

# National Health Literacy Strategy Framework Consultation

**Response to consultation  
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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 the profession and the people and communities we serve.

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.

Dietitians Australia welcomes the opportunity to provide input into this consultation and looks forward to participating in the public consultation of the draft Strategy in 2023.

## Recommendations

Question 1: Does the Framework capture the important components? If not, please describe what else is needed?

Dietitians Australia recommends the inclusion of two additional core components.

1. Industry via the commercial marketing of products (unhealthy food and beverages, alcohol etc),<sup>1</sup> distortion of science (heated tobacco products),<sup>2</sup> and systematically targeting health professionals – whose recommendations are influential (formula milk companies),<sup>3</sup> impacts the health literacy of Australians and their health outcomes. There are several examples of negative commercial influence on health literacy, one of the most profound reported by the World Health Organization’s research “*How the marketing of formula milk influences out decision on infant feeding*”.<sup>3</sup>

There are also industries which promote and provide health literacy, this should also be captured and utilized as a tool for growing health literacy. For example, private health insurance programs supporting physical activity and well-being.<sup>4,5</sup>

The framework must identify industry as a “partner”, and clearly address the impact of industry on health literacy, how to mitigate negative and amplify positive influences within Aim 1 - systems, policies, and practices.

2. Digital ecosystem – as an enabler to better serve and improve health literacy and partner to mitigate data capture, brokering and content dissemination by partners with commercial interests. Including the digital ecosystem as a “partner”, and clearly addressing how to mitigate negative and amplify positive influences within Aims 2 and 3.

Question 2: Is the proposed vision appropriate for the National Health Literacy Strategy?

Dietitians Australia supports the proposed vision and calls for a costed implementation and evaluation plan with SMART targets and goals,<sup>6</sup> to be detailed in the forthcoming draft National Health Literacy Strategy.

Question 3: Are the key principles captured? If not, what is missing?

Dietitians Australia supports the key principles and highlights the need to include an additional principle: “multi-sector collaboration”. This would add recognition to the wider determinants of health, concretely link to both Aim 1 and the proposed section on leaders and partners and it aligns with the principles of the *National Preventive Health Strategy*.<sup>7</sup>

Question 4: Are the aims the right ones for achieving the vision of the National Health Literacy Strategy?

Dietitians Australia support the proposed Aims and commends the importance placed on evidence-based messaging and mitigating misinformation. As noted in response to question 1, industry and the digital ecosystem must be clearly addressed with in the Aims.

Question 5: Do you have any example actions that could be considered under each aim?

Aim 2:

- Health professionals and their associations adopt, publicise, and implement strong conflict-of-interest policies to impede corporate interests from influencing critical health guidance and training.
- Health information is available in a range of accessible formats such as Easy English, plain English, braille, large print and Auslan videos<sup>8</sup>

Question 6: Are the categories for the leaders and partners who will mobilise health literacy action appropriate?

Dietitians Australia recommends the inclusion of additional categories – industry and the digital ecosystem – see response to question 1.

Question 7: Please provide any other observations and advice that you have not had the opportunity to make on the Framework

Dietitians Australia recommends revision of the title of the proposed leaders and partners section. With the inclusion of industry, this should be renamed as partners.

## References

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6. Centers for Disease Control and Prevention - Develop SMART Objectives (2022). Available from: [Develop SMART Objectives \(cdc.gov\)](https://www.cdc.gov/develop-smart-objectives/)
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