The Food and Health Strategic Research Initiative congratu-lates the Australian government for opening up discussion on the development of a National Food Plan. We urge the government to take the opportunity to rethink its approach to food-related policies and consider what type of food system is most desirable for Australia’s future.

We offer a range of comments in response to some of the questions posed in the Issues Paper.

Key points:

The vision for the Australian National Food Plan should be:

“a safe, nutritious, affordable, secure, resilient and environmentally sustainable food system accessible to all Australians for health, wellbeing and prosperity now and into the future”.

1. A set of policy priorities for food needs to be established, for example using a risk assessment model for developing the relative rank of importance of different food-related policy agendas.
2. The extent of food insecurity across population groups within Australia needs to be established and comprehensive evidence generated regarding how communities, households and individuals are affected by aspects of food insecurity and the impact it has on health outcomes.
3. Improved monitoring and surveillance of both household level food security and food prices is required to underpin action to decrease the prevalence and impacts of food insecurity.
4. Welfare and support services that ensure households are food secure are required as core to a National Food Policy.
5. Urban and social planning at state and local levels should factor in equitable distribution and access to food retail outlets providing nutritious, safe and culturally appropriate foods, especially for vulnerable communities.
6. The non-government sector should be considered as providing support services to ameliorate food insecurity in the short term only, while longer term government led programs and policies are developed and implemented to achieve food security for all Australians.
7. Use of excess food and food wastage should neither be considered as a long term solution to the provisioning of emergency foods to vulnerable individuals and households, nor as a reason for not reducing food wastage in the first instance.
8. Food security actions should cover remote communities as well as low socioeconomic status populations in urban and rural areas.
9. Government has a leadership role in working with the food industry to encourage, facilitate and at times require their alignment with a safe, nutritious, affordable, secure and environmentally sustainable food system.
10. Such leadership should include government requirements for a Multiple Traffic Light system across food labelling, foods prepared away from home and institutional food services.
11. Recommendations made in the Labelling Logic report, in particular those regarding consumer values issues and adequate mechanisms to facilitate effective monitoring and surveillance should receive government support.
12. Broadly based food and nutrition research should have an identifiable funding mechanism that is adequately supported.
Key challenges:
We identify the following key challenges that need to be addressed by a national food policy:

- lifestyle diseases related to food consumption that result in higher rates of death and disability and economic costs of health care delivery and decreased productivity
- inadequate levels of welfare support and services to address the needs of food insecure communities within Australia, including but not limited to indigenous Australians, low income, elderly, single parent households, non-English speaking communities
- food supply chains that are driven by a limited number of retailers, producing vulnerabilities in rural communities and higher environmental costs
- challenges being faced in food production through climate change, global competition and decreasing access to key inputs such as land availability, water and fertilizers
- limited sustainability of current food production practices to adapt to changing conditions and demands, and
- inefficiencies in the food supply chain resulting in 30-50% food wastage.

About the Food and Health Strategic Research Initiative:

The Strategic Research Initiative (SRI), ‘Food and Health’ brings together the clinical research capacity of the Smart Food Centre (SFC) with capacities in Public Health Nutrition (PHN) at the University of Wollongong. It also links the Nutrition and Population Health streams of the Illawarra Health and Medical Research Institute (IHMRI). Members of the Food and Health SRI are academic staff of the School of Health Sciences, and Smart Foods Centre research fellows or associates.

Vision

To improve the health of populations via research on the effect of food, nutrition and dietary patterns on the health of individuals and sub-populations; and to examine ways in which inter-sectoral changes can occur to support healthier food choices; including the support of public health nutrition policy.
Commentary

Qu 1 – What is the most important thing a National Food Plan should try to achieve?

A National Food Plan should aim to achieve a sustainable, sufficient, resilient and healthy food system that ensures the health of Australia’s people. A country’s future is dependent on an assured food supply, not only for the health of its people but also for economic development.

In addition, a National Food Plan should take into consideration its contributions to, and impacts on, sustainable food systems that support the health and economic stability of other countries.

Qu 2 – What are the vision and objectives for a National Food Plan?

The vision for the Australian National Food Plan should be:

“a safe, nutritious, affordable, secure, resilient and environmentally sustainable food system accessible to all Australians for health, wellbeing and prosperity now and into the future”.

This should be a shared vision by the Australian governments, not the remit of a single sector or jurisdiction, and should be reflected across all policy domains, as the food system is core to Australia as a country, the health of its people, its security and its success into the future.

Fundamental to a National Food Plan should be a process of food democracy that engages governments with Australian communities and enables a share vision of the Australian food system to be developed and put into practice. Objectives for the National Food Plan should be developed through this process.

