

Draft National Consumer Engagement Strategy for Health and Wellbeing

Response to consultation
September 2023

Recipient

Ms Tracey Andrews
NPHS@health.gov.au

Dietitians Australia contact

po1@dietitiansaustralia.org.au

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 for the people and communities it serves.

The Accredited Practising Dietitian program provides an assurance of safety and quality and is the foundation of self-regulation of the dietetic profession in Australia. Accredited Practising Dietitians are the qualified and credentialed food and nutrition experts and have an important role to play in sustainable food systems for population and planetary health.

This submission was prepared by Dietitians Australian staff in collaboration with members following the [Conflict of Interest Management Policy](#). Contributors include Dietitians Australia members with wide ranging expertise in areas including public health, chronic disease, food systems and academia.

Summary

Dietitians Australia welcomes the opportunity to respond to this submission.

Dietitians Australia strongly advocates that this Consumer Engagement Strategy reviews the inclusion of commercial and other vested sectors, that is, food and beverage as well as alcohol and tobacco sectors, as the target audience and their inclusion in policy making. The food and beverage, alcohol, and tobacco (including e-cigarettes) industries must not be engaged in public policymaking, norm-setting, program guidance, research, and/or evaluation processes. This is a critical oversight which must be addressed.

Consultation questions

1. The purpose of the strategy and/or the target audience is clear?

Not at all clear.

The purpose of the strategy is clear; however, the target audience is very broad, and not at all clear.

Given the acknowledgement of the commercial determinants of health within the National Preventive Health Strategy, Dietitians Australia recommends conflict-of-interests in consumer and policy-maker engagement is addressed, in greater detail than within the fundamentals – transparency. It is particularly relevant for this Consumer Engagement Strategy that commercial and other vested interests in the food and beverage sector, as well as alcohol and tobacco sectors, are not classified as the target audience (that is, are not classified as consumers or policymakers).

There is a growing body of evidence that commercial entities producing and selling manufactured food, as well as associated actors often attempt to delay, weaken, distort, and/or impede the development of food and nutrition policies and programmes, effectively undermining healthier and more sustainable food systems.¹

The products and practices of a subset of commercial entities whose core business is the production, distribution, marketing and selling of manufactured foods are of specific concern.

Companies producing unhealthy, nutrient poor foods and beverages, high in sodium, sugar, trans-fats and saturated fats, influence all aspects of the food system from the quality of foods in the supply chain, to the environment in which food is made available, affordable and desirable.

The increasing impact of this influence has a negative effect on human and planetary health, and social and health inequities.² It is well established that these products and practices are driving diet-related noncommunicable diseases, including cardiovascular diseases, type-2 diabetes, and poor mental health.^{3,4}

Not explicitly stating that there will be no engagement with the tobacco and e-cigarette sector is a critical oversight and undermines the leadership and action taken by the Government to reduce the rates of smoking and ban e-cigarettes.⁵ The World Health Organization Framework Convention on Tobacco Control Article 5.3 requires Parties (Australia is party to the Convention) to protect their tobacco control and public health policies from commercial and other vested interests of the tobacco industry.⁶

2. Are the objectives for the Strategy clear and appropriate?

Not at all clear.

Dietitians Australia highlights that there are serious issues with the involvement of commercial entities in the co-design of preventive health policies and programs.

In the context of food systems, the food and beverage industry can add valuable technical insights into implementing nutrition labelling, food and beverage reformulation and food fortification. However, to be effective, (government) policies and programs must be free from commercial and other vested interest with the food and beverage industry. For this reason, it is important that commercial and other vested interests (including food and beverage, alcohol, and tobacco industries) are not classified as ‘consumers’ or ‘community organisations’ in this Strategy, or its objectives.

To be clear, the food and beverage industry or alcohol industry must not be engaged in public policymaking, norm-setting, program guidance, research, and/or evaluation processes.

3. Do the Fundamentals capture what you see as essential for consumer engagement?

Clear.

Dietitians Australia advocates for Fundamentals – Transparent to define and expand on conflicts-of-interest. This information should be included within the Toolkit – what is a conflict-of-interest, how should it be managed and when should engagement be ceased based on a conflict-of-interest.

The existing National Health and Medical Research Council Guidelines for identifying and managing conflicts-of-interest⁷ is recommended as a resource.

4. Do you think the Guidelines describe what is needed to help policy-makers work effectively with consumers?

Well.

