

AUSTRALIAN BEVERAGES COUNCIL

Submission to the Draft National Preventive Health Strategy

21 April 2021



The Australian Beverages Council's Response to Online Survey Questions

1. What is your name?

Australian Beverages Council Limited [ABCL].

2. What is your email address?

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3. What is your organisation?

The ABCL is the leading peak body representing the non-alcoholic beverage industry, and the only dedicated sector representation of its kind in Australia.

The ABCL represents approximately 90 per cent of the industry's production volume and its Member companies are some of Australia's largest drinks manufacturers. The ABCL also represents many small and medium-sized companies across the country.

Collectively, the ABCL Members contribute more than \$7 billion to the Australian economy and nationally they employ approximately 50,000 people. The industry also pays in excess of \$1.2 billion in taxation per annum along its supply chain, and for every direct employee in the beverages manufacturing industry, there are 4.9 jobs required elsewhere in the Australian economy to produce and retail the beverages.

The ABCL strives to advance the industry as a whole, as well as successfully representing the range of beverages produced by Members. These include carbonated soft drinks, energy drinks, sports and electrolyte drinks, frozen drinks, bottled and packaged waters, juice (no added sugar) and fruit drinks, cordials, iced teas, ready-to-drink coffees, kombucha, flavoured milk products and flavoured plant milks.

The ABCL advocates on issues such as portion sizes, environmental sustainability, nutritional labelling, responsible industry marketing and advertising, and canteen guidelines, among others. Our Members listen to consumers and adapt their products accordingly by making positive changes and standing by a commitment to promote greater choice, appropriate portions and by developing an ever-increasing range of low and no sugar products.

The ABCL is an important conduit between the non-alcoholic beverage industry and governments, supporting the Australian Government, State/Territory Governments and Local Councils.

The drinks industry is an integral part of Australia's critical infrastructure whose assets, systems and networks are vital for the nation's ongoing security, economic prosperity, health and safety. Like many other sectors, the drinks industry has a long history of partnering with governments on a range of important matters to solve complex problems, including the handling of post-consumer waste.

As requested, the ABCL has responded to the draft preventive health strategy consultation in the format of the online survey questions.

4. VISION

Do you agree with the vision of the Strategy?

ABCL Response:

The ABCL supports the vision of the Strategy and recommends that stronger consideration is given to the following principles:

- Preventive health requires a multi-faceted approach that should focus on early intervention, be adaptable for all ages across a lifespan of the population and be appropriate for culturally diverse groups.
- The vision encompasses the intricacies of building systemic change through a long-term approach to prevention.
- The Strategy identifies the importance of interrelationships and interdependencies in a collective effort to make prevention effective.
- The Strategy recognises that responsibility for creating positive change is shared by government, industry, NGOs, communities and individuals.
- The Strategy is developed using the best evidence from a range of sources, including targeted consultations with industry experts.
- The Strategy considers other relevant national strategies and efforts by multi-sectorial partners to contribute to Australia's Long-Term National Health Plan.
- The Strategy considers relevant health consultations and surveys conducted by the Australian Government and peer-reviewed industry studies, e.g., the National Nutrition and Physical Activity Surveys.
- The Strategy establishes clear and practical baselines for recommended targets and policy achievements.
- The governance of the Strategy supports continuous monitoring and periodic reviews to apply up-to-date practices and reflect current scientific research.

The non-alcoholic beverages industry has a long and proud history of partnering with governments on a range of important matters, including Container Deposit/Refund Schemes, the Health Star Rating (HSR) scheme, health and wellbeing policy, and environmental policy. The ABCL has been heavily involved in the oversight of the Healthy Food Partnership (HFP) through its various working groups, such as the Implementation Monitoring Evaluation Reference Group. The governance structure of the HFP is practical as it involves collaboration with industry and public health groups at roundtable, working group and executive committee level. The ABCL supports governance and

review structures that are similar in nature to the HFP, particularly those that include opportunities for collaboration and partnership across stakeholder groups.

The ABCL welcomes opportunities to participate in joint government-industry consultative processes and act as a conduit between the non-alcoholic beverages industry and the formal oversight structure. It is important that in each and any committees or working groups created as part of the Strategy that the food, beverages and grocery sector is represented through formal membership of these groups.

5. AIMS

Do you agree with the aims and their associated targets for the Strategy?

ABCL Response:

The ABCL supports the aims listed in the Strategy as they encompass the systems-based approach that is required to ensure an effective prevention system. We concur that to broaden the understanding of the determinants of health the focus should shift to seek a deeper understanding of the environmental and socio-cultural influences on health, specifically from early childhood.

While the ABCL supports measures for all Australians to live as many years as possible in full health, there are many factors which bear influence on health including socioeconomic, cultural, environmental, biomedical and commercial influences. These have been identified in the Strategy but it is unclear how these will be considered in achieving the targets set for Aims 1 – 3.

The ABCL recommends that the targets measure beyond total DALY's and HALE's, and the Strategy identifies a measure of full health that considers the interplay of the above-mentioned influences.

6. PRINCIPLES

Do you agree with the principles?

Principle 1: Multi-sector collaboration

ABCL Response: Supports and encourages consultation with industry to inform policy

The ABCL strongly supports and encourages partnerships between government, the health sector and the food and beverage industry, and has partnered many times on a range of policy matters, including Container Deposit/Refund Schemes, Health Star Rating scheme, health and wellbeing, and environmental policies.

