Horizon scan to support the System Strategic Direction for 2023-2026

Response to consultation
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Recipient

Australian Government - Department of Health and Aged Care

Dietitians Australia contact

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About Dietitians Australia

Dietitians Australia is the national association of the dietetic profession with over 8500 members, and branches in each state and territory. Dietitians Australia is the leading voice in nutrition and dietetics and advocates for food and nutrition for healthier people and healthier communities.

The Accredited Practising Dietitian (APD) program provides an assurance of safety and quality and is the foundation of self-regulation of the dietetic profession in Australia. Accredited Practising Dietitians have an important role in the food system to support consumers in making healthy food choices and companies with product formulation, consumer education and compliance.

Recommendations

1. A safe, affordable, and nutritious food supply to ensure the health and well-being of all Australians must be the number one priority of the strategy. The current document does not sufficiently identify public health as a core component of the strategy, and in particular long-term diet-related chronic diseases.

2. The title of the megatrend: *Forever young: Ageing population, high chronic disease & spiraling health costs – while the global population is growing, people are also living longer, resulting in ageing population structures and high morbidity* requires revision to reflect the current state of play with the oversupply and overconsumption of unhealthy food, leading to a greater burden of disease, higher health care costs, and lower workforce productivity, as a result of an increasing unhealthy food environment.

3. Megatrends - unhealthy food environment and the rise of diet-related chronic diseases should be included as a standalone megatrend.

4. How the regulatory system influences public health outcomes should be included in the document.

5. Building a robust workforce, including dietitians is a requirement, which should have a greater focus.

Discussion

Are the trends, issues, risks, and opportunities affecting the broader food system accurately captured in the Horizon Scan?

No.

Despite the importance of nutrition for health and well-being – globally, unhealthy eating patterns are now responsible for more preventable deaths than any other risk factor, including tobacco.[1]

In Australia, 27,500 people die a preventable death each year from an unhealthy diet[2] and many more have their quality of life impacted due to overweight and obesity, and chronic diseases including, cardiovascular disease, diabetes, and cancers.[3]

Dietitians Australia has significant concerns with the megatrend: *Forever young: Ageing population, high chronic disease & spiraling health costs – while the global population is growing, people are also living longer, resulting in ageing population structures and high morbidity.*

Many of the health problems encountered in adulthood stem from experiences early in life. The major chronic diseases including, cardiovascular diseases are often associated with older age groups, but the evidence suggests that they affect people of all ages.[4]

This title requires revision to reflect the current state of play, which is the oversupply and overconsumption of unhealthy food, leading to a greater burden of disease, higher health care costs, and lower workforce productivity, as a result of an increasing unhealthy food environment.

Overall, the draft document does not sufficiently identify public health as a core component of the strategy, in particular diet-related chronic disease. In turn, it does not give sufficient focus to the key driver of these issues, poor diets, and the unhealthy food environment.

While these issues are touched upon, they are scattered throughout the different megatrends and presented as issues that sit alongside all others as part of broad global trends that are impacting the food system externally. This is inadequate to accurately convey the priority that these issues must be given within the food regulatory system and within any revised strategic direction.

The draft document does not adequately represent the role of the food system, in particular the processed food industry, in driving unhealthy food consumption and in creating unhealthy food environments.

As the primary objective of the food regulatory system is to protect public health, including long-term public health, this must sit at the forefront of any new strategic plan.

This must be considered together with key issues of environmental sustainability and equity to guide strong government action over the next strategic planning cycle.

We recommend the inclusion of the following megatrends within the document:

● The unhealthy food environment. This should link to issues relating to the rise of the unhealthy food supply, the promotion of unhealthy food, including food labelling, and issues with the availability and accessibility of healthy food. The policies and other measures to addresses these issues, must be government-led, enforced, and monitored. Voluntary mechanisms are not effective.

● The rising diet-related chronic disease. This should include a discussion on the burden of disease linked to poor diet, overweight and obesity and other diet-linked factors. It should address the rising healthcare and other costs associated with this, inequities, and the impacts on different population groups, including the ageing population.

In addition, a fundamental issue not addressed by this draft document is that the food regulatory system is not designed to prioritize public health above the food industry's interests and that it ensures policy and regulation is designed without inappropriate influence from the food industry.

The draft document discusses regulatory pressures in the context of the food industry, but there is no discussion on how the regulatory system influences public health outcomes. These issues are part of broader discussions on reforms to the food regulatory system, however at this stage it is not known how the reforms will address these issues and make changes to better protect and promote public health. This should be incorporated into this document.

The food system should be underpinned by a robust and well-trained workforce, including Accredited Practising Dietitians who have an important role in the food system to support consumers in making healthy food choices and the food manufacturing industry with product formulation, consumer education and compliance.

References

1. GBD 2017 Diet Collaborators. Health effects of dietary risks in 195 countries, 1990-2017: A systematic analysis for the Global Burden of Disease Study 2017. The Lancet. 2019; 393:1958-72

2. Australian Institute of Health and Welfare 2018. Australia's health 2018. Australia's health series no. 16. AUS 221. Canberra: AIHW

3. Australian Institute of Health and Welfare 2019. Poor diet., AIHW, Australian Government, 14 December 2021

4. Mikkelsen B, Williams J, Rakovac I, Wickramasinghe K, Hennis A, Shin H et al. Life course approach to prevention and control of non-communicable diseases BMJ 2019; 364 :l257 doi:10.1136/bmj.l257Appendix is auto-numbered and starts a new page