

Australian Bureau of Statistics’ refresh of the principles underlying the assignment of a discretionary food flag to NNPAS food codes

Response to consultation

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Recipient

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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 food and nutrition for healthier people and healthier communities.

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.

This submission was prepared by members of the Dietitians Australia Food Regulatory and Policy Committee following the [Conflict of Interest Management Policy](#) and process approved by the Board of Dietitians Australia. Contributors include Dietitians Australia members with wide ranging expertise in areas including public health, food systems, food industry and academia.

Dietitians Australia welcomes the opportunity to provide input into this consultation.

Recommendations

Question 1: Do the refreshed principles and proposed wording changes address the issues raised and summarised above?

Dietitians Australia agree with the direction of the revised principles, and note the importance of further review of the principles upon publication of the new edition of the Australian Dietary Guidelines.

Question 2: Do you have any responses to the comments in Table 1 in relation to specific issues raised?

Dietitians Australia has provided additional responses within Table 1 below.

Question 3: Given the scope of the refresh, are there any other issues which are not covered above that would be considered in scope?

Dietitians Australia raises no other issues.

Question 4: Do you endorse the principles as drafted?

Dietitians Australia endorse the principles with the following amendments:

1. Suggest clarifying that fruit juice clarification includes 'fruit and vegetable juices' as five food group foods and 'other fruit or vegetable drinks' are to be classified as discretionary.
2. New cut-points for sugar and saturated fat should be considered and should be evidenced based. Suggest revising to a lower cut point such as the one used for the Healthy Food Partnership reformulation targets for breakfast cereal <22g/100g for breakfast cereal with dried fruit, and 20g/100g for breakfast cereal without dried fruit.
3. As there is no change in outcome between total fat and saturated fat, recommend maintaining the current position for saturated fat as this poses a greater public health risk than total fat. This is consistent with messaging throughout the Australian Dietary Guidelines.

4. Commercial pasta sauces (tomato-base) should be considered discretionary.
5. Commercial dips should be considered discretionary.
6. Commercial dressings should be considered discretionary.
7. Desserts high in added sugar and/or cream (saturated fat) should be classified as discretionary, e.g. cheesecakes and creme brulee. Custards and yoghurts should be considered five food group foods.
8. Mixed dishes should not be disaggregated and that this is a misinterpretation of the report.

Table 1: Proposed refreshed principles

Proposed 2023 NNPAS principles	Previous 2011-13 AHS User Guide principle (if different)	Comment
(1) Main general principles		
<p>Classification of foods as discretionary or when if they are specified as discretionary in the 2013 Australian Dietary Guidelines and supporting documents as discretionary, and suite of supporting publications, including:</p> <ul style="list-style-type: none"> - Australian Dietary Guidelines main document - Evidence review - Modelling document - Eat for Health website (eatforhealth.gov.au) content: - Guideline summaries - Educator guide - Posters and brochures 	<p>The main principle used to classify foods as discretionary is that they were specified or inferred in the 2013 Australian Dietary Guidelines and supporting documents as discretionary.</p>	<p>Change of language to 'specified' only, with list of all the resources from which a specification could come from. Eg coconut milk/cream is listed under 'extras' in the food modelling document but did not appear to be specified as discretionary/Five Food Group food in any other publications.</p> <p>Coconut milk/cream was flagged in the Sax Institute review as a discretionary food according to ADGs that was not flagged as such in the AHS 2011-13 food list.</p>
<p>Dietitians Australia support this change, however, query if this principle overrides principles below once there are updates made? As the guidelines and definition of discretionary foods list are updated, will the ABS principles be updated accordingly?</p>		
<p>All foods to be classified at the individual food code (8-digit) level.</p>	<p>For the most part foods were classified at the minor group level (i.e. 5-digit level) not as individual foods.</p> <p><i>Note:</i> In some cases, it was not possible to</p>	<p>There appears to be a consensus that coding at the individual food level (8-digit food code) will improve alignment with the 2013 ADGs.</p>

