16 May 2018

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The Australian Food and Grocery Council (AFGC) welcomes the opportunity to make a public submission to the WHO (World Health Organisation) Independent High-level Commission on Non-communicable Diseases (HLC) draft First Report.

AFGC is a national organisation representing food and grocery manufacturers in Australia. Its membership comprises large multinational corporations as well as small to medium size Australian food businesses and covers around 75% of the domestic market, with many companies also exporting to countries around the world. A priority of the AFGC members collectively, as well as at an individual company level, is to assist Australians to choose healthy diets through the products they manufacture and market. It is in this context that the AFGC makes this submission to the consultation on the report to WHO Independent High-level Commission on NCDs ("the Report").

The Australian food processing sector recognises the global burden of NCDs and the need for innovative recommendations on how countries can accelerate progress towards the SDG targets in general and SDG target 3.4 in particular.

The AFGC supports Recommendation 1 with a particular endorsement for recommendation 1 (a) 2): Reducing sodium and eliminating artificial transfat. AFGC companies have been working to reduce sodium in their products through key initiatives involving government, industry and public health groups through the Australian Government’s Food and Health Dialogue and Healthy Food Partnership.

The AFGC also notes that the Australian food processing sector is a global leader in eliminating transfats. Australians typically obtain around 0.6 percent of their daily kilojoules from transfats as assessed by Food Standards Australia and New Zealand. Of this, about half come from naturally occurring sources. This is well under the World Health Organization recommendation to consume less than 1 percent of daily kilojoules in the form of transfats.

AFGC strongly welcomes Recommendation 2: Increase engagement with the private sector. As the Draft HLC Report notes, “to influence health outcomes, stakeholders outside traditional health sectors must be brought together and engaged” (paragraph 36).

AFGC welcomes the Commission’s consideration that “a fresh working relationship must be established with the food, non-alcoholic beverage, restaurant, technology and media industries, with the aim that all countries benefit from public-private partnerships that promote health and behaviour change” (paragraph 38).

The AFGC notes and welcomes the Report’s recognition of the importance of public/private partnerships in the pursuit of public health goals (para. 38, page 11). This, indeed, has been the experience in Australia which is fortunate enough to have had successive Governments at Federal and State and territory level realising the substantial leverage of resources which is possible through engaging in partnerships with the private sector. As well as being better able to manage practicalities of initiatives within the different sectors in the case of diet-related
NCDs, businesses in the food sector have the closest direct relationships with consumers through their day to day food and diet choices.

Continuing on this theme the AFGC supports the primary theme of Recommendation 2 which reflects the view that the private sector does have a role helping Governments to attain their public health objectives. A spectrum of regulatory measures is already in use in Australia from full regulation, to co-regulation and self-regulation with each playing important and complementary functions. Indeed, a fundamental policy principle established by the Governments in Australia has been that regulatory options to achieve policy objectives should include self-regulation as this frequently enables a higher bar to be set for outcomes, with outcomes achieved more cost-effectively for Government and indeed the wider community.

This is consistent with the Australian Government’s National Strategic Framework for Chronic Conditions which emphasises “new and innovative policies, strategies, actions and services’ to reduce the impact of chronic conditions.”

The National Strategic Framework for Chronic Conditions states, “Strong, cooperative and productive partnerships between governments at all levels, non-government organisations, the private sector, industry … are crucial to successfully preventing chronic conditions.”

The AFGC policy principles in working with Government and other stakeholders in Australia to reduce the incidence of overweight and obesity, and associated diet-related non-communicable diseases (NCDs) are in brief:

1. providing a choice of food products with a wide range of nutrient profiles in the marketplace reflects the wide variety of nutritional and health needs of individual consumers;
2. disseminating information to consumers, both on label and through the World Wide Web using modern information technologies, as required by regulation or as voluntary nutrition and health claims;
3. responsibly marketing of food products across all media platforms with specific voluntary restrictions regarding the advertising of food products to children;
4. supporting moderation of food product offerings in specific environments such as in school canteens recognising the need for supervision of choice for some vulnerable populations;
5. continuous innovation in the formulation and presentation of food product reflecting advances in nutritional science;
6. partnering with Government and other stakeholders allowing complementary capabilities and capacities to be brought to bear in meeting the preventive public health challenge of diet-related NCDs.

The AFGC and its members have a long and proud track record of initiatives and activities in the nutrition and health space working both independently and with the Governments in Australia. In brief, these have included:

1. In the 1990s, major vegetable oil refiners agreed to greatly reduce trans-fats from their products through a combination of changes in processing methods and alternative sourcing of oils. This has resulted in very low levels of trans-fats in the Australia diet (approx 0.6 percent of dietary energy which is well below the WHO recommended limit of 1 percent).
2. In 2005, the AFGC provided AUD$1million to the Australian Government to fund the Australian Children's Nutrition and Physical Activity Survey which was published in 2007. This provided an evidence base for subsequently Government preventive health policies.

3. In 2006, the AFGC introduced the Daily Intake Guide Front of Pack Labelling scheme which in subsequent years appeared on more than 7000 mainstream food products.

4. In 2009, the AFGC launched the voluntary Responsible Children's Marketing Initiative, which is a voluntary industry code moderating the nature of advertising to children consistent with of healthy diet and lifestyles.

5. In 2010, the AFGC along with public health organisations joined the Australian Government's Food and Health Dialogue in setting and implementing reformulation targets for a wide range of mainstream food categories.

6. From 2012 to 2014, the AFGC along with representatives of the consumer movement and prominent public health organisations worked with Government to develop a new Front of Pack labelling scheme comprising both interpretive and informative elements. The scheme, called the Health Star Rating was launched in mid-2014. It has been widely adopted by AFGC members and is now on over 10,000 products.

7. In 2015, the AFGC partnered again with the Australian Government and the public health sector to establish the Healthy Food Partnership. Targeting portion size, reformulation, out of home eating and consumer education the objective of the Partnership is to engage food businesses of all types and assist them to assist consumers to better diets, and so to better health.

Thank you again for the opportunity to make a submission to the WHO Independent High-level Commission on Non-communicable Diseases (HLC) draft First Report. I look forward to hearing about progress of the First Report.

Yours sincerely,

Tanya Barden

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Australian Food and Grocery Council