

Response ID ANON-W7Q4-A6VS-K

Submitted to **Healthy Food and Drink Guidance survey**

Submitted on **2019-11-08 17:32:37**

Introduction

1 Are you:

please select your role:

other (please specify)

please answer:

Oraaiao: The New Zealand Climate and Health Council. OraTaiao comprises health professionals in Aotearoa/New Zealand concerned with: The negative impacts of climate change on health. The health gains that are possible through strong, health-centred climate action. Highlighting the impacts of climate change on those who already experience disadvantage or ill-health (equity impacts). Reducing the health sector's contribution to climate change. We are part of a worldwide movement of health professionals and health organisations urgently focusing on the health challenges of climate change and the health opportunities of climate action. The Council is a not-for-profit, politically non-partisan incorporated society.

2 Do you have any comments on the purpose, scope and principles?

please answer:

Purpose: We recommend editing the following sentence to include the words "and environmentally sustainable" - promote and provide healthy and environmentally sustainable food and drink.

We recommend adding a statement

Healthy eating, including increased intake of plant-based foods and less consumption of red meat and animal fat (particularly highly processed animal products), would both help reduce greenhouse gas emissions and lead to significant improvements in health. This also aligns with the targets for New Zealand to have net zero carbon emissions and reduced methane emissions by 2050

Scope:

Under 'The Guidance applies to' we recommend inserting 'nutrition education provided by schools'.

Principles:

Under point 1, we recommend including environmental sustainability as a principle and include a recommendation to reduce meat and dairy. This reflects recent guidance by the NZ Ministry of Health in the report 'Sustainability and the Health Sector'.

Under point 3, we recommend adding fortified milk alternatives e.g. soy milk as a cold drink option. Soy milk is a healthy and environmentally sustainable choice that would help to reduce dairy milk consumption in line with recent Ministry of Health guidance.

We recommend adding that tap water is preferred over bottled water.

Under point 4, we recommend inserting 'This means: healthy plant-based options should be available wherever food is provided.' NZ Healthy Food and Drink Guidance should align with recent Ministry of Health recommendations to reduce meat and dairy.

The Lancet medical journal, in its 2019 EAT-Lancet Commission report, has also called for an urgent shift towards plant-based eating patterns.

We also recommend including consideration of affordability, to ensure that healthy options are accessible to all. Special consideration should be given to equity, as significant barriers exist to accessing healthy foods such as fruit and vegetables for young people from Māori, Pacific Island and/or low socio-economic backgrounds. This is reflected in poorer health outcomes from nutrition-related diseases such as obesity and diabetes.

3 Do you agree with the 3.5 HSR as the cut off to compare healthiness of food and drinks?

select one:

No

Do you have any comments?:

We disagree and advocate for a 4 star health rating.

The health star rating does not include any measurement of the environmental impact of food.

Also, there needs to be some focus on serving size and food wastage as these are other key areas when addressing a food system that is healthy and sustainable.

4 Do you have any suggestions to improve the nutrient criteria for fruit and vegetables?

please answer:

We recommend adding a forward note that fruit and vegetables should make up approximately half of the contents of meals provided.

5 Do you have any suggestions to improve the nutrient criteria for breads, cereals and grains?

please answer:

We recommend adding a forward note that whole grains should make up approximately 50% of the contents of meals provided.

We recommend expanding the list of whole grain names e.g. oats, millet, sorghum, barley, spelt, amaranth.

6 Do you have any suggestions to improve the nutrient criteria for milk and milk products?

please complete:

We recommend including a note at the top of the table highlighting the Ministry of Health's recommendation to reduce dairy (as outlined in the report titled 'Sustainability and the Health Sector'). We recommend specifically encouraging fortified plant-based milks to be provided wherever dairy milks are offered.

We recommend that if dairy foods are offered as part of a balanced diet that they do not exceed 1 serving, as per the EAT Lancet Planetary Health Diet.

