



**Public Health Association**  
AUSTRALIA

## **Public Health Association of Australia submission on the ACT Draft Preventive Health Action Plan 2023-2025**

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## Preamble

### The Public Health Association of Australia

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.

The PHAA works to ensure that the public's health is improved through sustained and determined efforts of the Board, the National Office, the State and Territory Branches, the Special Interest Groups and members.

The efforts of the PHAA are enhanced by our vision for a healthy Australia and by engaging with like-minded stakeholders in order to build coalitions of interest that influence public opinion, the media, political parties and governments.

Health is a human right, a vital resource for everyday life, and key factor in sustainability. Health equity and inequity do not exist in isolation from the conditions that underpin people's health. The health status of all people is impacted by the social, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the unfair and unjust effects of conditions of living that cause poor health and disease. These determinants underpin the strategic direction of the Association.

All members of the Association are committed to better health outcomes based on these principles.

### Vision for a healthy population

A healthy region, a healthy nation, healthy people: living in an equitable society underpinned by a well-functioning ecosystem and a healthy environment, improving and promoting health for all.

The reduction of social and health inequities should be an over-arching goal of national policy and recognised as a key measure of our progress as a society. All public health activities and related government policy should be directed towards reducing social and health inequity nationally and, where possible, internationally.

### Mission for the Public Health Association of Australia

As the leading national peak body for public health representation and advocacy, to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.



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## Introduction

PHAA welcomes the opportunity to provide input to the ACT Government's consultation draft on the ACT Draft Preventive Health Action Plan 2023-2025. We support the overall direction and intent of the discussion paper and would like to submit feedback aimed to strengthen the final version.

Effective health promotion and illness prevention interventions have been shown to improve health outcomes in both the short and long term.<sup>1</sup> Additionally, investment in health promotion and illness prevention interventions is highly cost-saving,<sup>2</sup> cost effective and beneficial to the economy.<sup>3</sup>

Health and wellbeing can be impacted by factors including inequity, socio-economic, cultural, commercial, political, ecological, working and environmental conditions.<sup>4,5</sup> Early childhood development, social and community networks, psychosocial factors, access to quality health care programs and services and biomedical factors also impact on the health of individuals and populations.<sup>5</sup> Therefore, truly effective prevention policy should be holistic and should aim to address inequities.

To address these "upstream" factors and their subsequent "downstream" outcomes, creating, funding and implementing a Preventive Health Action Plan is a strong start. PHAA encourages the ACT Action Plan to be guided by the recommendations presented in the National Preventative Health Strategy. In particular, the ACT should commit a minimum 5% of all health spending to primary and secondary prevention.

## PHAA Response to the ACT Draft Action Plan

### Supporting families and children

**Objective:** *"Families are supported to optimise the healthy development of their children in the first 1000 days"*

**Action:** *"Deliver earlier and better supports for children and families during the first 1000 day period and increase awareness about the importance of the first 1000 days for child development"*

PHAA is encouraged to see emphasis on supporting children and families in the early years of a child's development. The supports required for effective early years are multifaceted. Therefore, a holistic approach should be used to ensure the various needs of a child's development are met, both through direct involvement of the child and through supporting children's families. We would strongly suggest the final Action Plan to use measurable goals for this and the other sections, to ensure progress is tracked.

**PHAA recommends that the Act government create programmes in the following:**

- **Adequate nutrition:**
  - Without access to healthy foods, children suffer long-term impacts on their physical, cognitive, and emotional development, limiting ability to flourish in education and reach their full potential.<sup>6,7</sup>
- **Clothing, personal care and hygiene:**
  - Nappies, soap, and oral care products are necessary for hygiene, health and social reasons,<sup>6,7</sup> as well as situation-appropriate clothing, which can be protective against environmental conditions (e.g., sun safety) and enable children to engage in essential activities (e.g., school).<sup>6,8</sup>
- **Living environments:**
  - Secure, stable, and quality housing free from overcrowding, extreme temperatures and with access to basic amenities is imperative to protect children from disease and build a stable support network.<sup>6</sup>

- **Safety:**
  - The greatest risks faced by children are at home in the form of abuse or neglect by parents and carers, with children in out-of-home care particularly vulnerable.<sup>9</sup> Adverse experiences in early childhood increases the probability of poor health and wellbeing later in life.<sup>10</sup>
- **Water safety:**
  - Swimming lessons are essential in Australia, the country with the world's largest number of pools per capita.<sup>11</sup> Children under five are most at risk of drowning, with an average of 23 deaths and 183 hospitalisations annually across Australia.<sup>12</sup>

