



Draft Australian National Preventive Health Strategy

Doctors For Nutrition submission • April 2021

The Minister for Health announced in June 2019 that the Australian Government would develop a National Preventive Health Strategy (the Strategy). The Strategy is part of Australia's Long Term National Health Plan.

The Strategy aims to help Australians improve their health at all stages of life, through early intervention, better information, targeting risk factors and addressing the broader causes of poor health and wellbeing. It intends to provide the overarching, long-term approach to prevention in Australia by working to build systemic change to ensure the best outcomes for all Australians.

During April 2021 stakeholder and community feedback was sought on the draft Strategy. It is anticipated that the final Strategy will be launched in mid-2021.

Doctors for Nutrition applauds the intentions and objectives of the draft, although there were areas we hope will be improved upon in the final Strategy, set out in our submission below. First and foremost we look forward to seeing a much stronger focus on the undeniable connection between diet and our environment, particularly in regards to the consumption of animal-sourced foods.

The submission called for feedback on specific parts of the draft Strategy. To provide context to our responses, the full draft strategy is available [here](#).

Doctors For Nutrition's response

VISION

Do you agree with the vision of the Strategy on page 8? Please explain your selection.

Strongly agree.

Preventative health is at the core of Doctor For Nutrition's own vision for a society and healthcare system that embraces evidence-based nutrition solutions to help people optimise their health and quality of life.

Identifying and providing effective early education and support across all areas of health and wellbeing is critical to our country continuing to prosper.

AIMS

The Strategy outlines four high-level aims. Each aim includes a measurable target/s in order to track the Strategy's progress in achieving the vision. The aims and targets are outlined on page 8.

Do you agree with the aims and their associated targets for the Strategy? Please explain your selection.

Agree.

The targets seem suitably ambitious, although without a detailed action plan that clarifies how these targets will be implemented and evaluated, it is difficult to determine if they are achievable, particularly given the noted complexities of the Strategy touching all parts of society (including some that may have conflicting interests i.e. the commercial sector). We look forward to seeing the new/revised policies to clarify timelines and responsibilities for implementation, reporting and evaluation, as well as the ability to rally non-government organisations and communities.

We are particularly pleased to see the significant increase in investment in preventative health, bringing us much more in-line with Canada and the United Kingdom.¹

¹ OECD Health expenditure and financing.
<https://stats.oecd.org/Index.aspx?DataSetCode=SHA#>

PRINCIPLES

Six principles are included in the Strategy to underpin the Framework for Action by 2030. The principles are designed to guide implementation and strengthen current efforts. They are outlined on page 8.

Do you agree with the principles? Please explain your selection.

Strongly agree.

Enabling the workforce is absolutely key to delivery of the vision.

As an independent health promotion charity advocating for evidence-based nutrition in healthcare, we are regularly exposed to the lack of training and education many health professionals receive in regards to nutrition.

Globally, poor diet is the leading preventable risk factor contributing to the burden of chronic disease (a suboptimal diet has been found to be responsible for more deaths than any other risks globally).² The Strategy recognises that 'a nutritious diet is one of the most influential factors contributing to our overall health and wellbeing'. Thus, highlighting nutrition must be a key area of focus for preventive health.

A systematic review published in *The Lancet* in 2019 investigated the nutrition education provided to medical students across the world, including New Zealand and Australia.³ Regardless of country, setting, or year of medical education it came to the clear conclusion that sufficient nutrition training in medical school is missing. Most students walk away with little ability or confidence to guide patients towards a healthy diet. This must be rectified for the Strategy to succeed.

ENABLERS

Mobilising a prevention system is a key driver in achieving systemic change and better health outcomes for all Australians. Seven system enablers are identified in the Strategy that are critical to creating a more effective and integrated prevention system for Australia over the next 10 years. Each enabler is

² GBD 2017 Diet Collaborators. Health effects of dietary risks in 195 countries, 1990-2017: a systematic analysis for the Global Burden of Disease Study 2017. *Lancet*. 2019;393(10184):1958-1972. [doi:10.1016/S0140-6736\(19\)30041-8](https://doi.org/10.1016/S0140-6736(19)30041-8)

³ Crowley, Ball & Hiddink. (2019) Nutrition in medical education: a systematic review, *The Lancet Planetary Health*, Volume 3, Issue 9. [doi:10.1016/S2542-5196\(19\)30171-8](https://doi.org/10.1016/S2542-5196(19)30171-8).

accompanied by desired policy achievements by 2030. The enablers and the policy achievements are outlined in more detail on pages 31-42.

Do you agree with the enablers? Please explain your selection.

Agree.

4. INFORMATION AND HEALTH LITERACY

We are pleased to see acknowledgement that information and health literacy is not solely about consumers.