7 Do you have any suggestions to improve the nutrient criteria for legumes, nuts, seeds, fish and other seafood, eggs, poultry and red meat?

please answer:

We recommend a clear note at the top of the table highlighting the Ministry of Health's recommendation to reduce meat (as outlined in the report titled 'Sustainability and the Health Sector').

A follow up recommendation to increase offering of legumes would be useful for providers of food in schools who may not be as familiar with this food group.

All processed meats should be in the red category, regardless of health star rating.

We recommend specifying the types of meat that fall under red meat, including beef, lamb, pork and venison.

Hummus or other low salt, fat and sugar legume-based spreads would fall into the green category.

We recommend adding 'nut or seed butters' to the nut/seed category.

We recommend adding a note: *Some schools maintain a "Nut free" policy for children with allergies despite ASCIA advising this is not needed or effective across whole school settings. Children can be allergic to many things and it is impractical to avoid all allergens across lunchboxes. Allergy and anaphylaxis Information for schools and early childhood education/care can be found here: [www.https://www.allergy.org.au/schools-childcare](https://www.allergy.org.au/schools-childcare)

This is an opportunity for schools to bring back this nutrient dense snack option

Fish should come from sustainable sources, however certain types should be avoided due to high levels of mercury.

The EAT Lancet recommendation for eggs is about one and a half a week, however low-income populations with poor diet quality would benefit nutritionally from a higher intake. As such we recommend eggs are in the orange category.

8 Do you have any suggestions to improve the nutrient criteria for mixed meals/ready-to-eat and ready-to-heat meals?

please answer:

We recommend that green mixed meals/ready-to-eat and ready-to-heat meals should contain 100% green items.

Add that sustainable packaging should apply to these meals

9 Do you have any suggestions to improve the nutrient criteria for fats and oils, spreads, sauces, dressings and condiments?

please answer:

We recommend all oils be classified in the orange category, as having them in the green category implies they are a health food and could be used in any amount. Oils should only be used minimally.

Children do not need added salt to be served on the side of meals. Salt should not be in the green category.

10 Do you have any suggestions to improve the nutrient criteria for packaged snack foods?

please answer:

We recommend shifting away from packaged foods as most packaging is bad for the environment and packaged foods generally contain poorer nutrition.

If packaged food must be served, priority should be given to foods in their whole form e.g. dried fruits/unsalted nuts and seeds, and in sustainable, compostable packing.

11 Do you have any suggestions to improve the nutrient criteria for baked items?

please answer:

We suggest including a statement at the start: Baked items are "sometimes" foods therefore they do not need to be on offer everyday in the school or early childhood setting.

12 Do you have any suggestions to improve the nutrient criteria for drinks?

please answer :

We recommend a note at the top of the drinks table highlighting the Ministry of Health's recommendation to reduce dairy (as outlined in the report titled 'Sustainability and the Health Sector').

We recommend specifically encouraging plant-based milks to be provided wherever dairy milks are offered.

We recommend reiterating that tap water should be the main drink on offer (to reduce waste from plastic bottles).

13 What toolkit resources would be helpful to deliver healthy food and drinks?

please answer :

Evidence based resources to help food providers to serve healthy, sustainable plant-based food and drink:

EAT-Lancet healthy, sustainable food brief for everyone.

EAT-Lancet healthy, sustainable food brief for food service professionals.

Eating well: vegan infants and under-5s (2017) First Steps Nutrition Trust.

https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/5a5a4935ec212dd5067a0622/1515866446317/Eating_well_Vegans_Oct_2017_final.pdf

14 Do you have any further other comments?

Please respond :

We encourage the setting of these guidelines to be based on the best current evidence, for the health of children and the environment.

REFERENCES

Ministry of Health. 2019. Sustainability and the Health Sector: A guide to getting started. Wellington: Ministry of Health.

Willett, W., Rockström, J., Loken, B., Springmann, M., Lang, T., Vermeulen, S., et al. (2019). Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. *The Lancet*, 393 (10170), 447-492.

EAT-Lancet Commission (2019b) Brief for Healthcare Professionals. Healthy diets from sustainable food systems
<https://eatforum.org/lancet-commission/healthcare-professionals/>