



Doctors For Nutrition response to the New Zealand Healthy Food and Drink Guidance survey

Doctors For Nutrition submission • October 2019

Doctors For Nutrition is an Australasian health promotion charity led by medical and dietetic professionals from across Australia, New Zealand and globally. Our vision is a society and healthcare system that embraces nutrition solutions to help people optimise their health and quality of life. More information is available at doctorsfornutrition.org.

Below is our response to the New Zealand Ministry of Health's [Healthy Food and Drink Guidance survey](#) in relation to its proposed update to policy on food served in schools, kura, ngā kōhanga reo and early learning services.

Q1 Are you:

NGO

Doctors For Nutrition is an Australasian health-promotion charity led by medical and dietetic professionals dedicated to bringing food back to healthcare.

Q2 Do you have any comments on the purpose, scope and principles?

Purpose:

We recommend inserting: 'Poor nutrition is a leading contributor to the burden of chronic, non-communicable disease in New Zealand. Nurturing healthy eating patterns early can help to ensure that young people from all backgrounds have the best chance of a healthy life'.

Scope:

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



Principles:

Under point 1, we recommend removing red meat as a suggested healthy food. Red meat is categorised as a group two carcinogen by the World Health Organisation, meaning that it probably causes cancer. Nutrients found in red meat, including protein, can be obtained from food sources that are health-promoting, such as legumes, whole grains and vegetables.

Under point 1, we recommend including environmental sustainability as a principle, as well as including 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 soy milk (or other fortified plant-based drinks such as oat 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.

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.

References:

Bouvard, V., Loomis, D., Guyton, K. Z., Grosse, Y., Ghissassi, F. E., Benbrahim-Tallaa, L., Guha, N., Mattock, H. & Straif, K. (2015). Carcinogenicity of consumption of red and processed meat. *The Lancet Oncology*, 16(16), 1599-1600.

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.

Q3 Do you agree with the 3.5 HSR as the cut off to compare healthiness of food and drinks?

No.



Comments: We disagree and advocate for a much higher bar for healthy food policies. Poor nutrition is a leading cause of health loss in Aotearoa New Zealand and to improve health outcomes we should be aiming to serve the healthiest options in schools. Foods should be compared on the documented and evolving evidence of health and environmental sustainability.

The HSR is not based on the bulk of the health evidence which promotes whole plant foods. Instead, the HSR encourages people to select 'healthier' versions of combinations of processed foods rather than whole foods. The HSR does not incorporate a measure of environmental sustainability despite the fact that almost half of New Zealand's greenhouse gas emissions come from agriculture.

The NZ Medical Association has declared climate change a health emergency, and has recommended reducing consumption of red meat and animal fat to help curb emissions. These guidelines are an opportunity to steer Aotearoa New Zealand towards an environment that supports health.

If the HSR continues to be used, a rating of at least 4HSR should be required for foods to be served in schools and a measure for environmental sustainability should also be incorporated. Research undertaken by the George Institute published in April 2018 found there is 86.6% overall alignment with the Australian Dietary Guidelines, with 'FFG foods' (which they recommend to form the basis of a healthy diet) scoring an average HSR of 4. The highest possible standards should be set to create a healthy environment to nurture young bodies and minds.

Nutrition is of critical importance to young people and foods provided should be health promoting and not harmful. Processed and red meat should not be recommended in any form due to their carcinogenic potential (as classified by the World Health Organisation) and their detrimental impacts on the environment.

Special consideration should be given to equity, as significant barriers exist to accessing healthy foods such as fruit and vegetables for young people from Maori, Pacific Island and/or low socio-economic backgrounds. This is reflected in poorer health outcomes from nutrition-related diseases such as obesity and diabetes.

References:

Jones, A, Radholm, K & Neal, B 2018, 'Defining 'Unhealthy': a systematic analysis of alignment between the Australian Dietary Guidelines and the Health Star Rating System', *Nutrients*, vol. 10, no. 501.



Q4 Do you have any suggestions to improve the nutrient criteria for fruit and vegetables?

We recommend adding a forward note that fruit and vegetables should make up approximately 50% of the contents of meals provided.

Q5 Do you have any suggestions to improve the nutrient criteria for breads, cereals and grains?

We recommend adding a forward note that whole grains should make up approximately 25% of the contents of meals provided.

We recommend expanding the list of whole grain names, including grains such as oats, millet, sorghum, barley, spelt and amaranth.

Q6 Do you have any suggestions to improve the nutrient criteria for milk and milk products?

We recommend including a clear 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 plant-based milk to be provided wherever dairy milk is offered.

Cheese is high in saturated fat which is known to increase cholesterol and risk of cardiovascular disease. We recommend that cheese should be classified in the red category.

Q7 Do you have any suggestions to improve the nutrient criteria for legumes, nuts, seeds, fish and other seafood, eggs, poultry and red meat?

We recommend including 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 due to being classified as group one carcinogens (meaning they are known to cause cancer) by the World Health Organisation.

Red meat should be in the red category due to being classified as a group two carcinogen by the World Health Organisation, meaning it probably causes cancer. Aotearoa New Zealand has the second highest rate of cancer in the world, therefore reducing consumption of red and processed meats should be a priority.

We recommend specifying the types of meat that fall under red meat, including beef, lamb, pork and venison. A systematic review and meta-analysis from 19 prospective studies showed a 28% increase in colorectal cancer with an increase in red meat consumption of 120g per day.

Meat consumption is significantly linked with weight gain and Aotearoa New Zealand has an overweight and obesity epidemic, which starts in childhood.

