



Department of Health and Aged Care  
Chronic Conditions Strategic Policy  
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To whom it may concern,

The **Public Health Association of Australia** (PHAA) welcomes the opportunity to provide input to the Refresh of the National Strategic Framework for Chronic Conditions.

### Introduction

The PHAA is recognised as the principal **not-for-profit 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. 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.

As the peak body for public health in Australia, PHAA advocates for policies and approaches that focus on prevention as the key to reducing chronic conditions and premature deaths. Our expertise is in preventive health, and as such with reference to this consultation, our focus is not on the treatment of chronic conditions, but on the actions that governments can take to prevent Australians developing chronic conditions in the first place.

This consultation is an opportunity to advance a strong agenda to tackle the determinants of health that continue to adversely influence the prevalence and incidence of chronic conditions. PHAA supports evidence-based interventions, non-stigmatising health service provision and equitable access for all.

### Framework Overview, Objectives and Target Populations

The PHAA Membership encompasses a broad range of public health professionals from diverse stakeholder groups, who align with the **Framework Vision for all Australians to live healthier lives through effective prevention and management of chronic conditions**. Chronic disease prevention is our core business.

The **enablers, objectives and determinants of health** identified by the Framework are important areas of focus that influence the **prevention, treatment and management of chronic conditions**, and we support the Framework aspiration for people with chronic conditions to have equitable access to quality health care.

There are currently several intersecting strategies and frameworks that aim to improve the lives of people with chronic conditions. The PHAA would support the proposed refreshed Framework to be a **mechanism for integration of these separate strategies** to align interventions and stakeholder collaboration under a united vision and strategic pathway.

For the Framework to achieve this vision, the PHAA recommend the following three key areas of focus:

- A chronic conditions prevention policy package
- Investment in prevention
- Leading role of the Australian Centre for Disease Control (ACDC)

### **A chronic conditions prevention policy package**

PHAA proposes that the Australian Government adopt a chronic conditions prevention policy package that aligns with the National Preventive Health Strategy (NPHS) 2021-2030<sup>1</sup>, the Primary Health Care 10-Year Plan 2022-2032<sup>2</sup>, the National Obesity Strategy (NOS) 2022-2032,<sup>3</sup> the National Aboriginal and Torres Strait Islander Health Plan 2021-2031<sup>4</sup>, the Strengthening Medicare Taskforce Report,<sup>5</sup> the Measuring What Matters Framework<sup>6</sup> and other relevant national and international policies, strategies and plans.

The causes of chronic conditions are broad, however common themes relate to the contexts in which people live, rather than to individual choices. For instance, unhealthy settings make it difficult to follow healthy eating and physical activity patterns by limiting the options that are available to people.<sup>7</sup> Addressing these complex health issues will require integration of different policies delivered as a package.<sup>8</sup> Without a comprehensive and coordinated approach, we will not see meaningful and sustained improvements in the prevention of chronic conditions.

Our proposed policy package includes the following items (in no particular order):

- Implement the NPHS, the NOS and allied frameworks as a priority.
- Implement policies to achieve physical activity targets outlined in the NPHS and NOS.
- Address structural failures within health funding systems.
- Eliminate food poverty, improve knowledge, access, and affordability of fresh food.
- Implement a food regulatory system that puts public health first, free from the influence of harmful industries.
- Comprehensive regulation to protect children from unhealthy food marketing.
- Develop and support a national chronic conditions prevention social marketing campaign.
- Access to health, care, wellbeing and mental health support services.
- Financial security and access to housing.
- Safe, peaceful and sustainable environment.
- Social connection, embracing diversity, belonging and culture.
- Access to education, digital literacy, employment opportunities and security.
- 20% health levy on sugary drinks manufacturers.
- Mandating and strengthened health star rating system across the packaged food supply.
- Mandatory added sugar labelling across the packaged food supply.
- Stronger regulation of infant and toddler foods and breastmilk substitutes.
- Mandatory reformulation targets to improve the composition of the packaged food supply.
- Development of a National Nutrition Strategy.