## Enable active living

**Objective:** *“More adults and children using active modes of transport”*

**Action:** *“Promote active travel through safer walking and cycling infrastructure, a better connected and maintained network, making active travel and bicycle parking easy and working with communities to support behaviour change”*

The health benefits of regular physical activity are immense: from weight, blood pressure, and blood lipid profile control; to promoting mental well-being and better cognition; to improving strength, fitness, coordination, and movement skills; and to enhancing functional capacity and independence.<sup>13-15</sup>

Adults aged between 18-64 should accumulate 150-300 minutes of moderate to vigorous intensity physical activity per week.<sup>16</sup> This goal can become more achievable for people by investing in active transport. Making active transport an easy, convenient and pleasant option enables people to make physical activity part of their everyday routine.<sup>17-19</sup> Investing in active transport is investing in the health of Canberrans, promoting individual and community health and wellbeing, and reducing the burden caused by physical inactivity to the health system.

**PHAA recommends the following actions:**

- Quality and safe infrastructure for using public transport, walking and cycling, workplace facilities for bike storage and showering, and shaded cycle parking.
- Encourage bike share schemes and normalisation of cycling and walking as ways of transport.
- Improve availability of urban green space.
- Ticketing to enable people to make multiple trips, in multiple directions on different transport modes, with ease. For more recommendations see [Low Emissions and Active Transport](#).

## Increasing healthy eating

**Objective:** *“Lower intakes of energy-dense, nutrient poor (discretionary) foods and drinks - Increased consumption of vegetables”*

**Action:** *“Implement evidence-based strategies to support healthier food and drink environments in the wider community” and “Implement evidence-based strategies that support a whole-school approach to creating and maintaining healthy food and drink environments in and around schools.”*

**Action:** *“Improve the availability and promotion of free drinking water in public places, sports facilities and food outlets.”*

**Action:** “Continue to implement and monitor ACT healthy food and drink marketing policies on public buses and light rail; and explore opportunities to limit unhealthy food and drink marketing and sponsorship in ACT Government facilities and community settings including junior sports”

**Action:** “Undertake collaborative research to establish the prevalence and profile of households at risk of food insecurity in the ACT”

Australia is experiencing an overweight and obesity epidemic, with two-thirds of all adults and one-quarter of children being considered obese or overweight.<sup>20-22</sup> So far, interventions to address this issue have not proved effective, as reflected in data that shows an increase in overweight and obesity since 2007.<sup>21</sup> Transitioning Australians onto healthier and more sustainable diets will take a multifaceted approach.

**PHAA recommends the following actions:**

- ACT Government must follow best evidence when defining “healthier food and drink”. In other states, an artificially sweetened drink is “healthier” than a full sugar drink. Neither are healthy.
- ACT Government to support National policy to reduce obesity, including a [health levy on sugary drinks](#), mandatory [health star rating](#), [added sugar labelling](#), labelling of baby and toddler foods.
- Ensure the availability of water fountains extends into low socioeconomic areas.
- Stronger wording for the action outcome than “Children are less exposed” to junk food marketing when participating in sports.
- ACT Government to ensure fields/courts and playgrounds are free from unhealthy advertising.
- Stronger wording for the action outcome than “ACT Government policies and contracts limit exposure to unhealthy food and drink marketing”. Unhealthy marketing should not be in Government policies and contracts.
- Ensure public spaces and events are free from all unhealthy marketing.
- ACT to utilise the gold standard [18 point United States Department of Agriculture Household Food Security Survey Module](#).
- ACT Government to consider implementing school lunches to ensure all children are receiving the nutrition required for learning.

## Reducing risky behaviours

**Objective:** “Fewer people drinking at risky levels”

**Action:** “Investigate options to address impacts of online alcohol orders and home delivery on health and wellbeing of Canberrans”

**Action:** “Support community and sports organisations to deliver health promotion programs and initiatives that prevent and reduce harms from alcohol”

Alcohol is responsible for a substantial burden of death, disease and injury in Australia, affecting not only the drinkers themselves, but also children, families and the broader community.<sup>23</sup> The risk of harm to health from alcohol increases the more a person drinks.<sup>24</sup>

With the advent of online sale and delivery of alcohol, the ability to gain unfettered access to alcohol is greater than ever. A recent survey demonstrated that if rapid delivery of alcohol had not been available, respondents admit they would not have had any further alcoholic beverages.<sup>25</sup> Regulations must be in place to decrease the risk of alcohol exposure to children and the risk of “people drinking at risky levels”.

**PHAA recommends the following actions:**

- Introduce a specific licence category for online sales and delivery.

