy in being able to choose the right foods and disseminate misinformation from fact.⁵

The megatrends ‘Virtually here: Changes to how we interact & do business’ and ‘Innovation imperative: Accelerating technological advancement’ (page 5), while important to consider, need to highlight potential challenges such as ensuring equity of access to population groups that are unable to access food via technological/digital methods. For example, people with limited digital literacy, people with limited incomes, and rural, regional, and remote locations.

Better focus on health promotion and prevention

The current food regulatory system is reactive and focussed too heavily on acute disease threats. Chronic conditions linked to dietary patterns place a much greater burden on Australia’s health system than infectious and food-borne disease.

The AMA is pleased to see that the horizon scan highlights the issues around the consumption of unhealthy and ultra-processed foods, which are a significant contribution to excess energy intake and obesity.⁶ The AMA is particularly concerned with the impacts of processed foods and foods that are high in sugar and sodium with little nutritional value on public health. The AMA’s view is that Australia’s food regulatory system has a key role to play in ensuring that we do not cause harm through the consumption of an unhealthy diet. A key aspiration is that the reform process considers ways in which we can foster good diet through food regulation.

However, beyond this specific example, the horizon scan document does not adequately highlight the opportunity for the food regulatory system to improve its capability as an avenue for health promotion and prevention. In addition to health benefits Australia’s population would experience, there is also a strong economic argument for investing in health promotion and prevention. For example, a healthier workforce would enable better income streams (thus also being able to afford more nutritious foods), and there would be a reduced need for medical services.⁷ The AMA’s submissions to the national preventative health strategy⁸ and the national obesity prevention strategy⁹ provide further information on this issue.

One Health and environmental factors

The One Health concept is currently only referred to in the context of antimicrobial resistance, while it should be applied more broadly in the food environment. One Health recognises that the health of humans, animals, and the environment are inextricably linked.¹⁰ Therefore, factors that

⁵ Australian Medical Association (2021) [Health literacy](#).

⁶ Machado et al (2020) [Ultra-processed food consumption and obesity in the Australian adult population](#). Nature

⁷ Australian Medical Association (2020) [Social determinants of health](#).

⁸ Australian Medical Association (2021) [AMA submission to the draft National Preventive Health Strategy 2021-2030](#).

⁹ Australian Medical Association (2021) [AMA submission - Department of Health consultation on Draft National Obesity Prevention Strategy 2022-2032](#).

¹⁰ World Health Organization (2021) [Tripartite and UNEP support OHHLEP's definition of "One Health"](#).

influence food security and quality such as biodiversity, environmental sustainability, climate change should also be recognised under the One Health banner.

The AMA is pleased to see environmental factors such as climate change and sustainability are highlighted in the horizon scan document.

Currently, it is difficult for consumers to compare products based on their environmental credentials. Improving the regulation of food products in terms of environmental sustainability would also have indirect positive impacts on public health. Environmental determinants, including air and water quality; biodiversity; temperatures; and extreme weather events, have significant health impacts and all sectors have a role to play in environmental protection.¹¹

The AMA would like to see the horizon scan clearly highlight the Sustainable Development Goals that relate to the food system, and the importance of aligning with them, such as ‘zero hunger’, ‘good health and wellbeing’, ‘quality education’, and ‘climate action’.¹²

Q2. To what extent are there activities underway within your organisation, to manage these issues and risks and to leverage these opportunities?

The AMA has a number of policy positions relevant to food regulation. These include:

- Support for a tax on sugar-sweetened beverages, which has clear health and economic benefits.
- Incentivising the reformulation of unhealthy products through the Health Star Rating (HSR) System, including consideration of mandating the HSR system on all packaged foods, rather than working in partnership with industry alone to set reformulation targets.
- Support for easy-to-interpret, front of pack labelling to better support consumers to make healthier food choices. This includes support for continued uptake of the Health Star Rating system, as well as specific calls for the labelling of added trans fatty acids, added sugars, and palm oil.
- Support for mandatory food fortification where substantial population-level health gains are expected. The success of mandatory folic acid and iodine fortification in bread demonstrates the value of this.
- Calls for higher-level nutrition requirements in specific settings, including the development of national nutrition standards for residential aged care facilities.
- Calls to mandate alcohol risk signage at licensed venues; increase public understanding of the size of a standard drink; implement health warning labels for packaged alcohol including pregnancy labelling; licensed premises to set a minimum floor price for alcohol; and implement education programs on alcohol risk in schools.
- Strong support for a volumetric tax on alcohol. This policy has been recommended by multiple Australian reviews and inquiries, and is proven to be cost-effective and have clear health benefit. A volumetric tax is suggested in the current National Alcohol Strategy.

¹¹ Australian Medical Association (2015) [Climate change and human health](#).

¹² United Nations Department of Economic and Social Affairs (2022) [Sustainable Development Goals](#).

The AMA works closely with Doctors for the Environment Australia (DEA) in advocacy to take action on climate change, particularly in the health sector, and raise awareness of the health impacts of climate change.

Q3. What opportunities do you consider exist for future work or partnerships, for mutual benefit?

Collaboration with the food industry

The AMA remains concerned about the influence of industry on the food regulatory system. Protecting public health and safety should take clear precedence over industry profits, trade facilitation and competition.

Reform must not lead to less oversight over food products. While the AMA supports an efficient and risk-based food regulatory system, streamlining processes for food businesses should never come at the cost of public health

The AMA does not support past proposals to rely more heavily on industry self-regulation approaches, as past experience demonstrates that self-regulation is generally ineffective in public health terms. Noting that food and beverage businesses operate as profit-driven enterprises; any industry-designed regulatory pathway will only protect public health if there is an economic or reputational incentive to do so. Current industry-led regulatory schemes, including that for alcohol marketing, demonstrate that effective controls require an adequate level of Government or independent oversight to successfully protect public health.¹³

The AMA stands with clinicians and academics around the world in calling for the alcohol and food industries to be excluded from strategies and implementation of public health measures. One of the reasons that Australia has had one of the most successful anti-tobacco campaigns in the world is because of the exclusion of the tobacco industry.

The food regulatory system must ensure it has a robust framework for managing conflicts of interest when it comes to engaging with the food industry.

Collaboration with public health professionals

Enhancing FSANZ's role in data collection and analysis would have largely positive impacts for public health. The ability to conduct a greater level of post-market surveillance of products and to track health outcomes against these could help to inform the public about the acute and long-term health risks associated with different products. Importantly, there should be an increase in FSANZ's capacity for public-facing science and data communication, to ensure that insights gained are shared with consumers for their benefit. It could also inform research from the academic

¹³ Australian Medical Association (2022) [AMA submission to the ABAC Scheme Limited – Responsible alcohol marketing code review](#).

sector on nutrition and health, and the relative impact of regulations on population nutrition outcomes.

The AMA supports enhancing interfaces across the food regulatory system and improve FSANZ's approaches to working with external stakeholders. Partnerships that allow the public health and academic sectors a greater level of access to information on food safety will have largely positive impacts for public health and consumers

Conclusion

The AMA supports the development of a 'horizon scan' document to inform the strategic direction for the Australia and New Zealand food regulatory system. While several aspects of the horizon scan document allude to health challenges in the food regulatory system, it does not go far enough in prioritising public health over industry interests. The AMA would like to see a food regulatory system that enhances the health of all Australians, as well as ensuring that our food supply is safe, sustainable, and affordable. This overall objective should be adequately prioritised when considering trends, issues, risks, and opportunities affecting the broader food system.

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