

**Submission  
No 69**

## **FOOD PRODUCTION AND SUPPLY IN NSW**

**Organisation:** Cancer Council NSW

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28<sup>h</sup> February 2022

Mr Alex Greenwich, MP

Chair, Inquiry into food production and supply in NSW

Legislative Assembly Committee on Environment and Planning

Parliament House  
Macquarie Street  
SYDNEY NSW 2000

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Dear Mr Greenwich,

**Submission from Cancer Council NSW to the NSW Legislative Assembly Committee on Environment and Planning Inquiry into Food Production and Supply**

Cancer Council NSW welcomes the opportunity to provide a submission to the Legislative Assembly Committee on Environment and Planning inquiry into food production and supply in NSW.

We would like to draw your attention to our submission to the 2018 *Inquiry into the price of fresh food in New South Wales* and note that many of our recommendations are relevant to this inquiry. We also note that the final report made recommendations relevant to this inquiry, many of which were not progressed. As well, the 2018 *Access to Healthy Food NCROSS Cost of Living Report* provides insights into the community experiencing food insecurity and makes recommendations relevant to this Inquiry.<sup>1</sup>

Cancer Council NSW support the recommendations from the Charles Perkins Centre's Food Governance Node, University of Sydney.

The Terms of Reference address a range of matters related to food production and supply; our submission will focus on two of the areas listed in the terms of reference that are the subject of the inquiry:

- Improving food security and equitable access to food.
- Implications for quality control and labelling of processed/manufactured food.

## Recommendations

- Ensure a ‘food in all policies’ approach where food systems and food security are integrated into all relevant areas of government policy.
- Establish a NSW Food Security Council of experts from government and non-government organisations to determine the degree to which NSW policy, legislation, services and projects represent the needs of low-socioeconomic populations, with the outcome of reducing food insecurity.
- Develop a state-wide, integrated Food System and Food Security Plan that addresses sustainability, health, equity, and economic development in an integrated way and ensures equitable access to healthy, nutritious food in NSW.
- .
- Ensure food policy development is protected against undue industry influence by adopting recommendations from the Food-Epi Australia project:<sup>2</sup>
  - Require all organisations that receive funding from NSW Government to restrict all promotion (including sponsorship) related to unhealthy food and beverages as a condition of funding.
  - Improve transparency of political donations and add food manufacturers (and associated entities) to the list of prohibited political donors.
- Improve the food environment by addressing the availability, marketing, promotion and pricing of unhealthy foods and beverages:
  - Establish a Public Health Legislative Framework that ensures public health is an objective in planning laws and ensure local governments have a Public Health and Wellbeing Plan.
  - Protect children from the harms of unhealthy food advertising, including removal of unhealthy marketing on state-owned and -contracted property.
  - Reduce availability, marketing, and promotion of sugar-sweetened beverages and advocate to the Australian Government for the implementation of a sugar-sweetened beverage health levy to increase the price by at least 20%.
  - Retain the exemption from GST of fruit and vegetables.
  - Investigate opportunities to subsidise healthy food options and address supply chains to improve access to healthy food in rural and regional communities.
- Ensure food policy development incorporates a range of community, public health, food system, and First Nations voices. Activities developed from the plan should be co-designed with people with lived experience of food insecurity
- Advocate to the Australian Government to raise the rate of income payments to make healthy food and cost of living more affordable.

- Work with the Australian Government, in partnership with First Nations people to develop a strategy for food security and nutrition for remote First Nations communities.
- Support local government place-based approaches to improve access to healthy affordable food for food insecure individuals.
- Align with the goals and targets of the National Preventive Health Strategy and the National Obesity Prevention Strategy, including applying an equity lens to all actions. Develop an updated *NSW Healthy Eating and Active Living Strategy* that captures the relevant goals and targets within both these strategies and addresses the broad food system.
- Use the national food regulatory system to support food labelling initiatives to help the community to eat well including improve the Nutrition, Health and Related Claims Standard, mandate the implementation of Health Star Ratings on all packaged food products and list added sugars on the Nutrition Information Panel.
- Regularly monitor and report on the cost of healthy foods and the availability and quality of fresh fruit and vegetables in NSW.