- Online alcohol purchases to require age verification at point of sale, i.e., AusPost Keypass ID check.
- Mandatory rotating health warning statements required for all websites selling alcohol products.
- Ban exploitative alcohol marketing and payment methods, including incentivising bulk purchasing alcohol, buy-now-pay-later schemes, push notifications, direct prompts, or 'buy-now' buttons.
- No alcohol delivery should be left unattended, and all deliveries should require age verification, as well as intoxication assessment at time of delivery. Non-deliveries should be reported with details.
- Delivery staff need appropriate RSA training and additional support to safely comply with the law.
- No delivery between 10pm and 10am any day, regardless of when the order was placed.
- Introduce a delay of two hours between purchase and delivery of alcohol.
- Prescribe test purchasing for unlawful delivery and provision of alcohol and establish offences.
- ACT Government should consider creating community-based alcohol harm reduction programs with the community and local sports organisations in a co-design format.

**Objective:** *“Minimise e-cigarette use in non-smokers, particularly adolescents and young adults”*

**Action:** *“Advocate for stronger national regulation of e-cigarette products and review ACT legislation to ensure current arrangements are contributing to minimising the harm caused by e-cigarettes”*

It is the right thing to do to ensure that people in the ACT, particularly children and people who are non-smokers, are protected from nicotine addiction and other harms associated with vaping and tobacco products. Action on vaping is supported by community, with 87% of Australians wanting to see young generations protected from nicotine addiction.<sup>26</sup> Vapes are getting Australian youths hooked on nicotine through targeted social media advertisements and enticing flavours like “candy floss”.<sup>27</sup> Vape use has doubled among 14 to 17-year-olds and quadrupled among 25 to 29-year-olds between 2016 and 2019.<sup>27</sup>

**PHAA recommends the following actions:**

- Introduce amended state legislation to explicitly prohibit the sale and supply of non-prescription e-cigarettes, components, and liquids irrespective of whether they contain nicotine.
- Prohibit advertising, promotion and sponsorship in relation to e-cigarettes, components and liquids.
- Increase resourcing for compliance and enforcement measures to deter non-pharmacy retailers that unlawfully sell e-cigarettes.
- Timely speed of implementation to drive down recreational vaping and avoid retailer stockpiling.
- Working with other jurisdictions to put in place strong regulations covering designated outdoor smoking/vaping areas, eliminate vending machines on licenced premises and prevent the emergence of a domestic manufacturing capability.
- Ongoing comprehensive monitoring and reporting to understand the impact of policy changes on smoking and vaping behaviours.

## Promoting healthy ageing

**Objective:** *“To support positive ageing, more adults engaging in healthy and protective lifestyle behaviours related to their physical and mental health”*

**Action:** “Engage and support quality research to build the evidence base for healthy ageing initiatives, with a focus on the secondary prevention of chronic disease”

PHAA fully supports researching, promoting and providing better access to secondary prevention strategies like screening. However, it would be a missed opportunity to focus on secondary prevention solely.

Secondary prevention is key to identifying issues that may be of concern to health and ensuring early intervention.<sup>28</sup> Primary prevention is the use of interventions to avoid health issues in the first place.<sup>28</sup> For example, smoking cessation, improving eating habits, vaccinations and regular exercise.<sup>28</sup> Primary prevention is often underfunded, under-researched and over-looked, despite its economic benefits.<sup>29</sup>

**PHAA recommends the following actions:**

- Support national implementation of the National Preventative Health Strategy and additionally, draw from the Strategy’s actions for the ACT Preventive Health Action Plan 2023-2025.
- By 2030 at least 5% of total ACT health spending will be dedicated to investments in preventive health.
- ACT Government to broaden scope and invest in both primary and secondary prevention research.

## Conclusion

PHAA supports the broad directions of the ACT Draft Preventive Health Action Plan 2023-2025. However, we are keen to ensure actions in line with this submission. We are particularly keen that the following points are highlighted:

- A commitment to at least 5% of the health budget be assigned to preventive health.
- Create measurable indicators and short-, medium- and long-term goals.
- Approach the early years with a holistic framework to give children the best start to life.
- Enable people to be physically active by ensuring safe, quality and pleasant environments.
- Utilise multiple different levers to increase healthy food availability and choices.
- Act now to regulate/eliminate the growing health threats of online alcohol delivery and vaping.
- Expand research investment to include both primary and secondary interventions.
- Support National level policy, like the implementation of the National Preventive Health Strategy.

The PHAA appreciates the opportunity to make this submission and the opportunity to ensure that more people in the ACT have the ability to live healthy and secure lives. Please do not hesitate to contact me should you require additional information or have any queries in relation to this submission.



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26/07/2023



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