To inform policy and ensure effective change, government must consult with industry through this Strategy. In depth engagement and collaboration with different sectors ensures the development of robust integrated solutions to complex prevention challenges.

The non-alcoholic beverage industry's Sugar Reduction Pledge is an example of successful multi-sector collaboration:

- The Pledge is an industry commitment to reduce sugar across the industry's portfolio by 20 per cent by 2025. Progress towards targets is independently measured.
- The latest progress report, released in October 2020¹, demonstrated significant progress towards the 2025 target, with a 12 per cent reduction in sugar across 2015 – 2020 (first half).

¹ [Australian non-alcoholic drinks industry Sugar Reduction Pledge second progress report 2020](#)

- This significant progress demonstrates the effectiveness of actions being taken by pledge signatories, including product reformulation (reducing sugar content of existing products), smaller pack sizes, product innovation (creating new lower or no sugar drinks) and innovative marketing to drive behaviour change towards no- and low-sugar options.
- These actions not only reflect changing consumption trends but also serve to shift purchasing behaviour and reinforce a continued commitment by industry to reduce sugar content.
- In addition to pledge signatories, the Pledge contains a supporter tier for beverage companies that can commit to a range of other initiatives in support of the Pledge's overarching objective to help people choose a drink with less, low or no sugar as a way to supporting a healthy lifestyle.
- Supporter Members will undertake a range of measurable activities which will be subject to rigorous and regular review, including but not limited to: reformulation, increasing volume sales of low and no- sugar varieties, introducing smaller pack sizes, a cap in sugar content on all existing drinks brands and promoting consumption of bottled water by young Australians as the choice of beverage over other options.

The ABCL recommends that the Strategy recognises existing and planned multi-sectoral partnerships and the industry's efforts in achieving sustainable and effective outcomes rather than duplicate efforts to achieve policy targets of the Strategy.

Principle 3: Community engagement

ABCL Response: Supports and welcomes collaboration with government to create community-based initiatives with proposed strategies

The ABCL supports targeted interventions for rural and remote communities and those communities experiencing disadvantage to ensure intervention levers are appropriate for each community. We note existing programs across Australia are achieving significant change to the number of years lived in full health:

- **The OPAL Program – South Australia**

The OPAL program is the largest childhood prevention program in South Australia that is multi-setting, multi-sectoral and community-based². The program has taken multifaceted steps towards a healthier community in consultation with industry including encouraging children and families to improve eating and physical activity habits. A 2016 evaluation³ of the OPAL program found that children in the OPAL community had a:

- 53 per cent reduced likelihood of obesity in children 9-11 years compared to the control group;
- 50 per cent increased probability of meeting the daily recommended servings for fruit, with no change in probability in the control group;
- 50 per cent increased probability of meeting the discretionary ("extra") food and drink guideline compared to children in the control communities; and

² City of Playford (2016). OPAL: The City of Playford Available from: www.playford.sa.gov.au/OPAL.

³ Flinders University (2016). OPAL Evaluation Project Final Report.

- 60-70 per cent more likely to meet the physical activity guidelines at the end of the intervention, although no significant difference versus the control community.
The non-alcoholic beverage industry is supportive of initiatives similar to the OPAL program involving beverage companies, local leaders and other stakeholders to educate and enact change across communities. Raising community awareness of industry initiatives which improve the health of Australians encourages acceptance of these initiatives and leads to greater influence and effective change.

Similar interventions have taken place in a number of communities in the USA:

Community support in USA

The American Beverage Association partnered with local leaders including mayors and public health groups to collaborate on community health initiatives and drive effective change across communities. In East Los Angeles, beverage companies began working with supermarkets, convenience stores, restaurants and local partners in communities as part of the Balance Calories Initiative. The 2015 initiative aims to reduce beverage calories consumed per person by 20% by 2025 across the nation.⁴ Efforts in eastern Los Angeles to build healthier communities include:

- working with retailers to display and offer reduced-calorie/kilojoule beverages;
- offering in-store samples and other incentives to try new beverages;
- partnering with community organisations to educate families about this new initiative;
- education to increase calorie awareness.

Similar initiatives have been developed in: New York City; Greater Montgomery; Little Rock; and the Mississippi Delta.

The ABCL welcomes the opportunity to collaborate with Government on developing community-based initiatives for populations at risk of poor diets and less healthy lifestyles. The ABCL proposes the following strategies:

- Improve knowledge, awareness and skills to enable healthy eating, facilitate active lives and foster healthy social practices, regardless of weight.
- Engage and support local communities to develop and lead their own healthy eating and physical activity initiatives through responding to local need, embedding participation and building community capacity.
- Enable and support workplaces, healthcare facilities and tertiary institutions to lead by example by creating health promoting places of excellence.

Principle 4: Empowering and supporting Australians

ABCL Response: Supports existing initiatives such as front-of-pack labelling tools to educate consumers and empower them to make informed choices

The ABCL supports actions focused on providing targeted information to Australians to enable them to make informed decisions about their health. The beverage industry is committed to providing

⁴ American Beverage Association. East Los Angeles. Available at: <https://www.balanceus.org/community-support/balance-la/> Last accessed 11 December 2019

informed choice to consumers through the Health Star Rating (HSR) system and will continue to encourage uptake of HSR by beverage companies over the next four years.