	classify foods as discretionary at the 5-digit code level. It was sometimes unclear as to how to apply the main principle to a sub-group that consisted of mixed foods. Consequently, some additional analysis was applied at the individual food code (8-digit) level.	
Dietitians Australia support coding at the individual food level.		
All fruit juices to be classified as non-discretionary; other juice drinks to be classified as discretionary	No change	
Dietitians Australia support no change, however, suggest adding clarity to include 'fruits and vegetable juices' for and 'other fruit or vegetable drinks' are to be classified as discretionary.		
All soft drinks to be classified as discretionary, including intense sweetened drinks	No change	
Dietitians Australia support no change.		
All confectionery to be classified as discretionary	No change	
Dietitians Australia support no change.		
2) Food fortification		
Fortification of the food does not alter whether food is to be classified as non-discretionary or discretionary	No change	
Dietitians Australia support no change.		
(3) Nutrient profile criteria		
The following additional criteria based on nutrient profiles to be used to help identify foods as non-discretionary or discretionary at the food code (8-digit) level. These criteria are based on cutoffs used in the	The following additional criteria based on nutrient profiles were used to help identify foods as non-discretionary or discretionary at the	Suggest using more definitive wording.

<p>modelling that supported the 2013 ADGs development.</p>	<p>food code (8-digit) level. These criteria were based on cut-offs used in the modelling that supported the 2013 ADGs development.</p>	
<p>Dietitians Australia no comment.</p>		
<p>For breakfast cereals, discretionary foods to be defined as those with >30 g total sugar per 100g or for breakfast cereals with added fruit >35 g total sugar/100g</p>	<p>No change</p>	<p>Issue of lack of evidence for selection of total sugar cut-offs raised by AFGC. Others support lowering of cut-offs for sugar.</p> <p>Out of scope for this review.</p> <p><i>Note: the higher total sugar cut-off point for breakfast cereals with dried fruit is intended to take the natural sugar content of this ingredient into account.</i></p>
<p>Dietitians Australia support a review of the cut-point, and recommend the current definition is too high and should be lowered. New cut-points should be evidence-based and aligned with other policies. For example: The Healthy Food Partnership reformulation targets for breakfast cereal is <22g/100g for breakfast cereal with dried fruit, and 20g/100g for breakfast cereal without dried fruit.</p>		
<p>For mixed dishes with cereal content (e.g. sandwiches, burgers, wraps, sushi, pizzas) discretionary foods to be defined as those with >10 g total fat per 100 g</p>	<p>For mixed dishes with cereal content (e.g. sandwiches, burgers, wraps, sushi, pizzas) discretionary foods are defined to be those with >5 g saturated fat per 100 g</p> <p><i>Note: comparison of the list of foods with > 10 g total fat per 100 g with a list of those > 5 g saturated fat per 100 g indicated no difference in the outcome of whether a food was classified as discretionary or not.</i></p>	<p>Change from saturated fat to total fat cut-off for consistency with the 2013 ADG modelling document.</p>

	<p>The > 5 g saturated fat per 100 g definition was already used in the AUSNUT food classification system and was retained for convenience as it gave equivalent results to using the > 10 g total fat per 100 g stated in the 2013 ADGs.</p>	
<p>Dietitians Australia recommend maintaining the current position, given saturated fat poses a greater public health risk than total fat. This is consistent with messaging throughout the Australian Dietary Guidelines.</p>		
<p>All milk-based drinks to be flagged as non-discretionary, including flavoured milks and those made up from dry powders such as hot chocolate powder with the exception of beverages with cream or ice cream added (eg commercial thickshakes, bubble tea that will be assigned a discretionary food flag)</p>	<p>All milk-based drinks to be flagged as non-discretionary, including flavoured milks and those made up from dry powders such as hot chocolate powder.</p>	<p>Minor change with additional wording proposed.</p> <p>Sax Institute review suggests commercial thick shakes should be discretionary (Lee et al, 2018)</p> <p>May be worth clarifying where the line actually is between ‘milk-based drinks’ and discretionary milk-type drinks as there are potential inconsistencies in both the old principles and AHS discretionary food flag list and proposed refreshed principles?</p> <p>For example, bubble tea, coffee beverages sold with added sugar, commercial thick shakes appear to be more likely to be considered a discretionary food by external data users – is this because they are partly water and/or have sugar, cream or ice cream added, and therefore have insufficient calcium/protein content to compare with plain milk? Whereas flavoured milk, milkshakes etc do have comparable calcium/protein content compared to unflavoured milk and are more likely to be considered non-discretionary. However often these latter drinks do contain added sugar.</p>

