

General questions

Do you support nutrient reformulation as a public health measure? (Required)

- Yes - please add comments and evidence

Please provide details

The Global Obesity Centre (GLOBE) strongly supports nutrient reformulation as a public health measure to improve the diet and health of Australians. Dietary risk factors are a lead contributor to the burden of disease in Australia and given they are a modifiable risk factor; significant efforts should be made to support healthy diets.

National and international guidelines recommend avoiding excess energy consumption and limiting foods high in salt, added sugar, and saturated fat (Australian Dietary Guidelines and the World Health Organization). Excess consumption of these risk nutrients is associated with increased risk of non-communicable diseases (NCDs), including cardiovascular disease, type 2 diabetes, obesity and some cancers.

Australia has an obesogenic environment that promotes excess consumption of unhealthy foods. Processed foods form a significant part of our diets as the availability and affordability has increased over the years. The state of our food environment and its role in contributing to obesity highlight the need for new strategies to support healthy eating. Developing reformulation targets is a key recommendation from the Tipping the Scales report that identified key areas of action for the Australian Federal Government to address the obesity problem. Reformulation of processed foods is a practical, cost-effective and equitable approach to improving the nutrition profile of processed foods and therefore the population's diet.

Reformulation of processed foods to reduce levels of risk nutrients has the potential to create system wide change that benefits all consumers. This kind of approach is critical to support individual approaches to improving population diets and ensures an equitable approach to improving diets as it includes those from vulnerable groups.

With regards to the details of the reformulation targets themselves, GLOBE endorses the specific recommendations as set out by The George Institute for Global Health in their submission, and those of the Obesity Policy Coalition. We acknowledge the rigour and thoroughness in their recommendations, and believe that they have recommended meaningful targets across the categories.

Monitoring

In addition to the benefits to consumers of setting reformulation targets, it also provides a great opportunity for monitoring and evaluation of processed food and food companies' commitment to health. GLOBE currently conducts monitoring and evaluation of food companies policies and commitments relating to nutrition and obesity prevention using the Business Impact Assessment - Obesity and population nutrition tool developed by INFORMAS. In reports released in 2018, companies were assessed on whether they had commitments to reformulating products to reduce levels of risk nutrients such as sugar, saturate fat, sodium. In lieu of set targets, the ability to evaluate the appropriateness of each company's targets is limited. The development of reformulation targets will assist in benchmarking companies and monitor their progress towards improving the nutrition profile of their products.

In addition to the development of the reformulation targets, GLOBE strongly supports a clear, transparent and standardised process for the monitoring and evaluation of their implementation. In order to facilitate effective and timely monitoring, appropriate resources need to be provided by the government for these purposes. In addition, strong incentives need to be put in place to facilitate sharing of relevant data (in standardised formats) from food manufacturers for the purposes of monitoring. Furthermore, standardised metrics for reporting progress need to be put in place. This should include metrics that enable reporting of mean values for particular nutrients by food sub-category at the company and brand level, including changes (in absolute and relative terms) from a standard baseline period. Many companies that currently report on their reformulation efforts do so in ways that make comparison and understanding difficult (e.g. "Company X has removed x tonnes of salt from the food supply over the last 10 years", "Company Y commits to reduce overall kgs of sugar sold by y by 2025"); whereas it would be much clearer to be able to say "Company X has lowered salt content from a mean value of x/100g in 2018 to y/100g in 2020 in food sub-category Z". Given the voluntary nature of the reformulation targets, monitoring is essential to track progress and to determine if the voluntary approach to reformulation is effective.

Furthermore, any reformulation strategy should be embedded in a regular, comprehensive monitoring system of Australians diets and weight over time. Changes to both overall population and high risk population sub-group dietary intake should be monitored. This includes potential health benefits, but also any potential adverse consequences of reformulation. For example, the health effects of replacing sugars with artificial sweeteners. Monitoring should also ensure one risk nutrient is not replaced by another as has been seen in the past with reductions in fat content accompanied by increases in sugar content.

Technical considerations

GLOBE recommends the government supports existing and new programs that support food companies on the technical and policy aspects of reformulating their products. There are existing examples of such support, for example the Victorian Food Innovation Network.

As the reformulation targets are currently voluntary, GLOBE recommends the consideration of further incentives or disincentives for food manufacturers. For example, ongoing public reporting of company-specific progress towards reformulation targets. Further, transitioning to a mandatory Health Star Rating system would better reflect changes in nutrition profiles, therefore both incentivizing action and disincentivizing inaction towards targets. To this end, GLOBE suggests that the current review of the Health Star Rating system should consider cut-offs in line with reformulation targets. In addition, the Health Star Rating review should consider integration of added sugars into the algorithm as per the Australian Dietary Guidelines, and the proposed sugar reformulation targets.