Health Star Rating system

As a front-of-pack labelling mechanism, the HSR system is performing well, with most consumers viewing the HSR as easy to understand in helping them decide which beverages contain less sugar.

As stated in the HSR Five Year Review Report (the Review), 23 per cent of surveyed Australian consumers were influenced by the HSR to change their purchasing behaviour and purchase a product with more stars.⁵⁶ Importantly, the HSR system is also encouraging positive reformulation of foods and drinks.

With adoption of the recommended changes from the Review and additional consumer awareness campaigns, the ABCL anticipates increased, positive consumer awareness and influence on purchasing behaviour.

The ABCL recommends the Strategy considers the established HSR adoption targets and associated timelines that were agreed at the recent five-year review, when reviewing and monitoring industry's progress towards empowering and supporting Australians through informed choice. It is important that the Strategy recognises the commitment by industry to the HSR scheme when setting actions for each of the policy achievements under Focus Area 2.

Case study: Nutritional education – Healthy Food Partnership

An important part of the Healthy Food Partnership is its focus on 'improving consumers' knowledge and awareness of healthier food choices, including through developing and publicising tools and resources to consumers and health professionals.

Members of the ABCL recognise the responsibility they have to Australians who consume a range of the industry's products every day. In supporting and empowering consumers to make healthier choices, ABCL Members have agreed to:

- restrict availability of sugar-sweetened beverages in schools;
- not market sugar-sweetened beverages to children under 15 years of age;
- encourage only milk, juice (no added sugar) and water for the young, and only milk and water for the very young; and
- clearly display kilojoule/energy content of each can or bottle on the front-of-pack.

The ABCL recommends that the Strategy recognises the existing commitments by the food and beverage industry through the Health Star Rating system and Healthy Food Partnership for its educational purpose and contribution to providing more informed choice and recommends the Strategy looks to build on these initiatives to attain policy achievements.

⁵⁵ MP Consulting (2019). Health Star Rating System Five Year Review Report.

⁵⁶ MP Consulting (2019). Health Star Rating System Five Year Review Report.

Principle 5: Adapting to emerging threats and evidence

ABCL Response: Supports use of best evidence to develop the Strategy and recommends continuation of this approach. The ABCL also recommends careful consideration is given to avoid unintended consequences of adopting unproven, untested strategies.

The ABCL supports the development of the Strategy based on the best evidence available from a range of sources. The ABCL recommends that this approach is continued through the development of the Strategy and its modelling for 2030 targets. The ABCL also recommends that careful consideration of 'emerging issues and science' is given the high risk of unintended consequences of unproven, untested strategies. Only the most credible, highest quality evidence should inform the Strategy taking into account the totality of the evidence base. The same sensible approach used for updating the National Obesity Strategy should be applied for the Strategy.

7. ENABLERS

Do you agree with the seven enablers?

The ABCL is supportive of the actions to mobilise a prevention system but requires further clarity to comment on specific action areas with confidence. The key positions of the non-alcoholic beverage industry on six of the seven listed enablers are detailed below.

Leadership, governance and funding

ABCL Response: Supports appropriate governance structure and supports formation of expert steering committee driving this work, including members from industry

The ABCL recommends that an appropriate governance structure is formed for an effective long-term Strategy and involves continuous monitoring and improvement. The ABCL is supportive of the formation of an expert reference group committee to provide effective oversight of the Strategy with representatives from the food, grocery and beverage sectors. It would also be appropriate that this committee be subject to periodic review.

The Strategy should be subject to the scrutiny of the Office of Best Practice Regulation (OBPR), particularly in relation to:

- the likely impact on businesses, community organisations and individuals;
- small business impacts;
- competitiveness; and
- clear policy objectives.

The ABCL supports the need for the Strategy to be reviewed and seeks such a review to be carried out at least every five years to ensure relevant elements of the Strategy align with the Australian Dietary Guidelines (ADG) and the latest evidence, including dietary surveys and consumer research. Aligned with a recommendation to update the ADG, the ABCL recommends sustainable funding for regular National Nutrition and Physical Activity Surveys to ensure policymaking is based on up-to-date consumer behaviour including food and drink consumption, nutrient intakes and dietary trends.

We note the last comprehensive survey took place in 2011-12 and policymakers are currently making policy decisions based on this outdated data.

In order to develop accurate evidence-based policy, it is important that the Federal Government, through the Australian Bureau of Statistics, conducts regular surveys of the Australian population to estimate current food and nutrient intakes, and changes over time.

In a similar manner to the United States' National Health and Nutrition Examination Survey (NHANES), we recommended funding be allocated for National Nutrition and Physical Activity Surveys of all Australians aged 2+ years every three to five years. Currently, the National Nutrition Survey is carried out in Australia on a sporadic basis. As other stakeholders have noted, to complement this research, it would be worthwhile reinstituting the collection of Australian Bureau of Statistics Apparent Consumption data for all core commodities.

Partnerships & Community Engagement

ABCL Response: Supports multi-sectoral partnerships and collaboration with government to better engage with communities and empower them.