We would be happy to provide further information on the issues raised in this submission. Please contact Clare Hughes, Manager Nutrition Unit, on [REDACTED] or at [REDACTED]

Yours sincerely

[REDACTED]

Anita Dessaix  
Director, Cancer Prevention and Advocacy Division

## Introduction

### About us

We are Australia's leading cancer charity, working across every area of every cancer. Every day, we support families affected by cancer when they need it most, speak out on behalf of the community on cancer issues, empower people to reduce their cancer risk, and find new ways to better detect and treat cancer. Cancer Council acknowledges Traditional Custodians of Country throughout NSW and recognises the continuing connection to lands, waters, and communities.

Cancer Council NSW is committed to reducing the impact of cancer on individuals and the community, and to lessening the burden for people affected by cancer. Preventing cancer is one of the most effective ways of beating cancer. Many cancers can be prevented by helping people access healthier options, and by creating environments that promote cancer-smart behaviours and reduce exposure to known cancer risks.

### Cancer cases in Australia related to overweight, obesity and poor diet

Most recent estimates show dietary factors and overweight/obesity are each linked to approximately 5% of cancer deaths and 5% of cancer cases<sup>3</sup>:

- 2,329 cancer deaths and 6,714 cancer cases in Australia in 2013 were attributed to dietary factors (low intake of dietary fibre, fruit, and non-starchy vegetables and high intake of red and processed meat).<sup>3</sup> These dietary factors are primarily linked to bowel cancer.<sup>4</sup>
- 1,990 cancer deaths and 5,371 cancer cases in Australia in 2013 were attributable to overweight or obesity.<sup>3</sup> Excess body weight has been linked to 13 cancers; cancer of the oesophagus, stomach, bowel, liver, gallbladder, pancreas, breast (post-menopausal), endometrium, ovary, prostate, kidney, thyroid, multiple myeloma.<sup>4</sup>

Easy access to a wide variety of affordable, good quality fresh food is essential for the people of NSW to follow the Australian Dietary Guidelines, to be able to achieve and maintain a healthy weight and to reduce their risk of cancer.

We are particularly concerned about the low levels of vegetable consumption in our community. Our 2019 *NSW Community Survey on Cancer Prevention* (under peer review), showed:

- The most common reported barrier to not eating enough vegetables was a belief that they had eaten enough (26.8% participants).<sup>5</sup> Of those whose reported intake was

less than the guidelines of 5 vegetables a day, 53.7% thought they were eating enough.<sup>5</sup>

- 21.7% participants said that fruit was too expensive and 12.4% participants said that vegetables were too expensive.<sup>5</sup>

We also asked participants, how easy or hard it was to find a shop selling different food items in the neighbourhood where they lived.

- Less people said fresh fruit and vegetables were 'easy to find' (81%) compared with sugar-sweetened beverages (89%) and fast-food (82%).<sup>5</sup>
- Participants reported having fewer places nearby that sell fresh fruit and vegetables compared to sugar-sweetened beverages and fast-food. In Sydney, 70% participants reported 4 or more places within a 5-minute drive selling sugar-sweetened beverages compared to 68% reporting fast food/takeaway and 45% reporting fresh fruit and vegetables.<sup>5</sup>

Easy access to affordable healthy, fresh foods can assist people to choose healthier foods. The cost and availability of healthy, fresh food influences people's food options and diet quality.<sup>6,7</sup>

While it is too early to understand the effects of the COVID-19 pandemic, there is some data available that shows changes in habits for some of the population. An early study from the Australian Bureau of Statistics Household Impacts of COVID-19 Survey showed 25% people said they had increased consumption of snack foods and 36% reported decreased consumption of take-away compared with before the pandemic.<sup>8</sup> An Ipsos Global study in late 2020 showed 35% Australians said they had gained weight since the COVID-19 pandemic began while 19% said they had lost weight.<sup>9</sup> In 2021, a Cancer Institute NSW survey found more people reported gaining weight than losing it (40% vs 21%).<sup>10</sup>

Other influences on poor diet and weight gain are largely out of the control of individuals, and linked to the prolific availability, marketing, promotion and pricing of unhealthy foods and drinks.<sup>11</sup>

Governments should provide policies and structures that empower people to eat well.<sup>11</sup> The *National Preventive Health Strategy* outlines a range of policy priorities and goals by 2030 under the focus area to improve access to and the consumption of a healthy diet.<sup>12</sup> The Strategy also identifies the need for improving health literacy, particularly taking into account priority populations and equity.<sup>12</sup> The NSW government approach to addressing food production and supply should align with priority recommendations in both the *National Preventive Health Strategy* and the soon to be released *National Obesity Prevention Strategy*.<sup>13</sup> The NSW Government also has a role in the national

food regulatory system to ensure implementation of these plans both within NSW and nationally.

