

20 January 2021

Food Regulation Standing Committee
Australia and New Zealand Ministerial Forum on Food Regulation
Submitted online

Aspirations for the food regulatory system

Dear Sir / Madam

The New Zealand Medical Association (NZMA) wishes to provide feedback on the above consultation. The NZMA is New Zealand's largest medical organisation, with about 5,000 members from all areas of medicine. The NZMA aims to provide leadership of the medical profession, and to promote professional unity and values, and the health of all New Zealanders. We recognise the principles of te Tiriti o Waitangi and the special obligations to Māori, particularly to ensure equity and active protection. Current disparities in health outcomes between Māori and non-Māori are unacceptable. The NZMA is committed to advocating for policies in health and the social and wider determinants of health that urgently address these disparities and contribute to equity of health outcomes. Our submission has been informed by feedback from our Board, Advisory Councils and members.

We welcome the opportunity to provide feedback on the aspirations for the food regulatory system and some associated high-level actions. We note that this consultation relates to Stage 1 of the review of the intergovernmental Food Regulation Agreement, and that the outcomes of stakeholder consultation will inform decisions of the Ministerial Forum on Food Regulation and drive the ongoing continuous improvement of the food regulatory system. Our responses to the consultation questions have been submitted online via the consultation hub as requested. They are duplicated below for the benefit of our members.

Consultation Questions

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

While the consultation document identifies a number of key challenges and opportunities facing the broader food system, we believe there is a need to more explicitly highlight the inextricable links between food systems, human health and environmental sustainability. For example, transitions to unhealthy diets are not only increasing the burden of obesity and diet-related noncommunicable diseases, but are also contributing to environmental degradation. Food production is the largest cause of global environmental change, responsible for up to 30% of global greenhouse-gas emissions and 70% of freshwater use. We direct the Standing Committee to the EAT-Lancet Commission on healthy diets from sustainable food systems which elaborates

on these links and presents an integrated framework providing quantitative targets for healthy diets and sustainable food production to ensure a broad set of human health and environmental sustainability goals are achieved.¹

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?

Yes. The food regulatory system must extend beyond just reducing acute food safety risks to address broader public health objectives such as tackling obesity and supporting environmental sustainability. Conflicts of interest with the food industry need to be explicitly identified and measures developed to mitigate these conflicts so that the primary objective is the protection of the health (and the determinants of health) of consumers and populations.

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

Yes. Consideration of antimicrobial resistance (AMR) is missing from these aspirations and high-level actions and needs to be added given the important role that food production has with respect to the development of AMR. A One Health approach to AMR is necessary, linking the human health, veterinary and agriculture sectors. We also believe that the aspirations and high-level actions should specifically mention climate change and include reducing carbon emissions. Given the wide-ranging impacts of the food system on the environment, and the linkages between food systems, human health and the environment, we suggest it would be useful to include the concept of planetary health. This would ensure that issues such as the use of palm oil feed for animals are identified and opposed. Also missing from these aspirations and high-level actions are the voices of Māori and Pasifika. These voices need to be heard and included.

Other issues that are useful to consider include the following:

- the food regulatory system should support the use of fiscal instruments as a means of influencing food consumption (eg, tax on sugar sweetened beverages,² removing GST for healthy fresh fruit and vegetables)
- the purchase of locally grown food and produce should be encouraged to reduce food mile costs/carbon footprints
- food labelling should include nutritional value and the amounts of saturated fats, sugar, salt, etc.
- folic acid fortification of bread should be made mandatory
- trade considerations, including a desire to reduce unnecessary barriers to trade, should not restrict the government's ability to legislate, regulate or make policy for issues that could affect health, including future unanticipated ones.³ This means taking an approach that draws on the precautionary principle.

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

No.

We hope our feedback is helpful and look forward to continued engagement on the future of the food regulatory system.

¹ Willett W, et al. Food in the Anthropocene: the EAT-Lancet Commission on healthy diets from sustainable food systems. *Lancet*. 2019 Feb 2;393(10170):447-492. Available from [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(18\)31788-4/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(18)31788-4/fulltext)

² Taxes on sugar-sweetened beverages. NZMA Position Statement. December 2016. Available from www.shorturl.at/aosF7

³ Health and international agreements on trade, investment and services. NZMA Position Statement. February 2017. Available from www.shorturl.at/svFTZ

Yours sincerely

A handwritten signature in blue ink that reads "K. Baddock". The signature is written in a cursive style with a large, looping initial "K" and a trailing flourish.

Dr Kate Baddock
NZMA Chair