As touched on above, healthcare professionals (with the exception of dietitians) do not currently receive sufficient education on nutrition, leaving them unprepared to support patients in changing their diet to address diet-related diseases⁴ and to make environmentally sustainable food choices. In addition there is an inadequate number of Accredited Practising Dietitians (APDs) in the public sector and service access in the private sector can be limited due to cost constraints.

The Strategy outlines that the ambition of a ‘wellness system’ is extremely broad-reaching and may include the management of nutrition, sleep, mood states, oral and auditory health etc. Traditionally this would require the input of numerous specialists; however the new generation of graduates from multidisciplinary allied-health vocational programs at several universities will change this.⁵ This demonstrates the importance of an adaptable and nimble healthcare professional education system. More focus is required to achieve the desired outcome.

7. PREPAREDNESS

The recognition of climate change as one of the biggest challenges to health, wellbeing and economic prosperity is welcome; however only addressing climate change through a preparedness lens misses the point that mitigation (i.e. rapidly reducing the drivers of climate change) is the central priority, while we prepare for and adapt to impacts that are now unavoidable. There must be actions to address climate-related health risks set out under each of the seven ‘enablers’ in the Strategy, together with funded programs to ensure their delivery.

⁴16. 2020 Global Nutrition Report. Global Nutrition Report: Action on equity to end malnutrition. Bristol, UK: Development Initiatives. Published online.

globalnutritionreport.org/reports/2020-global-nutrition-report/

⁵ Egger, Binns & Rossner. (2009) The emergence of “lifestyle medicine” as a structured approach for management of chronic disease. MJA,190(3).

mja.com.au/system/files/issues/190_03_020209/egg10622_fm.pdf

Healthcare professionals have a responsibility to advocate for a food system with health, equity, viability and ecological sustainability as key outcomes and promote a shift towards nutritious, largely plant-based dietary patterns as a matter of priority. By doing so, we have the opportunity to promote healthier eating patterns and make significant and rapid strides towards the goal of securing a safe climate and ecological integrity to protect and promote human health for both current and future generations.

Do you agree with the policy achievements for the enablers?

Doctors For Nutrition would be interested in understanding the timeline for the national strategic plan addressing the environmental health challenges. As the United Nations Deputy Secretary-General Amina Mohammed spelled out at the Climate and Development Ministerial Meeting recently: “We now need to spare no effort to achieve it in this ‘make-or-break year’”.⁶

The ‘policy achievements by 2030’ do not convey a strong sense of urgency about the climate crisis and how it will undermine all other efforts in health prevention without urgent action.

FOCUS AREAS

The Strategy identifies seven focus areas, where a stronger and better-coordinated effort will enable accelerated gains in health, particularly for communities experiencing an unfair burden of disease. These focus areas have been identified to boost prevention action in the first years of the Strategy and to impact health outcomes across all stages of life. Specific targets and desired policy achievements are also identified for each focus area. The focus areas are outlined in more detail on pages 43-65.

Do you agree with the seven focus areas? Please explain your selection.

Agree.

2. IMPROVING ACCESS TO AND THE CONSUMPTION OF A HEALTHY DIET

We would like to see this focus area have a stronger emphasis on the reduction of animal sourced-foods in the Australian diet both to address the burden of disease

⁶ United Nations. UN News: More climate action needed during ‘make-or-break year’ for people and planet. <https://news.un.org/en/story/2021/03/1088792>

and safeguard environmental sustainability. Mention is briefly made of the high intake of red meat and processed meat, but this needs far greater attention, including clear and ambitious targets.

Overconsumption of animal-sourced and processed foods⁷, and corresponding low intake of whole plant foods⁸ is driving an escalating chronic disease crisis in Australia. If our population shifted to a more plant-based dietary pattern thousands of human deaths could be avoided each year, with a corresponding reduction in cases of chronic conditions such as heart disease, cancer, diabetes and obesity.⁹ Reducing demand for animal protein is also essential to reducing the public health threats of communicable zoonotic disease emergence¹⁰ and antimicrobial resistance.¹¹

As well as protecting individual and public health, plant-based dietary shift is an essential prerequisite to stepping back from many of the environmental tipping points and planetary boundaries that we are currently approaching or exceeding.^{12 13} Recent modelling has shown that, even with full adherence to the current Australian Dietary Guidelines, Australia would fall short of global targets on climate change and land use change, as well as the sustainable development goals and planetary boundaries related to freshwater use and nitrogen pollution. In fact, the only dietary patterns compatible with the Paris Agreement climate change targets were the

⁷ Our per capita consumption of meat and dairy is 110 kg and 219 kg per year, significantly exceeding the global averages of 43 kg and 90 kg respectively: Ritchie H 2017. Meat and Dairy Production, based on 2017 data from FAOSTAT. Retrieved from

ourworldindata.org/grapher/meat-consumption-vs-gdp-per-capita?country=~AUS and ourworldindata.org/grapher/per-capita-milk-consumption?tab=table&time=1961..latest

⁸ Only 5% of Australians have an inadequate daily intake of vegetables: Fetherston H, Calder R and Harris B, 2019. Australia's Health Tracker 2019, Mitchell Institute, Victoria University. Melbourne

⁹ Australian Institute of Health and Welfare 2020. Australia's health 2020 data insights.