The ABCL strongly supports the inclusion of partnerships in the implementation of the Strategy as with any public health policy, multi-sectoral action is developed with industry stakeholders through an engagement process. The ABCL has been involved with other long-term strategies, including the successful Health Star Rating system and the Healthy Food Partnership. Evidently, in overseas jurisdictions, it is commonplace for industry, government and non-government organisations to collaboratively work on multi-year strategies:

- WHO, Global Action Plan for the Prevention and Control of non-communicable diseases (2013-2020)⁷ recognises and encourages multi-sectoral action as the most effective way to address complex problems like preventive health.
- Evidence-based strategies have been identified in key global reports including the following which demonstrate collaboration and partnerships:
- In the case of obesity, the **McKinsey Global Institute's *Overcoming Obesity: An initial economic analysis***⁸ analysed a wide range of interventions to tackle obesity, ranking portion control, reformulation and availability of energy dense products as the most impactful interventions ahead of media restrictions and taxes.
- **OECD, *The Heavy Burden of Obesity: The Economics of Prevention***.⁹ This recently released report identified communication-based approaches such as regulation of advertising, food labelling, menu labelling and mass media campaigns as the most economically effective policy measures, as well as reformulation to achieve a 20% calorie reduction in energy-dense foods and drinks. The OECD report recognises that strategies to reduce obesity may have cross-sectoral effects, for example on climate change, however creating truly synergetic policies is challenging, requiring extensive stakeholder input from across sectors.

⁷ World Health Organisation. Global Action Plan for the Prevention and Control of NCDs 2013-2020. Geneva: 2013. Available from : https://www.who.int/nmh/events/ncd_action_plan/en/

⁸ McKinsey Global Institute (2014). Overcoming obesity: an initial economic analysis

⁹ OECD (2019). Heavy Burden of Obesity. The Economics of Prevention.

The ABCL strongly supports extensive consultations with stakeholders including food and beverage industries in the development of policy recommendations and strategy setting.

Information and health literacy

ABCL Response: Supports education and greater accessibility to high quality evidence-based information.

The ABCL supports education to assist consumer understanding and use of the Australian Dietary Guidelines to build healthier eating patterns. This is of particular importance for children so they can carry these skills as they move through each life stage. The ABCL is also supportive of ensuring information and initiatives are culturally appropriate and delivered in a manner that considers the needs of those who have English as their second language.

The ABCL supports continuous monitoring of scientific research and surveys to ensure health information literacy is reflective of best evidence and current to the dietary needs of Australians.

Research and Evaluation

ABCL Response: Supports policy achievements to improve research and evaluation of local initiatives for potential upscale. The ABCL recommends that research is more regularly updated to ensure policy development is well-informed and reflective of current evidence.

The ABCL supports the continuous monitoring of emerging research and consideration in periodically reviewing the Strategy in meeting its objectives. The ABCL recognises the need for stronger collaboration between government and researchers, however, supports its current framework that policy decisions are made by policy experts based on the scientific evidence that is reviewed and communicated by researchers. It is also important that researchers, academics, public health stakeholders and industry representatives are provided with appropriate channels to advocate evidence-based positions to policymakers.

Industry also invests significantly in research that can be a useful input to policy development, for example the ABCL has commissioned a number of studies to assist in updating dietary advice on the consumption of beverages and their role in the diet.

The ABCL commissioned the CSIRO to carry out a secondary analysis of the National Nutrition and Physical Activity Survey (NNPAS) ¹⁰, which demonstrated that removing juice from our diets is likely to compromise total fruit intake. The analysis conducted by the CSIRO provided clear indication on the role of fruit juice in the diet and the relatively small contribution it has to total energy and sugar intake – about 1 per cent of energy and 3.5 per cent of sugar across the population. This piece of research was insightful in alleviating some consumer confusion about the role of juice in their diet as half a cup is recommended as an occasional replacement for one serve of whole fruit in the ADG. This was further reinforced by FSANZ, which recognised the role vitamin C plays in normal growth and development in children by allowing this health benefit to be claimed on packages of foods that are a good source of vitamin C, in accordance with Schedule 4 of the Food Standard Code.

¹⁰ Hendrie G, Baird D, Syrette J, Barnes M, Rily M. Consumption of non-dairy, non-alcoholic beverages in the Australian population: A secondary analysis of the Australian National Nutrition and Physical Activity Survey (NNPAS) 2011-12. Australia: CSIRO; 2015.

Another valuable piece of research commissioned by the ABCL was [22-year longitudinal analysis](#) of water-based beverage sales trends in Australia¹¹. A summary of the findings is below:

- The study found a 30 per cent decrease in per capita sugar contribution from non-alcoholic water-based beverages over the 22-year period (1997-2018), which is equivalent to a reduction in 32 teaspoons or 127 grams of sugar per person, per year.
- In 1997, Australians consumed 83 litres of sugar-sweetened drinks per person per annum compared to 61 litres per person per annum in 2018. In contrast, 88 litres of no- and low-sugar choices, such as plain and sparkling water and sugar-free drinks, were consumed per capita in 2018.
- Evidence of a major change in what Australians are drinking can also be found in bottled and packaged water which now outsells sugar-sweetened carbonated soft drinks, and 59 per cent of water-based drinks consumed are low- or no-sugar, compared to just 36 per cent in 1997.
- Volume sales of still and sparkling unflavoured water have more than quadrupled, from 12 litres per person, per annum (1997) to 54 litres per person per annum (2018) indicating the drinks industry is driving change in consumption that is aligned with public health goals by offering additional healthier options, more of the time.
- 64 per cent of drinks in the fridge in 1997 were sugar-sweetened drinks with the remaining 36 per cent made up by non-sugar options. Today, 59 per cent of drinks are non-sugar drinks and 41 per cent are sugar-sweetened.
- The research demonstrates an important shift in consumer behaviour which is in line with the Australian Dietary Guidelines and the industry's efforts to encourage healthier lifestyles, including the Sugar Reduction Pledge to reduce sugar across the industry's portfolio by 20 per cent by 2025.

