

Response ID ANON-ZKFT-DDBX-1

Submitted to **Aspirations for the food regulatory system**

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About you

What is your name?

Name:

Sophie Carty

What is your email address?

Email:

sophie.carty@cansoc.org.nz

Please tick this box if you would like your response to be confidential

What sector do you represent? (Required)

Not-for-Profit (please specify)

If 'other' sector selected, please specify in the text box:

The Cancer Society provides: supportive care services, health promotion/public health services to prevent cancer, and funds cancer-related research..

What is your organisation?

Organisation name:

The Cancer Society of New Zealand

Which country are you responding from? (Required)

New Zealand

If you selected 'other' please specify country:

The field below provides an opportunity to submit any other information about your organisation.

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The Cancer Society of New Zealand (NZ) is a non-profit organisation which aims to minimise the incidence and impact of cancer on all those living in New Zealand. We work across the cancer continuum with key work areas that include health promotion, supportive care, provision of information and resources, and funding of research. Cancer is New Zealand's single biggest cause of death. The Cancer Society of NZ is providing comment as obesity is the main preventable cause of cancer after tobacco. Food regulation is one of the obesity reduction strategies recommended by both the World Health Organisation (WHO) and the World Cancer Research Fund International.

References:

- New Zealand Ministry of Health website: <https://www.health.govt.nz/your-health/conditions-and-treatments/diseases-and-illnesses/cancer>. Accessed 28 November 2019.
- Ministry of Health Website: <https://www.health.govt.nz/nz-health-statistics/health-statistics-and-data-sets/obesity-statistics> Accessed January 30 2018.
- World Cancer Research Fund website: <https://www.wcrf.org/int/policy/nourishing-database>. Accessed 28 November 2019.

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Challenges and opportunities facing the broader food ecosystem

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

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

Opportunities

- The Cancer Society of New Zealand agrees that changes to our food regulatory system could contribute to the improvement of food quality and affordability to enhance human health and wellbeing. Unhealthy diet and weight related cancers are risk factors for at least 12 cancers. One third of children and two thirds of adults in Aotearoa are overweight or obese, ranking children second and adults third highest of all OECD countries for obesity. Population strategies are recommended as the most cost effective way to equitably address non-communicable diseases like cancer. The Cancer Society recommends that the reform includes objectives to reduce food insecurity and reduce the promotion, normalisation and availability of cheap ultra-processed food.
- For the reform to address environmental sustainability (food waste), food security, and protect food systems valued by New Zealand's indigenous Māori. This would support New Zealand Government's obligations to honour the right to health under Te Tiriti o Waitangi.
- To expand the food regulatory remit to include regulation and monitoring of the marketing of unhealthy food, non-alcoholic and alcoholic drinks.

- To expand the remit to include regulation of ingredients and management of pricing schemes, such as minimum pricing for alcohol, and sugary drinks.

Challenges

- The current food system is not working to protect human health and wellbeing. Rates of diet related disease in New Zealand are high .
- Furthermore, our food system is not equitable. There are rising levels of food insecurity and disadvantaged groups do not have access to safe, nutritious and culturally appropriate food. As a result, Māori and Pasifika peoples in New Zealand suffer a disproportionate burden of diet- and weight-related cancers. Colonisation, loss of food sovereignty and socioeconomic conditions including food insecurity contribute to this inequity. Unhealthy food environments that normalise and promote affordable ultra-processed food, often more so in poorer communities, also contribute to these inequities.
- We are surrounded by cheap unhealthy food options. Unhealthy foods are full of cheap ingredients like salt, sugar, and fat, which makes them more profitable to market and sell.
- o Our current Health Star Rating System has very low uptake and not functioning as an effective tool to improve public health. If the goal is to improve health, we need clear, transparent labelling on all processed foods. This will mean cheap unhealthy ingredients have nowhere to hide, food manufacturers will use less of them, and people will have more healthy options.
- o Unhealthy food and drink marketing is targeting disadvantaged groups more (Māori and Pasifika children), with new technologies and digital marketing compounding the problem.
- o A lack of transparency about prioritisation of decisions, and independence in governance structures when developing initiatives to improve health. For example, international research shows that the alcohol industry suppresses research and denies the evidence that it causes cancer.
- Ensuring the reform does not weaken New Zealand's existing regulations designed to protect public health. Particularly, regarding the potential harms associated with unregulated food as medicine claims (general level health claims and/or high level health claims). These include potential for foods to interact with medicines, potential for people to adopt intake of foods as an alternative to medicines, and the costs of foods and other dietary supplements to consumers who purchase these believing that they have some therapeutic benefit. This could have detrimental effects on those who have experienced cancer. The regulatory framework in New Zealand is more rigorous than that of Australia, therefore, if FSANZ takes a greater role in working with businesses in pre-market entry phase it would be important that this role is consistent with existing MPI practice, rather than existing practice in Australia.
- A lack of resourcing from the public health sector and consumer groups when compared to the food industry.