Australia's health series no. 17. Cat. no. AUS 231. Canberra: AIHW

aihw.gov.au/reports/australias-health/australias-health-2020-data-insights/contents/summary

¹⁰ United Nations Environment Programme and International Livestock Research Institute (2020). [Preventing the Next Pandemic: Zoonotic diseases and how to break the chain of transmission](#). Nairobi, Kenya

¹¹ ProVeg e.V. (2020): Food & Pandemics Report: Part 1 - Making the Connection: Animal-Based Food Systems and Pandemics. Report. Berlin

¹² Poore J, Nemecek T. Reducing food's environmental impacts through producers and consumers. *Science* 2018;360:987-92. [doi:10.1126/science.aag0216](https://doi.org/10.1126/science.aag0216)

¹³ Willett W, Rockström J, Loken B, et al. Food in the Anthropocene: the EAT-Lancet Commission on healthy diets from sustainable food systems. *Lancet*. 2019;393(10170):447-492. [doi:10.1016/S0140-6736\(18\)31788-4](https://doi.org/10.1016/S0140-6736(18)31788-4)

plant-centric ones, with fully plant-based (vegan) diets performing the most favourably.¹⁴

We welcome food and nutrition policies and programs that consider environmental health, climate change and human health, including emerging health threats; this includes developing a comprehensive national food and nutrition policy, and further integration of sustainability within the soon-to-be updated Australian Dietary Guidelines. For these policies and programs to be comprehensive they must include a shift towards plant-centric diets.

Do you agree with the targets for the focus areas?

For the reasons noted above we would like to see the inclusion of a target to reduce the overconsumption of animal-sourced foods, allowing more energy intake from fruit and vegetables as suggested.

Do you agree with the policy achievements for the focus areas?

We strongly support the need for a communication and marketing strategy to support effective implementation of the Australian Dietary Guidelines. For example, consideration must be given to helping consumers translate the Australian Guide to Healthy Eating diagram to weekly meals and provide deeper insight into healthy, affordable options.¹⁵

An update of the guidelines once every ten years is not sufficient to keep up with trends and evidence as it evolves. This should also be considered as part of policy achievements.

Healthcare professionals must be educated on knowledge translation and dissemination strategies to support the uptake of Australian Dietary Guidelines into practice. These activities may include the development and evaluation of decision support tools, training modules, continuing medical education, and workshops for health and allied health professionals. Research on the effectiveness of dissemination, implementation, and evaluation strategies is an important part of measuring the impact.

¹⁴ Springmann M, Spajic L, Clark MA, et al. The healthiness and sustainability of national and global food based dietary guidelines: modelling study. *BMJ* 2020; 370:m2322.

¹⁵ Wijesinha-Bettoni R, Khosravi A, Ramos AI, et al. A snapshot of food-based dietary guidelines implementation in selected countries. *Global Food Security*. 2021;29:100533. [doi:10.1016/j.gfs.2021.100533](https://doi.org/10.1016/j.gfs.2021.100533)

CONTINUING STRONG FOUNDATIONS

There are many effective and well-designed prevention-based programs and strategies developed by government, non-government organisations and communities that are currently in progress. This element of the Framework for Action acknowledges the immense activity that is already under way to better prevent illness and disease in Australia. It is outlined further on page 66

Do you agree with this section of the Strategy? Please explain your selection.

Agree.

In addition to acknowledgement of these existing efforts, it is critical that they are supported at both a federal and state level with a clear leader to guide the long-term implementation.

FEEDBACK

Please provide any additional comments you have on the draft Strategy.

Doctors For Nutrition believes that the National Preventive Health Strategy holds great promise for proactively supporting all Australians to enjoy and maintain good health and wellbeing. We look forward to the final document and further information on its implementation.

We do hope to see a greater focus on the undeniable connection between diet and our environment, including clear messaging and bold action to reduce the consumption of animal-sourced foods and shift our population towards a health-promoting plant-predominant dietary pattern.

We appreciate the opportunity to contribute to this process.