These findings indicate that there are factors other than increased energy intakes that are impacting the rise in obesity. It also suggests that current initiatives are working to support preventive health and highlights the need for more recent baseline data to be considered in effectively setting targets for the Strategy.

Monitoring and surveillance

ABCL Response: Supports appropriate governance mechanism to support monitoring and surveillance of the Strategy.

It is appropriate for a long-term orientated Strategy to be continuously monitored and periodically reviewed to ensure it reflects current scientific research.

The ABCL supports the need for the Strategy to be reviewed and seeks such a review to be carried out at least every five years to ensure relevant elements of the Strategy align with the ADG and the latest evidence, including dietary surveys and consumer research.

Aligned with a recommendation to update the ADG, the ABCL recommends funding for regular National Nutrition and Physical Activity Surveys to ensure policymaking is based on up-to-date

¹¹ Shrapnel, W.S & Butcher, B.E. Sales of Sugar-sweetened Beverages in Australia: A Trend Analysis from 1997 to 2018. *Nutrients* (2020).

consumer behaviour including food and drink consumption, nutrient intakes and dietary trends. We note the last comprehensive survey took place in 2011-12 and policymakers are currently making policy decisions based on this outdated data.

In order to develop accurate evidence-based policy, it is important that the Federal Government, through the Australian Bureau of Statistics, conducts regular surveys of the Australian population to estimate current food and nutrient intakes, and changes over time.

In a similar manner to the United States' National Health and Nutrition Examination Survey (NHANES), we recommend funding be allocated for National Nutrition and Physical Activity Surveys of all Australians aged 2+ years every three to five years. Currently, the National Nutrition Survey is carried out in Australia on a sporadic basis. As other stakeholders have noted, to complement this research, it would be worthwhile reinstituting the collection of Australian Bureau of Statistics Apparent Consumption data for all core commodities.

Do you agree with the policy achievements of the enablers?

Leadership, governance and funding

ABCL Response:

The ABCL supports the sustainable funding of health promotion activities through an ongoing, long-term prevention fund to ensure health action is adequate all year round and for emergency and non-emergency situations. The ABCL also supports the steering of the prevention fund is led by a strong governance mechanism.

Partnerships & Community Engagement

ABCL Response: Supports innovative partnerships with public health, government, industry and within communities to drive policy change.

The ABCL strongly supports the inclusion of partnerships in the implementation of the Strategy as with any public health policy, multi-sectorial action is developed with industry stakeholders through an extensive engagement process. The ABCL has been involved with other long-term strategies, including the successful Health Star Rating system and the Healthy Food Partnership, which is currently achieving effective outcomes in providing Australians with informed choice to support their dietary needs.

The ABCL supports innovative partnerships to ensure shared decision making, including strong partnerships within communities to drive policy change that is supported by all stakeholders. The ABCL continues to voice its support for any strategy or change in policy that is supported by a robust evidence-based approach and delivered through a transparent stakeholder process.

Information and health literacy

ABCL Response: Supports the development of a national platform and health literacy strategy that involves consultation with industry and is reflective of current and sound evidence.

The ABCL supports the development of a national platform that provides credible, evidence-based health information as a means to easily inform Australians. The ABCL is also supportive of ensuring information and initiatives are culturally appropriate and delivered in a manner that considers the needs of those who have English as their second language.

The ABCL reiterates the importance of continuous monitoring of scientific research and surveys to ensure health information literacy is reflective of best evidence and current to the dietary needs of Australians. The ABCL also supports the development of national health literacy strategy that involves consultation with experts across government and the food and beverages industry.

Research and evaluation

ABCL Response: Supports the current policy decision-making framework involving policy experts supported by high quality scientific research.

The ABCL supports the continuous monitoring of emerging research and consideration in periodically reviewing the Strategy in meeting its objectives. The ABCL recognises the need for stronger collaboration between government and researchers, however, supports its current framework that policy decisions are made by policy experts based on the scientific evidence that is reviewed and communicated by researchers. It is also important that researchers, academics, public health stakeholders and industry representatives are provided with appropriate channels to advocate evidence-based positions to policymakers.

The ABCL therefore supports the establishment of bidirectional partnerships between policy makers and researchers to enable the development of evidence-informed policy. It is the view of the ABCL that greater emphasis is required on the collaborative partnerships between policy makers, researchers, healthcare professionals and industry in the development of national guidelines and translation of evidence to consumers.

Monitoring and surveillance

ABCL Response: Supports appropriate governance mechanism to underpin a monitoring and surveillance framework of the Strategy and regular updates to national data sets.

It is appropriate for a long-term orientated Strategy to be continuously monitored and periodically reviewed to ensure it reflects current scientific research. The ABCL supports the need for the Strategy to be reviewed and seeks such a review to be carried out at least every five years to ensure relevant elements of the Strategy align with the Australian Dietary Guidelines and the latest evidence, including dietary surveys and consumer research.

