



21 January 2021

**Submission to the Food Regulation Standing Committee:
Aspirations for the Food Regulatory System**

The New Zealand College of Public Health Medicine thanks the Food Regulation Standing Committee for the opportunity to make a submission on [Aspirations for the Food Regulatory System](#).

The New Zealand College of Public Health Medicine (the College) is the professional body representing the medical specialty of public health medicine in New Zealand. We have 205 active members, including 185 fully qualified Specialists, with the majority of the remainder being advanced trainees in the medical specialty of public health medicine.

Public Health Medicine is the branch of medicine concerned with the assessment of population health and health care needs, the development of policy and strategy, health promotion, the control and prevention of disease, and the organisation of services. The College partners to achieve health gain and equity for our population, eliminating inequities across socioeconomic and ethnic groups, and promoting environments in which everyone can be healthy.

The food regulatory system plays a crucial role in putting food systems on track to support a healthy and sustainable future for our planet and its inhabitants. The College's position on opportunities and challenges for the food regulatory system is underpinned by several recent reports on the need for healthy, sustainable food systems.^{1,2,3,4} The College recognises malnutrition, obesity and diet-related non-communicable diseases (coronary heart disease, stroke and diabetes), and their confluence with sustainability/climate change, as significant public health challenges which need to be urgently addressed.⁵ We welcome this significant opportunity to transform the food regulatory system into a positive force that can generate the outcomes needed to deliver on essential societal goals: nutritional health, environmental restoration, food equity, reduced greenhouse emissions, and growing prosperity.⁶

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

The College agrees with the challenges facing the food system that are identified in the consultation document. We are particularly concerned about the health impacts of the current system, and the contribution of the current food system to climate change, which will also have implications for health.

The EAT-Lancet report identifies the food system as key driver behind global health problems.¹ Globally more than 820 million people remain undernourished, while it is projected that almost half the world's population will be overweight or obese by 2030. There is a steep increase in diet-related diseases such as type-2 diabetes and coronary heart disease, resulting not only in reduced quality of life for those affected, but also a large burden on economies due to rising healthcare costs and lost productivity.¹

Current increased agricultural activity is a threat to environmental sustainability. The environmental effects of the food system could increase by 50–90% in the absence of technological changes and dedicated mitigation measures, reaching levels that are beyond the planetary boundaries that define

a safe operating space for humanity.⁷ The food sector will need to adapt as Australia and New Zealand seeks to manage its greenhouse gas commitments. For methane emissions from agriculture and waste (over 40% of New Zealand's emissions) New Zealand has committed to targets of 24-47% percent reduction to below 2017 levels by 2050 and an interim target of 10% reduction by 2030.⁸

Against this background, key specific challenges and opportunities face the food regulatory system in the New Zealand context:

- a) the need to regulate food to address the environmental causes of childhood obesity
- b) the need to support sustainable healthy food systems through regulation and
- c) the need to ensure food safety through food regulation.

Food regulation for health: need to address the environmental causes of childhood obesity

The College recognises childhood obesity as a major public health challenge that must be urgently addressed.⁹ New Zealand has the second highest rates of child obesity in the OECD and 39 per cent of children are classified as overweight or obese.¹⁰ The Annual Update of Key Results 2019/2020 of the New Zealand Health Survey reported nearly one in ten children aged 2–14 years (9.4 percent) were obese. The prevalence of obesity among children impacts on the ability to achieve health equity, varying by ethnicity with 29.1 percent of Pacific and 13.2 percent of Māori children reported as obese. Children living in the most socioeconomically deprived areas are 2.7 times as likely to be obese as children living in the least deprived areas.¹¹

The College is of the view that food regulations should tackle Aotearoa's obesogenic environment. We support the use of the *Government Healthy Food Environment Policy Index* (Food-EPI) to monitor and benchmark food environments, and relevant government policies and private sector actions to help achieve national accountability and action within the food industry.^{12, 6}

We support the recommendations of the [Food-EPI 2020](#) report regarding Mandatory Health Star Ratings and Food Reformulation Targets. The report identifies that uptake of the Health Star Rating (HSR) displayed on front-of-pack of food products has been slow. An estimated 25% of eligible packaged foods and beverages displayed the HSR label in 2019 and these were selectively displayed on healthier products. The report strongly recommends that the HSR should be mandatory and considers that waiting another five years before a further decision is made about whether to make the system mandatory is far too long and unjustified.⁶

The College also supports the recommendations in the [Food-EPI 2020](#) that food reformulation of the composition of certain foods to be healthier can be an effective way to improve nutrition without requiring a behavioural change on the part of the consumer. We support the concept of a two-tier system for reducing added sugar (and sodium) in key food categories; setting mandatory maximum levels which will remove the products with the highest levels of added sugar (and sodium) in product categories and setting and monitoring targets for voluntary reductions in sales-weighted averages in key food groups to create a collective target. This aims to bring down the average for sugar (or sodium) in the category.⁶