Possible objectives may include:

1. To develop a food system that is environmentally sustainable, flexible and responsive to environmental changes, either manmade or natural.
2. To make available sufficient, affordable, safe, nutritional and environmentally sustainable food to support the achievement and maintenance of the health of all Australians.
3. To support active research and evaluation that:
   a. explores the efficiencies, benefits and costs (environmental, social and economic) of diverse food production and provisioning systems to achieve the most effective environmentally sustainable methods, and
   b. investigates and identifies alternative food sources and types that can sustainably support nutrition of Australian communities.
4. To prevent and reduce the impact of diet related ill-health, including that associated with food insecurity, for Australian communities.
5. To engage all Australians in effective food decision-making through supporting appropriate education and infrastructure that is designed to enable them to understand, access, choose, consume and enjoy a high quality diet that supports a safe, nutritious, affordable and environmentally sustainable food system.
6. To support Australian and overseas farmers to produce food using economically and environmentally sustainable practices.
7. To ensure that Australia’s food system is based on human values of ethical production of food, human rights and animal welfare.
8. To increase efficiencies across the food chain to minimise food waste.
9. To work across all government sectors to ensure policies facilitate and enable all Australians to access and afford sufficient, safe and healthy foods to sustain their and their family’s health and well-being.

10. To work with other nations and communities to support development of environmentally sustainable food systems.

These objectives are not unique to the Australian food system – they are global challenges. Australia now has the opportunity to take serious and comprehensive action to develop its future food system and enable the survival of our future generations. We contend that a ‘business as usual’ approach will not suffice and new ways of thinking are required. We encourage the Australian government to take up this challenge.

It is important that the Australian government clearly articulates the principles upon which its National Food Plan will be based. We suggest the following principles are essential for the National Food Plan to be effective in the long term:

1. A whole of government approach, with coordinated effort across sectors
2. Food sovereignty, enabling active community participation and public accountability
3. Protection of public health and safety, particularly through ensuring diet quality, food security, food safety and nutrition
4. Ecologically Sustainable Development, particularly environmental sustainability and waste minimisation
5. Sustainable economic development and growth
6. Social justice - social inclusion, access and equity
7. Industry innovation, combined with social responsibility and accountability
8. Evidence informed decisions, with support for research and evaluation where evidence is absent
9. Attention to and support for well-trained agri-food, food technology and public health nutrition workforces.

12. Do you think that the development and implementation of government policies related to food are adequately coordinated? If not, please explain why and provide examples. What mechanisms could the government consider that might address your concerns?

1. A set of priorities for food needs to be established, for example using a risk assessment model for developing the relative rank of importance of different food-related policy agendas.

There are a range of government policies that address different aspects of food. These policies are not necessarily cross referenced. Mapping out the purposes and implementation strategies for these policies is an appropriate starting point to identify connecting pathways and how the different policies could integrate into a single framework, including the relative ranking of importance of different food-related policy agendas.
13. Have all possible risks to Australia’s food security been identified in this paper? If not, what other risks are you aware of?

2. The extent of food insecurity across population groups within Australia needs to be established and comprehensive evidence generated regarding how communities, households and individuals are affected by aspects of food insecurity and the impact it has on health outcomes.

In the Issues paper, the government recognises that food security in Australia is a major priority. Food as a human right was adopted by the Universal Declaration of Human Rights back in 1948 (Gorton, Bullen et al. 2010). By citing the FAO’s definition of food security, the Issues paper acknowledges the issue as a complex, multi-factorial experience.

The Issues paper did not include coverage of all groups who are vulnerable to food insecurity. It raised relevant issues to food security including poverty as a major risk factor and, of increasing importance, mentioned the need for appropriate food quality and quantity for optimal health and well being. A number of sub populations were referred to including very old Australians and Indigenous, as well as new migrants (this should include both refugees and international students). Other vulnerable groups include the homeless, single parent households, the unemployed, young people aged 18 to 24 years. Preventive measures to reduce the risk of food insecurity in these groups needs to be considered (Booth and Smith 2001).

High food prices are an ongoing concern and the greatest increases in food prices are for foods beneficial to health. In addition, the issue of food imports comprising mainly cheap, processed foods of lesser nutritional value should be a major issue of concern in a National Food Plan. Food is often the first part of household budget to be cut. Diet quality is lost as food costs increase and other household expenditure costs affect the amount of money available for food (Babbington and Donato-Hung 2007; Kirkpatrick and Tarasuk 2007). In the Illawarra region, the price of fruit, measured as part of a healthy food basket, increased by over 60% from 2000-2009 compared to the total basket increase of 38% (Williams 2010). In Queensland, the costs of healthy foods have increased by more than the energy dense nutrient poor foods, between 2004-2006. Increased food prices with remoteness are recognised but limited availability of healthy foods has also been reported (Harrison, Lee et al. 2010). Methods of food distribution to remote areas should be discussed as a priority so that remote populations have equitable access to affordable healthy foods.