The ABCL notes the proposal in the Strategy of regular publishing of national data sets. The ABCL recommends regular publishing of National Nutrition and Physical Activity surveys in recognition that consumption and nutrient intake patterns change much more frequently than the 10-year lapse since the last nutrition survey (2011-2012).

In order to develop accurate evidence-based policy, it is important that the Federal Government, through the Australian Bureau of Statistics, conducts regular surveys of the Australian population to estimate current food and nutrient intakes, and changes over time.

In a similar manner to the United States' National Health and Nutrition Examination Survey (NHANES), we recommend funding be allocated for National Nutrition and Physical Activity Surveys of all Australians aged 2+ years every three to five years. Currently, the National Nutrition Survey is carried out in Australia on a sporadic basis. As other stakeholders have noted, to compliment this research, it would be worthwhile reinstituting the collection of Australian Bureau of Statistics Apparent Consumption data for all core commodities.

8. FOCUS AREAS

Do you agree with the 7 focus areas?

ABCL response:

The ABCL will only be providing comments relative to Focus Area 2: Improving access to and the consumption of a healthy diet.

The ABCL supports the overarching principle of this focus area, that is, to ensure children and adults have the best chance at living a healthy, longer life by providing them with informed and broader choice of healthy foods.

The ABCL recognises the significant role accessibility to healthy food and drink has on Australian's health and that there is a need for a multi-sectoral collaboration to drive further change. It is understood that the development of the policy achievements proposed will assist in achieving the targets for this focus area. However, it is unclear of the role of multi-sectoral collaborators to help achieve these targets. The non-alcoholic beverage industry is already committed to government-led initiatives such as the Health Star Rating and the Healthy Food Partnership's Reformulation Program, and its own voluntary initiatives like the Sugar Reduction Pledge, to improve the health of Australia's that align with the goals and vision of this Strategy. It is the position of the ABCL that the Strategy consider these existing and planned multi-sectoral partnerships and initiatives through which industry is achieving effective outcomes, rather than introduce new initiatives that will be onerous on industry to commit to. The ABCL recommends that the Strategy details the actions under this proposed focus area and level of involvement of partners to help achieve the proposed targets.

Do you agree with the targets for these focus areas?

Focus Area 2 - Improving access to and the consumption of a healthy diet targets

ABCL response to targets:

The ABCL supports the overarching principle of each of these targets, that is, to ensure children and adults have the best chance at living a healthy, longer life. The ABCL recognises the significant role accessibility to healthy food and drink has on Australian's health and that there is a need for a multi-sectoral collaboration to drive further change.

The ABCL recommends that the Strategy considers a whole-of-diet approach in setting targets rather than focusing on individual nutrients, as other stakeholders have suggested in the review of the Australian Dietary Guidelines (2013).

The ABCL also recommends that the targets are broadened to include whole foods beyond fruit and vegetables, as part of the 'whole-of-diet' lens.

It is understood that the development of the policy achievements proposed will assist in achieving the targets for this focus area. However, it is unclear of the role of multi-sectoral collaborators to help achieve these targets. The non-alcoholic beverage industry is already committed to government-led initiatives such as the Health Star Rating and the Healthy Food Partnership's Reformulation Program, and industry-led voluntary initiatives like the Sugar Reduction Pledge, to improve the health of Australians and align with the goals and vision of this Strategy. It is the position of the ABCL that the Strategy consider these existing and planned multi-sectoral partnerships and initiatives in establishing targets for this focus area rather than introduce new initiatives that will be onerous on industry to commit to. The ABCL recommends that the Strategy details the actions under this proposed focus area and level of involvement of partners to help achieve the proposed targets.

The ABCL strongly recommends that targets and policy achievements are underpinned by current evidence on consumption trends and dietary patterns from a range of sources.

A valuable piece of research that should be considered is the [22-year longitudinal analysis](#) of water-based beverage sales trends in Australia¹². A summary of the findings is below:

- The study found a 30 per cent decrease in per capita sugar contribution from non-alcoholic water-based beverages over the 22-year period (1997-2018), which is equivalent to a reduction in 32 teaspoons or 127 grams of sugar per person, per year.
- In 1997, Australians consumed 83 litres of sugar-sweetened drinks per person per annum compared to 61 litres per person per annum in 2018. In contrast, 88 litres of no- and low-sugar choices, such as plain and sparkling water and sugar-free drinks, were consumed per capita in 2018.
- Evidence of a major change in what Australians are drinking can also be found in bottled and packaged water which now outsells sugar-sweetened carbonated soft drinks, and 59 per cent of water-based drinks consumed are low- or no-sugar, compared to just 36 per cent in 1997.
- Volume sales of still and sparkling unflavoured water have more than quadrupled, from 12 litres per person, per annum (1997) to 54 litres per person per annum (2018) indicating the drinks industry is driving change in consumption that is aligned with public health goals by offering additional healthier options, more of the time.
- 64 per cent of drinks in the fridge in 1997 were sugar-sweetened drinks with the remaining 36 per cent made up by non-sugar options. Today, 59 per cent of drinks are non-sugar drinks and 41 per cent are sugar-sweetened.
- The research demonstrates an important shift in consumer behaviour which is in line with the Australian Dietary Guidelines and the industry's efforts to encourage healthier lifestyles, including the Sugar Reduction Pledge to reduce sugar across the industry's portfolio by 20 per cent 2025.

This study clearly indicates that there are other factors than increased energy intakes that are impacting the rise in obesity and that current initiatives from the beverages industry are working to support preventive health.