We acknowledge that the current Framework identified several of the determinants impacting chronic conditions in the Australian population and commend the aim to transition away from a traditional, disease-specific focus.

### **Role of the Australian Centre for Disease Control (ACDC)**

The establishment of the Australian Centre for Disease Control (ACDC) presents a clear opportunity to provide the high-level coordination required to implement these government strategies,<sup>7</sup> of which the proposed package of policies outlined in this submission would form part.

Assigning such a role to the ACDC would also be consistent with the Government's election commitments; the Australian Labor Party's 2022 election policy platform<sup>9</sup> states that:

“The [A]CDC will:

- ensure ongoing pandemic preparedness;
- lead the federal response to future infectious disease outbreaks; and
- work to prevent non-communicable (chronic) as well as communicable (infectious) diseases.

Prevention of chronic disease is central to the role of the ACDC.<sup>7</sup> It would be a serious failure of vision to establish an ACDC with infectious disease prevention as its sole focus. Indeed, Australians with chronic diseases were more likely to fall severely ill or die from COVID-19.<sup>10</sup> The majority of the burden of disease affecting Australians stems from chronic, but preventable, non-communicable diseases.<sup>11</sup>

Preventing chronic conditions, which encompass type 2 diabetes, heart disease, kidney disease, dementia, some cancers and many more,<sup>12</sup> would potentially improve health outcomes for the two-thirds of Australians who are obese or overweight.<sup>11</sup>

Given the significant proportion of Australians set to benefit from the prevention of chronic conditions, an evidence-based policy package as part of a long-term prevention campaign is ideally placed to be a core focus for the ACDC. The evidence and solutions relating to chronic conditions are clear, widely supported by health sector stakeholders, and stand ready to be implemented.

### Investment in prevention

Obesity and diabetes are just two major chronic conditions that cost the Australian economy an estimated \$8.6 billion and \$14.6 billion respectively.<sup>13,14</sup> There is evidence that demonstrates the cost benefits of policy interventions for prevention,<sup>15</sup> yet although mechanisms exist to assess the benefits and cost effectiveness of treatment options, there is no equivalent, clear, objective mechanism within the Australian Government to systematically assess benefit and cost effectiveness of preventive health interventions.

A prevention policy package is justifiable on financial grounds alone. Obesity is just one example of a key chronic condition that has direct health impacts on other chronic conditions such as diabetes. Policy interventions to prevent obesity are cost effective,<sup>15</sup> typically ranging between \$15-170 million, with costs concentrated in the initial three years of implementation, and benefits lasting over much longer periods.<sup>15</sup> At present, around two thirds of Australians are obese or overweight.<sup>11</sup> If that rate was to improve, the savings to governments and the population, through reduced treatment costs and productivity losses, would be immense.

The Organisation for Economic Co-operation and Development (OECD) reports that obesity prevention packages in Australia would be highly cost effective, providing an overall return on investment of about \$4 for every \$1 spent between 2020 and 2050, saving \$57 million in health costs per year.<sup>8</sup> Adopting the proposed chronic conditions prevention policy package to improve health outcomes would also improve Australia’s overall economic vitality by reducing workforce absenteeism and strengthening overall productivity.

This submission deliberately focuses on initiatives for the prevention of chronic conditions. We acknowledge that resources will continue to be required for management of existing chronic conditions across the Australian population, however, it is vital to slow and reverse the current increasing trend in Australia to protect the health of future generations and reduce the increasing economic burden.

### Conclusion

PHAA supports this public consultation, with the aim for a robust updated Framework that focuses on the following key priorities:

- Adoption of a chronic conditions prevention policy package.

- Establishment of the ACDC with non-communicable disease prevention as a founding and permanent focus alongside communicable disease prevention.
- Implementation of the chronic conditions prevention policy package as a key initial remit of the ACDC.
- Investment in prevention.
- For the Australian Government to establish a rigorous, evidence-based mechanism for evaluating the health and economic benefits of proposals for preventive programs across all sectors.

Please do not hesitate to contact us 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



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