References

- World Cancer Research Fund/American Institute for Cancer Research. Diet, Nutrition, Physical Activity and Cancer: A Global Perspective.; 2018. doi:10.1016/j.scienta.2014.02.005
- Ministry Of Health. Obesity. <https://www.health.govt.nz/our-work/diseases-and-conditions/obesity>. Published 2019.
- Unicef. The State of the Worlds Children. Children and Nutrition. Growing Well in a Changing World; 2019. <https://www.unicef.org/media/63016/file/SOWC-2019.pdf>.
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- Cancer Society of NZ. Position Statement Diet and Cancer. Accessed: <https://otago-southland.cancernz.org.nz/assets/Positions-Statements/Diet-and-Cancer-Position-Statement-2020.pdf>
- Mackay S, Ni Mhurchu C, Swinburn B, Eyles H, Young L, Gontijo de Castro T. State of the Food Supply. New Zealand; 2019. file:///C:/Users/vicki/Downloads/State of the Food Supply University of Auckland 2019.pdf.
- Ministry of Primary Industries. The Health Star Rating System in New Zealand 2014-2018. <https://www.mpi.govt.nz/dmsdocument/31635/direct>.
- Activity & Nutrition Aotearoa. Food and beverage Marketing to Children: Evidence Snapshot. Accessed: <https://ana.org.nz/wp-content/uploads/2018/11/ANA-Evidence-Snapshot-FINAL.pdf>
- The Arrogance of Power: Alcohol Industry Interference With Warning Label Research" <https://www.jsad.com/doi/full/10.15288/jsad.2020.81.222>.

Objectives and scope of the food regulatory system

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?

No

If you answered 'no', please explain why not. :

- While we agree that reforms should include interface management, the Cancer Society would support the focus to be reforming the system to be outcome-based, rather than focusing on the means to get there. The Cancer Society would like to see the protection of human health and wellbeing, and environmental sustainability being a key focus and outcome of the reforms.
- Public health and the food and drink industry have different objectives. If the goal is to protect public health and prevent disease, such as cancer, priority should be given to public health evidence and expertise. The Cancer Society supports the implementation of a number of standards and regulations that have been proven to contribute to healthy diets. The food industry is there to make a profit and can undermine both the implementation of interventions, and the interventions efficacy. For example, as seen with the development of the Health Star Rating system as opposed to a traffic light system, and its voluntary approach which has resulted in low uptake.

References

- Outcome-based Regulations Policy. Accessed: <https://www.inspection.gc.ca/about-cfia/acts-and-regulations/safe-and-responsive-regulatory-framework/outcome-based-regulations/eng/1545927831816/1545927832066>.
- Cancer Society of NZ. Position Statement Diet and Cancer. Accessed: <https://otago-southland.cancernz.org.nz/assets/Positions-Statements/Diet-and-Cancer-Position-Statement-2020.pdf>

Aspirations for the food regulatory system

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

Yes

If you answered 'yes', what is missing from these aspirations and high level actions? :

As mentioned in a previous question the Cancer Society would support the goals and aspirations to be outcome focused. For example;

- protecting human health and wellbeing,
- supporting innovation.

High-level actions the Cancer Society would like to see included are;

- Reducing inequities in the food system and food environment caused by oversupply and marketing of cheap unhealthy food and drink in comparison to healthy food and drink.
- Implementation of principles of good governance such as transparency, independence, equal access, and adequately managing competing interests. For example, ensuring that third party audits are independent/accredited or approved audits only (i.e. not information provided by industry without independent substantiation).

4 Are there any aspirations or high level actions that you disagree with?

Yes

If you answered 'yes', which ones and why? :

The Cancer Society does not support establishing processes to facilitate the development and recognition of industry-led guidance or codes of practice for actions and interventions FSANZ wants to implement in order to improve public health. Industry stakeholders and public health stakeholders do not share similar objectives. The Cancer Society supports evidence-based interventions including, Government set targets for food reformulation, and Government-led regulation of marketing of unhealthy food, alcoholic and non-alcoholic drinks. It is the Government's responsibility to protect health, not the food industry, who is there to make a profit.

Furthermore, as a public health stakeholder the Cancer Society does not have sufficient resource to manage risk, drive outcomes, and be responsible for promoting healthy food across the supply chain. Comparatively, the food industry is well resourced which may result in a lack of prioritisation of health aspirations and actions. For health aspirations and actions to be successful sufficient resourcing needs to be allocated to the work stream by Government.

Reference

Cancer Society of NZ. Position Statement Diet and Cancer. Accessed:

<https://otago-southland.cancernz.org.nz/assets/Positions-Statements/Diet-and-Cancer-Position-Statement-2020.pdf>.