¹² Shrapnel, W.S & Butcher, B.E. Sales of Sugar-sweetened Beverages in Australia: A Trend Analysis from 1997 to 2018. *Nutrients* (2020).

Sugar Reduction Pledge

The non-alcoholic beverage industry's Sugar Reduction Pledge is an example of a successful voluntary initiative that is achieving effective change:

- The Pledge is an industry commitment to reduce sugar across the industry's portfolio by 20 per cent by 2025. Progress towards targets is independently measured.
- The latest progress report, released in October 2020¹³, demonstrated significant progress towards the 2025 target, with a 12 per cent reduction in sugar across 2015 – 2020 (first half).
- This significant progress demonstrates the effectiveness of actions being taken by pledge signatories, including product reformulation (reducing sugar content of existing products), smaller pack sizes, product innovation (creating new lower or no sugar drinks) and innovative marketing to drive behaviour change towards no- and low-sugar options.
- These actions not only reflect changing consumption trends but also serve to shift purchasing behaviour and reinforce a continued commitment by industry to reduce sugar content.
- In addition to pledge signatories, the Pledge contains a supporter tier for beverage companies that can commit to a range of other initiatives in support of the Pledge's overarching objective to help people choose a drink with less, low or no sugar as a way to supporting a healthy lifestyle.
- Supporter Members will undertake a range of measurable activities which will be subject to rigorous and regular review, including but not limited to: reformulation, increasing volume sales of low and no- sugar varieties, introducing smaller pack sizes, a cap in sugar content on all existing drinks brands and promoting consumption of bottled water by young Australians as the preferred choice over other beverages.

The ABCL recommends that the Strategy recognises existing voluntary initiatives pledged by the beverage industry that is achieving sustainable and effective outcomes in improving accessibility to healthy choices for Australians.

Do you agree with the policy achievements for this focus area?

In careful consideration of the proposed policy achievements for improving access to and the consumption of a healthy diet, the ABCL requests that the following points are strongly considered in the development of the final Strategy:

- **Development of policy documents and translation of scientific evidence for communication and education campaigns involve a transparent stakeholder engagement process**

The ABCL requests further clarity on what a 'national policy document' for nutrition and food action will encompass and the proposed stakeholder engagement process involved in the development of this document. The ABCL strongly recommends a transparent stakeholder engagement process and extensive consultation to ensure this policy document is reflective of best practice and current scientific evidence.

The ABCL supports the provision of nutrition information and guidance that is easily translated for all health literacy levels and has been developed through a stakeholder engagement process

¹³ [Australian non-alcoholic drinks industry Sugar Reduction Pledge second progress report 2020](#)

to ensure best, current and peer-reviewed evidence is used to support. This same principle applies to any communication and social media marketing strategies used to communicate the Australian Dietary Guidelines.

- **Exposure to unhealthy food and drink marketing for children is already restricted, including through digital media**

The industry has established and complies with self-regulatory initiatives to address food and drink marketing for children including ABCLs Responsible Marketing Code, which restricts advertising to anyone under 15, including traditional and digital mediums. Additionally, the Australian Association of National Advertisers (AANA) [Food and Beverages Advertising Code](#) review has seen the inclusion of the Responsible Children's Marketing Initiative (RCMI). The AANA last year took responsibility for the RCMI and is currently updating its [F&B Code](#) as part of advertising and marketing self-regulation. The object of this Code is to ensure that advertisers and marketers develop and maintain a high sense of social responsibility in advertising and marketing food and beverage products in Australia.

The RCMI is a voluntary commitment by food and beverage companies on the marketing of food to children and represents a very successful self-regulatory approach. Extending beyond television, it also applies to print media, radio, cinema, interactive games and the internet. The initiative includes fully independent complaints handling through Ad Standards Compliance is monitored and reported annually.

The ABCL acknowledges that international examples of advertising bans and restrictions have not impacted obesity levels¹⁴ and reiterates the findings from the McKinsey Global Institute's *Overcoming Obesity: An initial economic analysis*¹⁵ which identified interventions like portion control, reformulation and availability of energy dense products as the most impactful interventions ahead of media restrictions and taxes.

The ABCL has reviewed the AANA's submission to this consultation and supports its position of maintaining a self-regulatory system of controlling advertising and marketing communication in Australia.

- **Restricted promotion of unhealthy food and drinks at point of sale and at the end-of-aisle in prominent food retail environments, and increased promotion of healthy food options**

The ABCL is aware of some Australian retailers implementing strategies to address the food environment within store such as:

- new store formats with a focus on fresh and healthy food by increasing space stores for fresh fruit and vegetables and more shelf space allocated to dedicated health aisles.
- shopping website displaying nutrition information and the health star rating where applicable.
- consumer education about new, affordable and in-season produce.

¹⁴ Ashton A. Food advertising and childhood obesity. *JRSoc Med.* 2004 Feb; 97 (2):51-52. Available from: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1079287/>

¹⁵ McKinsey Global Institute (2014). *Overcoming obesity: an initial economic analysis*

Price promotions occur across a range of food and drink categories including the core five food groups and discretionary foods in the retail setting. While promotions may influence a customer's decision to purchase, there is no evidence that these marketing activities are associated with a health outcome such as overweight and obesity. The ABCL is not aware of evidence-based research which demonstrates an association of price promotion restriction and impact on changing dietary patterns and weight status.

