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## Aspirations for the food regulatory system

### AMA submission to the Food Regulation Standing Committee

#### Via Consultation Hub

<https://consultations.health.gov.au/preventive-health-policy-branch/aspirations-for-the-food-regulatory-system/>

The AMA welcomes the opportunity to submit comments to this consultation process, noting the opportunity it presents to broaden the way in which we conceive of and administer food regulation in Australia. As the nation's peak body for medical professionals, the AMA strongly advocates for a food regulatory system that enhances the health of all Australians, as well as ensuring that our food supply is safe, sustainable and affordable.

#### **1. What other key challenges and opportunities are facing the food system?**

The AMA broadly supports the challenges as they are laid out in the consultation paper. We note the importance of acknowledging the broader challenges that can impact on food supply and population health, such as climate change and equity and access to appropriate foods for disadvantaged groups.

We are particularly concerned with the impacts of processed foods and foods that are high in sugar and sodium with little nutritional value on public health. The AMA's view is that Australia's food regulatory system has a key role to play in ensuring that we do not cause harm through the consumption of an unhealthy diet. Our key aspiration is that this reform process consider ways in which we can foster good diet through food regulation.

#### **2. Do you agree that the focus of reforms should be on ensuring the system is set up to support interface management across regulatory systems, enables collaborative risk assessment and triage of issues and provides a range of (regulatory and non-regulatory) tools to support the system's objectives and empower consumers and industry?**

The AMA supports the need for collaboration between regulatory systems and appreciates the important role of non-regulatory approaches in addressing public health issues. Of course, regulations should be proportionate to risk and be evidence-based and effective. However, the AMA is somewhat concerned about the language used in this section of the consultation paper

to discuss the need for regulatory responses. Addressing diet-related chronic health risks such as diabetes, obesity and cardiovascular disease is a complex policy process that requires a multi-faceted response, which necessarily includes regulation (sometimes from multiple regulatory systems). There is no one “most efficient and effective way to promote public health” – there are a range of important interventions, both regulatory and non-regulatory, that need to be implemented to ensure Australians are informed and have equitable access to safe and healthy foods. Assessing policy responses to a public health issue should not be a zero-sum game in which only a single intervention is deemed necessary.

The AMA would like to see Australia’s food regulation system also focus on how to embed improved long-term health more explicitly in the objectives and functioning of the system. While “supporting public health by promoting healthy food choices, maintaining and advancing the nutritional qualities of food” is noted as an objective in the Overarching Strategic Statement, the AMA considers that in practice, preventing acute health risks is the central focus of the regulatory system. Considering that dietary risks (comprising a range of nutritional indicators) are responsible for [7.3% of the total disease burden](#) in Australia, the impact of food consumption beyond its immediate-term effects should be just as central to food regulation. For example, the Health Star Rating system, which is a key method of indicating nutritional value information to consumers, is voluntary and present [only on one third](#) of eligible products, and consumers still lack clear information sources about how much added sugar is included in food products. FSANZ’s Food Safety Standards [aim primarily to](#) “lower the incidence of food-borne illness”, and include little consideration of the long-term health and nutritional implications of food. The AMA suggests the current food regulatory framework could be recast to include the adverse health impacts of a poor diet as a matter of consumer safety.

### **3. Is there anything missing from these aspirations and high-level actions?**

The AMA supports the involvement of stakeholders in identifying priorities and developing integrated strategies for the food regulation system. The AMA appreciates the role of the food industry in this process, while acknowledging that public health must be the central and fundamental goal of the food regulatory system. The commercial interests of food producers, manufacturers and companies need to be carefully monitored and mitigated as part of their involvement in the process of setting any food regulation.

### **4. Are there any aspirations or high-level actions that you disagree with and why?**

Not specifically.

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