Futures@csiro.au
Ms Lisa Jarrett,
Manager at CSIRO Futures
Building 101, Clunies Ross Street
Black Mountain ACT 2601

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RE: Transforming Australian Food Systems: Discussion Paper

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public's health in Australia and seeks to drive better health outcomes through increased knowledge, better access and equity and evidence informed policy.

In CSIRO's Roadmap towards investigating and defining a vision for Australia's food system, PHAA welcomes the themes of food security and food system emissions being main foci. These areas of food and nutrition policy are important, especially as climate change will continue to strain our food systems in the foreseeable future. We encourage CSIRO to read our submission to the Commonwealth House of Representatives Standing Committee on Agriculture, regarding Strengthening and Safeguarding Food Security in Australia to gain a broader understanding of our stance on these issues.

However, we believe that improved consultation with food and nutrition health stakeholders should significantly inform the proposed visions for Australia's future food system and the actions to achieve them. This will help ensure that a future state genuinely reinforces population health, social wellbeing, and environmental sustainability, within an economy that is directed towards these goals while still supporting jobs, communities, and industry.

Diet-related illness is a major contributor to chronic disease and early death in Australia, with our communities beset by unhealthy food environments that reduce (and in some cases inhibit entirely) the ability to follow healthy dietary patterns. Fortunately, much of this diet-related disease is preventable if action is taken at a systems-level. There is a plethora of multi-disciplinary systems research, action plans and strategies already available to work towards these ends. The issues are long-standing and well-understood, and effective and evidence-based solutions that support community health, the environment, and the economy without pitting one against another already exist. We strongly recommend that these be incorporated into the Roadmap as key actions to realise a better and more sustainable future. We appreciate the opportunity to provide the following further recommendations that would achieve a more considered and informed Roadmap.

Focus Area 1: Enabling equitable access to healthy diets

Question 1. How can industry, government and communities work together to increase the adoption of more sustainable and nutritious diets?

Industry interests lie in making profits and therefore do not always align with the health interests of Australians. Therefore, the "adoption of more sustainable and nutritious diets" is not simply a matter of individuals making better choices, but instead would rely on all parts of the food system (including industry) fully supporting healthy dietary patterns.[1]

Australia needs industry to reduce the manufacture, promotion and marketing of unhealthy, ultra-processed products and increase the affordability, availability, and accessibility of healthy and environmentally sustainable choices. These factors must apply to all, regardless of location, socio-economic status, or background.

It is inappropriate for industries to be given free predatory reign over consumers, particularly in areas that could be described as food deserts - places where people cannot make healthy food choices by default. The combination of food deserts in areas with low socio-economic status compounds the health challenges faced in these communities.[2]

Recommendations:

- Reject the notion that individual behaviour change is the major factor to improve healthy and environmentally sustainable dietary patterns.
- Acknowledge that unhealthy food environments are driving diet-related disease.
- Reduce supplier-induced demand through marketing/promotions and availability.

Question 2, What legislative and policy opportunities can ensure equitable access to healthy diets? & Question 3, Are there any other R&D priorities that should be addressed to ensure Australian food systems become more equitable?

Rather than solely pushing the "individual actions/choices" narrative, we need to recognise that commercial interests deliberately target people with the production and marketing of their unhealthy products.[3] Immediate priorities in this Roadmap should address the need for equitable access to healthy foods that are available to all, free of barriers and commercial influence. A major factor in ensuring equitable access is by creating a food system which has nutrition as a core value and driver.

We recommend that this Roadmap should focus on "Transforming Australian Food and **Nutrition** Systems". A transformation to a system which can sustainably produce nutritious food and aims to lower the rates of diet-related disease. Such a system would evaluate the conflicting interests in the food industry and create regulations to ensure a nutritious and environmentally sustainable future for all people living in Australia.