A restriction of promotion of certain food and drink categories would require a clear definition and criteria of those food and drink items that the restriction applies, which is challenging from a nutritional perspective as well as from a practical implementation and monitoring perspective. Any restriction of this nature may have implications that would require clarification of Australian competition and consumer law.

The ABCL does not support restricting promotions of food and drinks in the absence of evidence-based research demonstrating a health outcome in relation to weight status and would require careful design and monitoring of its effectiveness.

- **Consumer choice is guided by HSR which is displayed on all multi-ingredient packaged food products**

The ABCL supports the HSR system as a tool of empowerment for consumers to make informed decisions how they can consume a healthy diet. The ABCL strongly recommends that the any policy achievements proposed to encourage industry to reformulate be aligned with the uptake targets of the HSR, as noted on the [HSR website](#):

The following targets have been set to measure the success of the Health Star Rating system across a five-year period (commencing on 15 November 2020).

- *Interim target 1 (at three years) - 50% of intended products have applied the Health Star Rating system by 14 November 2023.*
- *Interim target 2 (at four years) - 60% of intended products have applied the Health Star Rating system by 14 November 2024.*
- *Final target (at five years) – 70% of intended products have applied the Health Star Rating system by 14 November 2025.*

- **Reduced sugar, saturated fat and sodium content of relevant packaged and processed foods through reformulation and serving size reduction**

The ABCL does not support mandated reformulation for beverages, as peer-reviewed data ¹⁶ already shows consumers have been choosing low and no sugar drinks and plain for a number of years, and industry has created a wider range of these products to encourage healthier consumption. In addition, there is also demonstrable success of voluntary initiatives i.e., the beverage industry's Sugar Reduction Pledge, to reduce sugar across the non-alcoholic beverage industry through a range of portfolio renovation levers.

The Pledge is an industry commitment to reduce sugar across the industry's portfolio by 20 per cent by 2025. Progress towards targets is independently measured.

¹⁶ Shrapnel, W.S & Butcher, B.E. Sales of Sugar-sweetened Beverages in Australia: A Trend Analysis from 1997 to 2018. *Nutrients* (2020).

The [latest progress report](#), released in October 2020¹⁷, demonstrated significant progress towards the 2025 target, boasting a 12 per cent reduction in sugar across 2015 – 2020 (first half).

This significant progress demonstrates the effectiveness of actions being taken by pledge signatories, including product reformulation (reducing sugar content of existing products), smaller pack sizes, product innovation (creating new lower or no sugar drinks) and innovative marketing to drive behaviour change towards no- and low-sugar options.

These actions not only reflect changing consumption trends but also serve to shift purchasing behaviour and reinforce a continued commitment by industry to reduce sugar content.

In addition to pledge signatories, the Pledge contains a supporter tier for beverage companies that can commit to a range of other initiatives in support of the Pledge's overarching objective to help people choose a drink with less, low or no sugar as a way to supporting a healthy lifestyle.

Supporter Members will undertake a range of measurable activities which will be subject to rigorous and regular review, including but not limited to: reformulation, increasing volume sales of low and no- sugar varieties, introducing smaller pack sizes, a cap in sugar content on all existing drinks brands and promoting consumption of bottled water by young Australians.

- **Relevant guidelines and policies are regularly updated using latest scientific evidence**

The ABCL supports the continuous monitoring of emerging research to ensure relevant guidelines and policy documents are current and reflect current best evidence.

The ABCL supports the need for the Strategy to be reviewed and seeks such a review to be carried out at least every five years to ensure relevant elements of the Strategy align with the Australian Dietary Guidelines and the latest evidence, including dietary surveys and consumer research.

The ABCL notes the proposal in the Strategy of regular publishing of national data sets. The ABCL recommends regular publishing of National Nutrition and Physical Activity surveys in recognition that consumption and nutrient intake patterns change much more frequently than the 10-year lapse since the last nutrition survey (2011-2012).

In order to develop accurate evidence-based policy, it is important that the Federal Government, through the Australian Bureau of Statistics, conducts regular surveys of the Australian population to estimate current food and nutrient intakes, and changes over time.

- **The nutritional and health needs of priority populations are met through co-designed, community-based programs that are culturally appropriate**

The ABCL supports an integrated and multi-sectoral approach to establishing culturally appropriate community-based programs to meet the nutritional and health needs of priority populations. The ABCL strongly recommends that industry representatives participate in the steering committees of such programs to educate communities on industry efforts to meet the dietary needs of Australians and encourage acceptance of initiatives and tools like the Health Star Rating scheme as a means of informing choice.

¹⁷ [Australian non-alcoholic drinks industry Sugar Reduction Pledge second progress report 2020](#)

9. CONTINUING STRONG FOUNDATIONS

The ABCL strongly supports the inclusion of actions to further strengthen the already existing frameworks and strategies in place and supported by stakeholders to improve the health of Australians. As referenced throughout this submission, the goals of this Strategy align with those goals of other existing strategies developed by government and NGOs and the ABCL supports that the strategy framework seeks to improve on the current action taking place in the prevention system.

The ABCL supports improved coordination between similarly focussed strategies and initiatives and recognition of the significant voluntary work industry is undertaking to improve the health of Australians.

The ABCL welcomes working collaboratively with multiple stakeholders including government, health organisations and food industry to help improve and encourage preventive health to better the lives of Australians.