		Is there evidence to treat flavoured milk beverages with added sugar (e.g. hot chocolate made with milk, water and drinking chocolate powder) differently to non-flavoured milk beverages? Is there anything in the ADGs which might be useful to assist in making a distinction between certain types of milk-based beverages?
Dietitians Australia recommends milk-based drinks with cream or ice cream should be flagged as discretionary, given these additions are not five food group foods, and would outweigh the benefits of milk as a five food group food.		
Tea and coffee beverage products sold with added sugar to be flagged as discretionary	No change	Should tea and coffee beverages where sugar has been added at the point of consumption by an individual be linked records and considered a discretionary item in data analysis? <i>Note:</i> in this case added sugar will be coded separately from the tea/coffee beverage in the individual's dietary record.
Dietitians Australia support no change.		
All soup dry mixes to be flagged as discretionary due to their high sodium content/100g, noting the dry mix can be used in other dishes. Dry soup mix made up with water is non-discretionary as it has similar sodium content to other ready to eat soups. Soups prepared from dry mix or concentrate to also be flagged as discretionary	All soup dry mixes were flagged as discretionary due to their high sodium content/100g, noting the dry mix can be used in other dishes. Dry soup mix made up with water was non-discretionary as it had similar sodium content to other ready to eat soups.	"Prepared soups" are listed as discretionary in educator guide.
Dietitians Australia support soups prepared from dry mix or concentrate to also be flagged as discretionary.		
Possible assignment of discretionary food flag for other foods/food groups to be considered under the above principles - issues raised in feedback		

<p>All tomato-based pasta sauces to be considered non-discretionary</p>	<p>Homemade item flagged as non-discretionary and commercial item as discretionary</p>	<p>Issue raised by stakeholders as a potential inconsistency because the nutrient profiles for homemade and commercially made sauces are similar.</p>
<p>Dietitians Australia recommend commercial tomato-based sauces be considered discretionary, given the high levels of sodium.</p>		
<p>Dips made from ingredients from the five food groups and unsaturated oils to be considered non-discretionary.</p> <ul style="list-style-type: none"> - Guacamole - Hummus - Yoghurt or cream cheese dips - Beetroot or carrot dips - Bean and tomato dips (nachos style) - Pesto 	<p>Dips flagged at the 5-digit level as discretionary</p>	<p>Sax Institute review suggests homemade dips made from the five food groups are non-discretionary (Lee et al, 2018). Elsewhere in the Sax review, hummus is mentioned without specifying homemade or commercial items, just noting advice to limit salty varieties.</p> <p>Should all hummus (and other dips made from five food group ingredients) be considered non-discretionary i.e. both homemade and commercial?</p> <p>Note: Cream cheese dips, including those flavoured with ingredients like gherkin and bacon, are listed in the ADG modelling document for weight and nutrient profile (i.e. non-discretionary). Vegetable dips are listed for weight only. Pesto not listed.</p> <p>Dips made from discretionary foods and/or saturated fats or oils would still be flagged as discretionary, e.g. if made from sour cream.</p>
<p>Dietitians Australia recommend commercial dips made from the five food groups be considered discretionary, given the higher levels of sodium.</p>		
<p>Dressings and sauces made from unsaturated fats to be considered non-discretionary</p>	<p>Dressings and sauces flagged at the 5-digit level as discretionary</p>	<p>Sax Institute review suggests these dressings and sauces (eg unsaturated oil/vinegar dressings,</p>