Food regulation for sustainable, healthy food systems

In the New Zealand context, the agricultural sector is responsible for nearly half (48%) of greenhouse gas emissions¹³ and this is heavily influenced by current dietary preferences.⁵ Plant-based diets are

significantly less climate-polluting than animal-based foods (especially red and processed meats) and have significant co-benefits for nutritional health. The College supports a shift towards plant-based diets (and a major reduction in meat consumption).⁵

The College is of the view that the food regulatory system has a significant opportunity to champion plant-based diets and thereby support the growth of sustainable food systems. Consumption of plant-based products has grown rapidly in recent years. In Europe, plant-based meat sales increased 451% between 2013 and 2017¹⁴ and recent New Zealand research shows that one-in-three New Zealanders (34%) are now reducing their meat consumption or eating no meat at all; 31 percent of New Zealanders are Flexitarian or Meat-Reducers, and a further three percent of New Zealanders are Vegetarian or Vegan.¹⁵

The development and use of sustainability labelling has the potential to encourage a move towards sustainable, healthy food systems. Recently, an increasing number of labels have emerged that estimate the effect of a product on one or more environmental factors, such as carbon foot-printing as a marker of greenhouse gas emissions or climate change. Whilst we recognise that a major challenge with sustainability labelling of food products is the complexity of the sustainability concept itself, as well as the food system within which it operates, research indicates sustainability labelling can target small incremental changes in different levels and actors in the food system, within both individuals and organisations.¹⁶

Food regulation for food safety

Tackling AMR (Antimicrobial Resistance)

The College recognises the emerging and increasing speed of AMR (antimicrobial resistance) as a growing threat to public health, both globally and within New Zealand. We note the World Health Organization is urging all states to take immediate action in response to this increasing problem. We believe that antimicrobial stewardship should be a national public health priority and acknowledge that tackling AMR requires widespread commitment and leadership from human, animal and agricultural sectors in New Zealand, working together.^{12,17,18}

Growing evidence suggests that large volumes of antibiotics used in agriculture are in themselves an important contributing factor to AMR.¹⁷ We suggest that mandatory food labelling stating whether antibiotics were used during production would be a potentially useful regulatory approach. While largely untested to date, this approach accords with informed choice and could potentially help address AMR worldwide.

Preventing campylobacter

Public health experts have noted that New Zealand has a long-running Campylobacter infection epidemic, with contaminated fresh poultry the major source. Added to this problem is the recent rapid spread of antimicrobial resistance (AMR) in these Campylobacter infections from locally produced poultry. Contaminated poultry is estimated to cause than more than 30,000 cases of human Campylobacter infection each year in New Zealand. It is estimated that 30 of these will cause Guillain-Barré syndrome, and others will result in serious invasive illness and death. The economic cost to the country from Campylobacter-contaminated poultry runs to tens of millions of dollars.¹⁹

Given these health, economic and social costs, the College is of the view that the food safety regulator should be taking all reasonable steps to protect consumers. Key control measures have been identified including lowering the regulatory limits for Campylobacter permitted in fresh

poultry, freezing chicken before selling, warning labels that include consumer food safety warnings and cooking and handling instructions on all packaging of fresh poultry.¹⁹

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

The College supports the proposal that the objectives outlined in the Overarching Strategic Statement (OSS) be retained and reflected in a revised Food Regulation Agreement (FRA). Our view is that the food regulation system should be used to drive public health objectives, and that the system has a key role to play in reducing risks related to food, enabling consumers to make informed choices and supporting public health objectives. We do not believe that debates about whether or not specific strategies such as the Health Star Rating system are the 'most effective and efficient' way to achieve public health objectives are helpful: multiple strategies may be needed to address this complex issue. The regulator plays a key role in this and has a responsibility to ensure that consumers are well-informed in their choices.

We support moves to ensure the system is set up to support interface management between systems and to provide a range of tools to support the system's objectives and empower consumers and industry.

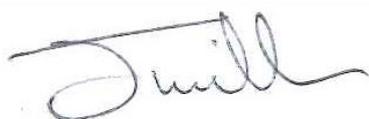
3. Is there anything missing from these aspirations and high-level actions?

The College agrees with the aspirations outlined in the document to strengthen strategic leadership of the system; reorient the system to focus on achieving shared objectives; expand the tools available to monitor compliance and respond to non-compliance; improve feedback loops to inform regulatory and non-regulatory approaches and responses; better involve stakeholders in identifying priorities; and develop integrated strategies and improve regulatory responsiveness.

The College welcomes this significant opportunity for a re-set of the agenda for food system regulation. We believe that it is necessary for the system to adopt approaches in food regulation that limit the influence of commercial interests in favour of essential population health and sustainability benefits for society. A health in all policies approach is required for this population determinant of health.

Thank you for the opportunity for the NZCPHM to submit on [Aspirations for the Food Regulatory System](#). We hope our feedback is helpful and are happy to provide further clarification on matter covered in this submission.

Sincerely,



Dr Jim Miller

President, NZCPHM

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