

Response ID ANON-6FQR-VFGE-7

Submitted to **Public Consultation- Food Regulation Policy Guideline**

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About you

1 What is your name?

Name:

Sophie Carty

2 What is your email address?

Email:

sophie.carty@cansoc.org.nz

3 What sector do you represent?

Drop down list about which sector the respondent represents:

Public health

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

4 What is your organisation?

Organisation:

The Cancer Society of New Zealand Inc.

5 Which country are you responding from?

Drop down list about which country the respondent is based:

New Zealand

If you selected 'other' please specify country:

6 An opportunity to submit any other information about your organisation you would like to provide.

An opportunity to provide any other information about your organisation.:

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 (1). The Cancer Society of NZ is making a submission as obesity is the single biggest preventable cause of cancer after tobacco (2) . Food labelling regulation is one of the obesity reduction strategies recommended by both the World Health Organisation (WHO) and the World Cancer Research Fund International (3) as an effective intervention to help people understand more about food products and to reduce the amount of sugar, salt and fats that food manufacturers add to our food.

1. New Zealand Ministry of Health website: <https://www.health.govt.nz/your-health/conditions-and-treatments/diseases-and-illnesses/cancer>. Accessed 28 November 2019.

2. Cancer Research UK Website: <https://www.health.govt.nz/nz-health-statistics/health-statistics-and-data-sets/obesity-statistics> Accessed January 30 2018.

3. World Cancer Research Fund website: <https://www.wcrf.org/int/policy/nourishing-database>. Accessed 28 November 2019.

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Overall comments on the Policy Guideline

7 What are your overall comments on the Policy Guideline?

Text box for response:

The Cancer Society supports the aim of the Food Policy Guideline to:

"...support current and future food labelling topics to be considered through a whole-of-diet approach that uses the Dietary Guidelines as a principle focus and helps ensure that any emphasis on food labels about a particular nutrient or food is justified by the recommendations in the Australian and New Zealand Dietary Guidelines."

Dietary guidelines are recognised as the practical way to reach the nutritional goals for a given population (4) . Research recognises that it is the overall pattern of food eaten or our total diets, rather than nutrients, which is the most important focus when it comes to healthy eating (5).

The Cancer Society recommends changing the title of the guideline to:

Food Industry Policy: Guideline on food labelling to ensure consumers have sufficient information to make informed decisions about healthy food products.

The policy guideline appears to be targeted at the consumer rather than the food industry's labelling. The Cancer Society recommends changing the wording

around to have a stronger focus and onus on the labels having to provide enough information. Labels need to have enough information on them so that people can easily identify healthy and unhealthy food products.

4. Food-based approaches to meeting vitamin and mineral needs. Accessed: <http://www.fao.org/3/Y2809E/y2809e08.htm>

5. Position of the Academy of Nutrition and Dietetics: Total Diet Approach to Healthy Eating. Accessed: [https://jandonline.org/article/S2212-2672\(12\)01993-4/pdf](https://jandonline.org/article/S2212-2672(12)01993-4/pdf)

Impact of the Policy Guideline

8 How would this Policy Guideline impact you/your organisation?

Provide information about how this Policy Guideline would impact you/your organisation:

Clear and understandable food labelling would support health promotion activities, including policy and advocacy efforts that the Cancer Society undertakes in relation to the prevention of nutrition-related cancers.

Potential unintended consequences

9 Are there any potential unintended consequences associated with this Policy Guideline?

Provide feedback on any potential unintended consequences associated with this Policy Guideline:

The New Zealand Government is a partner in the Treaty of Waitangi. Therefore, any potential unintended consequences for Māori should be considered with this policy guideline. Therefore, Cancer Society recommends appropriate consultation with tangata whenua in New Zealand.