Dietitians Australia advocates for the following edits to the Good Practice Guidelines:

Guideline 3 - Identify who to engage: to specifically define that this excludes industries with high risk of commercial and other vested interests.

Guideline 4 - Seek and support diverse engagement participation: this can be used as an entry for industry argument that their involvement is an important 'diverse' input. This can be managed by clearly stating in the toolkit/guideline that consumer engagement excludes industries with commercial and other vested interests.

Guideline 10 - Monitor engagement and evaluate impact: to expand on establishing indicators and evaluation measures to assess engagement processes. This is recognised as the most critical section of the Strategy.

The policy cycle stages where commercial entities should be excluded (policy design and issue research) and where consultation can be appropriate (policy implementation) should be highlighted on the diagram.

5. Are the Guidelines explained in a way that makes them useful?

Well.

6. If you have been involved in policy-making before as a consumer, what made your engagement in that process a positive and welcome experience

N/A.

7. Do you think the Toolkit will be easy to use?

Easy.

8. Do you think the Toolkit will help policy-makers better engage consumers in policy-making?

Unsure.

Dietitians Australia would like to learn more about the planned dissemination of the Toolkit, and evaluation indicators and outcomes.

9. Are you supportive of the overall purpose, vision and aim of the Strategy?

Yes.

10. If you are a consumer and haven't been involved in policy making, would you like to be?

N/A.

11. Are there any other engagement approaches that you have found helpful and effective?

N/A.

12. Do you have any other comments or suggestions?

Dietitians Australia strongly advocates that **unhealthy diet** should be included as a risk factor on page 8, along with those listed including physical inactivity, overweight and obesity, smoking and alcohol use. Improving access to and the consumption of a healthy diet is a key focus area of the National Preventive Health Strategy. A nutritious diet is one of the most influential factors contributing to our overall health and wellbeing (page 52).⁸

Conclusion

Dietitians Australia acknowledges the Albanese Government for taking steps to implement The National Preventive Health Strategy, through the development of the National Consumer Engagement Strategy for Health and Wellbeing.

Dietitians Australia calls on the Government to urgently accelerate further implementation activities and the resources required for successful implementation, monitoring, enforcement, and evaluation. This will ensure the policy achievements by 2030, articulated in the National Prevention Health Strategy are attained, and health and wellbeing outcomes realised.

Dietitians Australia advocates that the cornerstone to protect health and wellbeing of people and planet is improving healthy and sustainable food systems. Effective food systems drive good nutrition and health, reducing diet-related illness, food insecurity and malnutrition in all its forms.

A National Nutrition Strategy, as part of the suite of comprehensive policies and other measures of the National Preventive Health Strategy is urgently needed to address the food system which is currently failing to deliver sustainable, affordable, and healthy diets for all Australians.

References

1. World Health Organization. Executive Board, 142. Safeguarding against possible conflicts of interest in nutrition programmes: draft approach for the prevention and management of conflicts of interest in the policy development and implementation of nutrition programmes at country level: report by the Director-General. 2018 World Health Organization. Available from: <https://apps.who.int/iris/handle/10665/274165>
2. Collin J, Hill SE. Industrial epidemics and inequalities: the commercial sector as a structural driver of inequalities in noncommunicable diseases. Health Inequalities. Oxford: Oxford University Press, 2015.
3. Stuckler D, McKee M, Ebrahim S, Basu S. Manufacturing epidemics: the role of global producers in increased consumption of unhealthy commodities including processed foods, alcohol, and tobacco. PLoS Med 2012; 9: e1001235.
4. Moodie R, Stuckler D, Monteiro C, et al. Profits and pandemics: prevention of harmful effects of tobacco, alcohol, and ultra processed food and drink industries. Lancet 2013; 381: 670–79.
5. Australian Government, Department of Health and Aged Care. About smoking and tobacco, e-cigarettes. 2023. Available from: <https://www.health.gov.au/topics/smoking-and-tobacco/about-smoking-and-tobacco/about-e-cigarettes>
6. World Health Organization. Framework Convention on Tobacco Control overview. Available from: <https://fctc.who.int/who-fctc/overview>
7. National Health and Medical Research Council. Identifying and managing conflicts of interest. 2023. Available from: <https://www.nhmrc.gov.au/guidelinesforguidelines/plan/identifying-and-managing-conflicts-interest>
8. Australian Government, Department of Health and Aged Care. National Preventive Health Strategy 2021-2030. 2021. Available from: https://www.health.gov.au/sites/default/files/documents/2021/12/national-preventive-health-strategy-2021-2030_1.pdf