14. What specific additional actions by:

the government sector would most benefit our food security status

3. Improved monitoring and surveillance of both household level food security and food prices is required to underpin action to decrease the prevalence and impacts of food insecurity.

Monitoring and surveillance of food security at the national level has been sporadic in recent years and it is currently not possible to accurately report the true rate of food insecurity within Australia. A single item question was included in the 1995 National Nutrition Survey as well as the 2001-2002
and 2004-2005 National Health Surveys but was not included in the most recent National Health Survey.

A single item question is insufficient to determine accurately the rate of food security within households. Existing evidence is based on the single item “In the past 12 months were there any times when you ran out of food and couldn’t afford to buy any more?”, the tool is focused solely on economic access to food, and does not allow for the acquisition of adequate quantity nor quality of food to achieve optimal health and wellbeing, nor how food is distributed within the household.

It is important to establish methods and tools to regularly monitor these other aspects of food security, and thus be able to use the information to inform support services, practices and preventive action. The Household food Security Survey Module (HFSSM), an 18 item tool (with eight questions relating to children in the household), is a comprehensive measurement tool that can determine food security status as well as severity ranging from anxiety, reduced quality to reduced amount of food consumed (Nord, Coleman-Jensen et al. 2010). The HFSSM has been used regularly in the USA to measure food insecurity and most recently found that 14.7% of US households reported being food insecure in 2009. This compares to around 5% prevalence of food insecurity measured in Australia from the single item (Temple 2008). The Issues paper suggests only those who are SES disadvantaged are likely to be food insecure but food insecurity may also be present in those with poor health, limited physical function and limited physical access to food outlets.

Monitoring the cost of a healthy food basket also needs to be incorporated into any National Food Policy in order to ensure the affordability and availability of foods required for a healthy diet in all regions of Australia. Previous healthy food basket surveys have shown evidence of differences in prices and availability between urban, rural and remote regions which can be used for developing appropriate support systems for those areas incurring higher food prices (Burns and Friel 2007).

4. **Welfare and support services that ensure households are food secure are required as core to a National Food Policy.**

With the erosion of welfare benefits over the last 2 decades, together with the increasing costs of foods generally and of healthy foods in particular, closer scrutiny is required of the adequacy of welfare benefits to vulnerable households. Regular monitoring of the capacity of beneficiary households to meet adequate and healthy dietary intakes should be introduced, with welfare benefits linked in an appropriate manner to food costs.

5. **Urban and social planning at state and local levels should factor in equitable distribution and access to food retail outlets providing nutritious, safe and culturally appropriate foods, especially for vulnerable communities.**

Households in more disadvantaged areas are more likely to be closer to fast food outlets than major supermarkets which impacts on quality of diet and obesity (Burns and Inglis 2007). Local level food initiatives are expanding and provide opportunities for contributing to a diversified and more resilient food system for the future (Sydney Food Fairness Alliance, 2009).
the non-government sector would assist in maintaining our food security status?

6. **The non-government sector should be considered as providing support services to ameliorate food insecurity in the short term only, while longer term government led programs and policies are developed and implemented to achieve food security for all Australians.**

A number of non-Government sectors (Anglicare, Foodbank Australia) already provide services to reduce food insecurity in the short term by providing food aid but the food may be inadequate or socially inappropriate (Babbington and Donato-Hung 2007). These are not-for profit organisations that rely on food and grocery donations and, as emergency food aid, are not sustainable or a practical solution to food insecurity.

Governments at all levels should work collaboratively with a range of stakeholders from food and non food related industries for long term food security to ensure safe, nutritious and accessible food to households and individuals.

7. **Use of excess food and food wastage should neither be considered as a long term solution to the provisioning of emergency foods to vulnerable individuals and households, nor as a reason for not reducing food wastage in the first instance.**

Estimates of food wastage within the Australian food system vary between 15-36 % (Morgan 2004, Hamilton et al. 2005, Parfitt et al. 2010). Not only is such waste expensive across the food system, it is not sustainable with regard to the increasing pressure to make available more food for growing populations. The food made available to food insecure households is often not that required for good health and the welfare agencies have little capacity to provide the best food choices to their vulnerable clients.

Further, such waste represents overuse of agricultural chemicals and fossil fuels, not environmentally sustainable for Australia’s future food system. Government should work with industries to develop effective and efficient mechanisms to reduce food wastage across the food system.