The guidelines discussed the role of education in increasing consumer awareness of the dietary guidelines to support work on food labelling. This has merits as the dietary guidelines have not been promoted much previously. However, it is important to be aware that education campaigns can increase inequity (6). To support food labelling, the World Cancer Research Fund also recommends using the NOURISHING Framework to influence food environments, food systems and food behaviours (7). The World Cancer Research Fund states that a whole-of-government, and whole-of-society approach is needed to enable people to consume healthy diets and enable people to consume foods which follow the cancer prevention recommendations (8). For example, setting Government-led targets to cut down the sugar, salt and fats that food manufacturers add to our food, or changing our surrounding food environment to have less unhealthy food available would be more effective interventions.

If the policy guideline is not effective, there could be unintended consequences for consumers such as, higher food prices, with no correlative health benefit (9).

6. Gill, T. P., & Boylan, S. (2012). Public Health Messages: Why Are They Ineffective and What Can Be Done? *Current Obesity Reports*, 1(1), 50-58. doi:10.1007/s13679-011-0003-6.

7. World Cancer Research Fund. Policy Public Health Implications. Accessed: <https://www.wcrf.org/dietandcancer/recommendations/policy-public-health-implications>.

8. World Cancer Research Fund. Limit fast foods, fat, sugar. Accessed: <https://www.wcrf.org/dietandcancer/recommendations/limit-fast-foods-fat-sugar>

9. Black, Ellen, Menu Labeling: The Unintended Consequences to the Consumer (2014). *Food and Drug Law Journal*, Vol. 69, pg. 531 (2014); Belmont University College of Law Research Paper No. 2017-31. Available at SSRN: <https://ssrn.com/abstract=3030875>.

Specific feedback on the Policy Guideline

10 What are your comments on the 'Aim'?

Provide feedback on the 'Aim' in the Policy Guideline:

As mentioned in the overall comments about the title of the policy guideline the Cancer Society of NZ would like to recommend re-framing the discussion away from consumers. We recommend re-framing the guideline to be about ensuring labels have more information. Evidence shows that misleading food labels trick many people into thinking the food they are buying is healthy when, in reality it's not (10,11). New Zealand's Consumer organisation has also raised misleading food labels and packaging as an issue (12).

10. Northup, T. (2014). Truth, lies, and packaging: how food marketing creates a false sense of health. *Food Studies*, 9.

11. Hamilton, V. N. (2018). Determining Millennial Food Buying Preferences: Based on Product Marketing with "Buzzwords".

12. Food labels may be designed to fool. *Stuff news*. Accessed: <https://www.stuff.co.nz/business/91735074/heres-how-to-get-to-the-truth-about-what-you-eat>.

11 What are your comments on the 'Policy Principles'?

Provide feedback on the 'Policy Principles' in the Policy Guideline:

The Cancer Society of NZ supports the 'Policy Principles'.

12 What are your comments on the 'Scope'?

Provide feedback on the 'Scope' in the Policy Guideline:

A number of countries around the world are starting to integrate sustainability recommendations into their dietary guidelines, such as Canada and Brazil. Therefore, excluding sustainability from the policy guideline may need to be reconsidered.

13 What are your comments on the 'Definitions'?

Provide feedback on the 'Definitions' in the Policy Guideline:

No comment.

14 What are your comments on the 'Context'?

Provide feedback on the 'Context' in the Policy Guideline:

- Please see previous comment on the role of education under unintended consequences.
- Suggest a reword of: Food labels are one of many sources of information available to support consumers to make informed choices when selecting foods to eat.
To: Food labels are important to give people enough information to make informed decisions about healthy food products.

15 What are your comments on the 'Reviews and Updates'?

Provide feedback on the 'Reviews and Updates' section in the Policy Guideline:

The Cancer Society of NZ is supportive of regular review and updates when necessary.

Feedback on structure and format

16 What are your comments on the overall structure and format of the Policy Guideline?

Provide feedback on the overall structure and format of the Policy Guideline:

No comments.

Other general comments

17 Do you have any other general comments on the Policy Guideline?

Provide general comments on the Policy Guideline:

Overall, the Cancer Society of NZ supports the goals of the policy guideline to ensure labels have enough information on them to facilitate a whole-of-diet approach to population health.