		homemade mayonnaise) are non-discretionary (Lee et al, 2018).
<p>Dietitians Australia requires further information on which dressings/sauces are considered to be made from unsaturated fats. Is this all in the category including ranch, thousand island, and coleslaw dressings? Please clarify if this would mean only homemade mayonnaise is considered non-discretionary?</p> <p>Commercial dressings high in sodium, fat and sugar should be considered discretionary.</p>		
<p>Mixed dishes (those made from two or more ingredients and not directly matching one of the five food groups) to be broken down to their main ingredients if the mixed dish is considered non-discretionary</p> <p>Discretionary mixed dishes not to be broken down, even if some of their ingredients are non-discretionary</p>	<p>No change for non-discretionary foods.</p> <p>There was an option to disaggregate mixed discretionary foods into ingredients and to count consumption of non-discretionary ingredients into total non-discretionary food group amounts, though it was not used in all data analysis.</p>	<p>Sax Institute review noted disaggregation of discretionary mixed foods as an ‘incorrect’ interpretation of the dietary guidelines (Lee et al, 2018).</p> <p><i>Note:</i> Description of mixed dishes comes from FSANZ web-based information page about assigning NNPAS foods to ADG classifications (described as recipe foods there).</p>
<p>Dietitians Australia support the Sax Institute review, disaggregation of discretionary mixed foods as an ‘incorrect interpretation of the dietary guidelines’.</p>		
<p>Mixed dishes where the main component is processed meat to be considered discretionary</p>	<p>Not always considered as discretionary e.g. ham sandwiches may have been counted as non-discretionary cereal-based mixed food in line with 2013 ADGs</p>	<p>Suggested in Sax Institute review (Lee et al, 2018)</p> <p>What is the definition of a main ingredient/component? For example, could it be the ingredient with highest amount (%) is the main ingredient as is usually considered in the ingredients list of processed foods?</p>
<p>Dietitians Australia support the Sax Institute review.</p>		
<p>Coated (crumbed and battered) meat, poultry and seafood to be considered discretionary</p>		<p>Sax Institute review indicates these mixed foods should be discretionary regardless of meat or fish type (Lee et al, 2018).</p>
<p>Dietitians Australia support this change.</p>		

<p>All desserts made from dairy or dairy alternatives to be considered non-discretionary (including yoghurt, custards, cheesecakes)</p>	<p>No change</p>	<p>Raised as an issue during consultation of the Health Star Rating 5 year review - should custards and other milk-based sweetened desserts be considered the same as dairy products such as milk, cheese and yoghurts?</p>
<p>Dietitians Australia recommend that desserts high in added sugar should be classified as discretionary. The Australian Dietary Guidelines (eat for health website) states desserts – ice cream and other ice confections, and dessert style custards are relatively high in kilojoules, fat and added sugars and are considered a discretionary choice that should be eaten only occasionally. However, lower fat, lower sugar milk-based desserts including custards, junkets, and puddings, can be made at home. This suggests a distinction between different types of custards e.g., custard pudding, creme caramel or brulee, regular fat, vanilla, commercial would be discretionary.</p>		
<p>Sugar cut-offs for breakfast cereals to refer to total sugar content</p>	<p>No change</p>	<p>AUSNUT nutrient profiles list added sugar content using manual calculations based on the food’s ingredients. Added sugar content cannot be determined from food analysis.</p> <p><i>Note:</i> FSANZ used recipes to develop two data sets for 2011-13 AUSNUT foods with added sugar and free sugar content, specifically for the ABS to assess food consumption patterns against the ADGs (FSANZ, 2014).</p>
<p>Dietitians Australia support no change. Note – there is no standardised method for measuring added sugar at this point in time.</p>		