16. **What specific actions would help improve food security in remote indigenous and low socioeconomic populations?**

8. **Food security actions should cover remote communities as well as low socioeconomic status populations in urban and rural areas.**

Although the Issues paper recognises that remote and rural indigenous populations are at greater risk of food insecurity, the majority of indigenous Australians live in regional and urban areas (74%) (ABS, 2006, p13) and food insecurity is also an important issue among these population groups; reasons around this include affordability, but also access and availability may be limited in some population groups (Gwynn & Turner, 2010).

Improvement of access and availability of socially acceptable foods in remote and urban regions does require considerable further investigation. There is potential for innovation for the preservation of nutrients within ‘healthy’ foods that may increase the shelf life of such foods. In the
short term subsidising costs of healthier foods would make them more affordable for this population. In the longer term, locally based approaches to food access and affordability are required, including strategies such as local enterprise food initiatives, food-related workforce education, training and employment and industry innovation with a focus on food production utilising plants adapted to local environmental conditions.

17. Do you see a role for the food industry in supporting population health and nutrition outcomes? If so, what do you believe that role is and what support might industry need in fulfilling this role?

9. Government has a leadership role in working with the food industry to encourage, facilitate and at times require their alignment with a safe, nutritious, affordable, secure, resilient and environmentally sustainable food system.

10. Such leadership should include government requirements for a Multiple Traffic Light system across food labelling, foods prepared away from home and institutional food services.

Food supports population health and nutrition outcomes, and as the food industry has a stewardship role in the delivery of food, it clearly has a very significant role. It is important to recognise the variation in the overall profile of the food industry and to identify where different categories fit within the food supply chain before making statements on ‘the food industry’ as a whole.

A healthy diet should comprise primarily fresh or minimally processed foods. Government support should be directed at underpinning horticultural production that is resilient, sustainable and economically competitive.

The processed food industry and food retailers will require significant support to rethink their current practices to align with achieving this goal. One example is government incentives to develop new methods of producing minimally processed primary food products via convenient and safe mechanisms (eg via vending machines).

These constraints have implications for knowledge frameworks, attitudes, and skills/capacities that may have developed independently for some time. Frameworks for research and development need to be mutually developed and they need to support reward systems in both public health and business, bearing in mind that this is also likely to be problematic. It is not likely to be achieved until a shared value system is achieved and this may be a primary role of an overarching national entity with the responsibility for food.

Other government support may include working with sectors of the food industry to encourage and facilitate the provision of healthier food options and nutrition information at point of sale / on food labels, in formats that are readily understandable by vulnerable shoppers. As recommended in the Labelling Logic report (Blewett et al 2011), a multiple traffic light system is the system has most evidence of effectiveness with vulnerable populations. A MTL system should be uniformly applied across retail (front of pack), QSR, restaurants and also institutional (eg schools, prisons, hospitals) and workplace food services, to reinforce recognition and maximise impact on food selection behaviours.
Genuine engagement with various sectors of the food industry in a principled approach to public health will be a starting point. This could be overseen by a national public health entity (e.g., Australian Preventative Health Agency) that references relevant government departments. This engagement would require the development of a mutual understanding of the constraints on practice in both public health nutrition and business environments.

18. Some food industry sectors have developed tools to demonstrate desirable product attributes to consumers, for example through organic or environmental certification. Do you know of any examples of food supply markets that are not adjusting to evolving consumer demands (that is, potential market failures)? What are they and how could they be encouraged to adjust (that is, not fail)?

11. Recommendations made in the Labelling Logic report, in particular those regarding consumer values issues and adequate mechanisms to facilitate effective monitoring and surveillance should receive government support.

The use of logos on labels and certification schemes by industry will only be effective if adequate monitoring and surveillance systems are in place and the schemes cover all relevant industry groups. We support the Labelling Logic recommendations listed in chapters 6 & 8.

37. What could government do to accelerate food and nutrition research and development to successful commercialisation outcomes?

12. Broadly based food and nutrition research should have an identifiable funding mechanism that is adequately supported.

It needs to first define what it means by ‘successful commercialisation outcomes’. That aside, the government needs to accelerate food and nutrition research and development. It needs to do this in a much more strategic and outcomes oriented manner that better aligns with the future vision for food and nutrition policies.

A framework needs to be developed for understanding the significant impact of individual foods and dietary patterns on the health of Australians so that food production policies and directions for food innovation can be better informed within an evidence-based framework. Acceleration of research outcomes may be achieved by developing a National Food and Nutrition Research Council, perhaps within the infrastructure provided by the ARC or NHMRC, accessing the full gamut of food and nutrition disciplines and provided with an appropriate strategic research budget.
38. What measures or alternative approaches could the government introduce or encourage that would facilitate greater use of public research facilities by small to medium enterprises in the food industry?

This question might better be answered after the question, what is the function of SME’s in the Australian food industry? This also begs a review of the whole structure of the food industry in Australia, how it operates and what might work best for Australia.

References

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