Fortunately, legislative and policy opportunities to address equitable access have already been identified in key national strategies. In the National Obesity Strategy, the following enablers directly answer *Question 2 & 3*: enablers 1.4, 1.5, 2.1, 2.4, 2.6, 3.1, and 3.3. Also in the National Preventative Health Strategy, there are clear policy achievements and targets outlined in the sections: *Improving access to and the consumption of a healthy diet, Partnership and community engagement key Learnings* and *Commercial determinants*. The CSIRO may also find thoroughly researched answers to *Questions 2 & 3* by consulting the Food Policy Index's 2022 10 Priority policy recommendations for the Australian Federal Government (2022-2025).

Recommendations:

- Improved food and nutrition monitoring.
  - Regular food insecurity surveys. Using the 18-point USDA Household food security survey module.
  - Surveillance of water security.
- Research into mapping the power dynamics in our food system.
- Create, fund, and implement a National Food and Nutrition Strategy.
- Review the FSANZ Act. Ensure it prioritises long-term health and can effectively create practical measures without industry pressure, such as improved labelling on the nutrition information panel.

- Act on the recommendations highlighted in the Food Policy Index, the National Preventative Health, and National Obesity Strategies.
- Reduce the role of industry in food and nutrition policy making and increase engagement with affected social and consumer groups.

Focus area 2: Reducing waste and improving circularity

Question 5. How can industry, government and communities work together to reduce waste and improve circularity?

Food loss and waste policy is often discussed and dealt with alongside food insecurity. Food rescue should be seen as a last resort, and a short-term approach to food insecurity. More sustainable and self-determining solutions are structural based, such as secure employment, housing, adequate salaries, and benefits. If and when food rescue is used in a food relief model; best practice involves a dignified, nutritious and equitable provision of food, as outlined in a recent policy brief by leading academics in this field (Responding to food relief needs, Australian Institute of Family Studies).

Focus area 3: Reducing greenhouse gas emissions

Question 11. Are there any other R&D priorities that should be addressed to ensure Australian food systems can reduce emissions? Which priorities are the most urgent?

We appreciate the development of new technologies and processes to reduce greenhouse gas emissions, however, they should not act as a distraction to the improved processes we already know will be effective.

The R&D we have to date indicates that to reduce greenhouse gas output in the food system, we need to reduce the production of ultra-processed foods, reduce the overall quantity of food produced, emphasise greater intake of healthy plant foods, and lower production and consumption of some animal-based foods.[4]

Food systems cannot be separated from nutrition. A diet consistent with the Australian Dietary Guidelines has a 42% lower carbon footprint than the current average Australian diet.[5] Lower production and less ultra-processed foods means healthier Australians and lower greenhouse gas emissions. There cannot be a genuine and long-term reduction in the food system's greenhouse gas outputs without shifting the food environment.

R&D already completed in this area includes:

- Towards healthier and more sustainable diets in the Australian context: comparison of current diets with the Australian Dietary Guidelines and the EAT-Lancet Planetary Health Diet
- Diets within Environmental Limits: The Climate Impact of Current and Recommended Australian Diets
- IPCC Food System section

Recommendations:

- Engage with the World Health Organisation Initiative on Climate Action and Nutrition (WHO I-CAN), an initiative which fosters collaboration to address the nexus of climate change and nutrition
- Revision of Australian Dietary Guidelines that focus much more on healthy and environmentally sustainable foods.
- Create policy based on the fact that less greenhouse gases will be produced if the food system is conducive to healthier dietary patterns.

PHAA appreciates the opportunity to provide our feedback on the Roadmap. To reiterate, we recommend greater consultation with food and nutrition stakeholders, reduction in the supplier-induced demand for ultra-processed and other unhealthy products and recognition that food waste is not the solution to food insecurity. For Australia to have a less polluting food system, then what and how much we grow and farm needs direction from nutrition and climate stakeholders.

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

Yours Sincerely,

Terry Slevin
Chief Executive Officer
Public Health Association of Australia

Damian Maganja
Food and Nutrition Special Interest Group Co-Convenor
Public Health Association of Australia

Bronwyn Ashton
Food and Nutrition Special Interest Group Co-Convenor
Public Health Association of Australia

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