We recommend classifying chicken, fish and eggs in the red category.

Chicken is high in saturated fat, heterocyclic amines and may increase risk of certain cancers.

Fish is a leading source of many toxic pollutants, including mercury. Children are especially vulnerable to exposures to food contaminants, and a balanced diet during these periods is critical for optimal nutritional status and brain development.

Eggs have no dietary fibre and are high in saturated fat and cholesterol. Eggs increase the risk of diabetes and increase the risk of cardiovascular disease for those with diabetes.

Hummus or other legume-based spreads low in salt, fat and sugar should be listed in the green category.

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

References:

Larsson S, Wolk A. (2006). Meat consumption and risk of colorectal cancer: a meta-analysis of prospective studies. *International Journal of Cancer*, 119(11), 2657-2664.

Li Y, Zhou C, Zhou X, & Li L. (2013). Egg consumption and risk of cardiovascular diseases and diabetes: a meta-analysis. *Atherosclerosis*, 229(2), 524-530.



Rohrmann S, Linseisen J, Nöthlings U, et al. Meat and fish consumption and risk of pancreatic cancer: results from the European Prospective Investigation into Cancer and Nutrition. *Int J Cancer*. 2013 Feb 1;132(3):617-24.

Vergnaud A, Norat T, Romaguera D, et al. Meat consumption and prospective weight change in participants of the EPIC-PANACEA study. *Am J Clin Nutr*. 2010 Aug; 92(2):398-407.

Papadopoulou E, Haug L, Sakhi A, et al. Diet as a Source of Exposure to Environmental Contaminants for Pregnant Women and Children from Six European Countries. *Environmental Health Perspectives*. 2019, Vol. 127, No. 10.

Knuppel A, Papier K, Appleby P, Key T, Perez-Cornago A. 2019. Meat intake and cancer risk: prospective analysis in UK biobank. *J Epidemiol Community Health* 2019;73(Suppl 1):A1-A114.

White R, Palumbo C, Yurgelun-Todd D, et al. Functional MRI approach to developmental methylmercury and polychlorinated biphenyl neurotoxicity. *Neurotoxicology* 2011 32(6):975 - 980.

Zeilmaker M, Hoekstra J, van Eijkeren J, et al. Fish consumption during child bearing age: a quantitative risk-benefit analysis on neurodevelopment. *Food Chem Toxicol*. 2013 54:30-34.

Radzevicius L, Ostrauskas R. Egg consumption and the risk of type 2 diabetes mellitus: a case-control study. *Public Health Nutr*. 2012 15(8):1437 - 1441.

Djousse L, Gaziano J, Buring J, Lee I. Egg consumption and risk of type 2 diabetes in men and women. *Diabetes Care* 2009 32(2):295 - 300.

Djousse L, Gaziano J. Egg consumption in relation to cardiovascular disease and mortality: the Physicians' Health Study. *Am. J. Clin. Nutr*. 2008 87(4):964 - 969.

Q8 Do you have any suggestions to improve the nutrient criteria for mixed meals/ready-to-eat and ready-to-heat meals?

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



Q9 Do you have any suggestions to improve the nutrient criteria for fats and oils, spreads, sauces, dressings and condiments?

Oils are 100% fat, are high in caloric density and low in nutrient density. Approximately two thirds of New Zealanders are classified as overweight or obese and addition of refined oils to meals exacerbates this public health issue. We recommend all oils and oil based salad dressings be classified in the red category.

Children do not need added salt to be served with their meals. Salt should not be in the green category.

A 2019 study published in the Lancet entitled 'Health effects of dietary risks in 195 countries, 1990–2017: a systematic analysis for the Global Burden of Disease Study 2017' found that high intake of sodium was the leading dietary risk factor for deaths globally.

Q10 Do you have any suggestions to improve the nutrient criteria for packaged snack foods?

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 and unsalted nuts and seeds, in sustainable, compostable packing.

Q11 Do you have any suggestions to improve the nutrient criteria for baked items?

No.

Q12 Do you have any suggestions to improve the nutrient criteria for drinks?

We recommend including a clear 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 fortified plant-based milks to be provided wherever dairy milks are offered.

We recommend reiterating that tap water should be the main drink on offer.

Q13 What toolkit resources would be helpful to deliver healthy food and drinks?

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

EAT-Lancet healthy, sustainable food briefs for A) everyone and B) food service professionals. <https://eatforum.org/eat-lancet-commission/brief-for-everyone/>
<https://eatforum.org/eat-lancet-commission/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

Physicians Committee For Responsible Medicine Healthy School Food Resources
<https://www.pcrm.org/good-nutrition/healthy-communities/healthy-school-food>

Plant-based food service guide, learning from the One Meal A Day example:
<https://omdfortheplanet.com/plant-based-food-service-guide/>

Q14 Do you have any further comments?

Healthy eating patterns are of critical importance at early stages of life. This guidance has the power to influence lifelong habits and reduce inequitable health outcomes.

Special consideration should be given to equity, as significant barriers exist to accessing healthy foods such as fruit and vegetables for young people from Maori, Pacific Island and/or low socio-economic backgrounds. This is reflected in poorer health outcomes from nutrition-related diseases such as obesity and diabetes.

We recommend encouraging opportunities for young people to be involved with growing and preparing healthy food, to increase children's understanding and awareness of where food comes from and to get them excited about preparing and eating vegetables and fruits. We recommend encouraging organic food where possible.



The potential for health and sustainability gains are immense. We welcome the opportunity to meet to discuss the guidance further, please contact us via hannah@doctorsfornutrition.org to arrange a time.