#### Terms of reference #1 Improving food security and equitable access to food

While the role of the food system in helping people to access a healthy affordable diet has been a feature to some extent in the past through the NSW Healthy Eating and Active Living Strategy, the important issues of food production and supply should not be siloed but considered within the whole food system, recognising the interactions between the food supply, consumer selection and consumption and the environment in which they do that.

#### **Food System and Food Security Plan**

We support the following recommendations from the Charles Perkins Centre's Food Governance Node, University of Sydney:

- Ensure a 'food in all policies' approach where food systems and food security are integrated into all relevant areas of government policy.
- Establish a NSW Food Security Council of experts to determine the degree to which NSW policy, legislation, services and projects represent the needs of low-socioeconomic populations, with the outcome of reducing food insecurity.
- Develop a state-wide, integrated Food System and Food Security Plan that addresses sustainability, health, equity, and economic development in an integrated way and ensures equitable access to healthy, nutritious food in NSW.
- Ensure food policy development is protected against undue industry influence by adopting recommendations from the Food-Epi Australia project.<sup>2</sup>
  - Require all organisations that receive funding from NSW Government to restrict all promotion (including sponsorship) related to unhealthy food and beverages as a condition of funding.
  - Improve transparency of political donations and add food manufacturers (and associated entities) to the list of prohibited political donors.

#### **Improve the food environment**

The government should address the obesogenic food environments to ensure the community is supported to consume a diet rich in nutritious food. The World Cancer Research Fund International's NOURISHING framework provides details on evidence-based initiatives that should be considered.<sup>6</sup> While the NSW government has implemented some initiatives to improve the food environment through the previous NSW Healthy Eating and Active Living Strategy, to better help people eat well and

address the availability, marketing, promotion and pricing of unhealthy foods and drinks, Cancer Council NSW recommends the following.

Recommendations:

- Establish a Public Health legislative framework that ensures public health is an objective in planning laws and enables local government to limit access to unhealthy food and encourage access to healthy food.
  - Set actions and targets on public health and obesity prevention at the state and local government levels.
  - Local governments have a *Public Health and Wellbeing Plan* to address community concerns such as the ability to control the density of unhealthy food outlets.
- Protect children from the harms of unhealthy food advertising.

The NSW Government should ensure children are protected from unhealthy advertising in settings within state government control including outdoor advertising, and particularly on state-owned or -contracted public transport. This should be supported by a broader framework that the NSW Government can address by developing a comprehensive regulatory approach to protect children from marketing through the Food Ministers meeting. This is a policy goal outlined in the *National Preventive Health Strategy*.

- Reduce harms from the consumption of sugar-sweetened beverages.

The NSW Government should lead comprehensive action by governments, schools, non-government organisations and others to inform the public about the detrimental health impacts of sugar-sweetened beverage consumption and to influence the public to limit their intake. A comprehensive approach should include:

- Reduce the availability of sugar-sweetened beverages in workplaces, government institutions and other public places.
- Restrict the sale of sugar-sweetened beverages in all schools (primary and secondary), places frequented by children, such as activity centres and at children's sports and events (with adequate resources to ensure effective implementation, monitoring and evaluation).
- Advocate to the Australian Government for the implementation of a sugar-sweetened beverage health levy to increase the price by at least 20% to change purchasing habits, achieve healthier diets and raise revenue for obesity/weight reduction programs.



- Fund a social marketing campaign to highlight the health impacts of sugar-sweetened beverages consumption and encourage people to reduce their levels of consumption.
- Introduce comprehensive restrictions to reduce children’s exposure to marketing of sugar-sweetened beverages, including through schools and children’s sports, events, and activities.
- Use fiscal levers such as taxation incentives, grants, pricing and subsidies to encourage healthy diets.
  - Currently, basic foods such as fresh fruit and vegetables are not subject to the goods and services tax (GST), and this has been identified as an area where Australia is meeting global best practice benchmarks. Given the low rates of fruit and particularly vegetable consumption, it is important that NSW support the continuation of this exemption.
  - There are opportunities for government to further subsidise healthy food options, increasing their affordability, prioritising remote communities where fresh produce can cost up to 30% more than in urban areas.<sup>14</sup> This should include addressing supply chains to improve access to healthy food in rural and regional communities.

### **Action on food security**

Food security has not been recorded in NSW since 2014, however between 2003 and 2014 on average 6% of people 16 years and over in NSW experienced food insecurity.<sup>15</sup> Drakoulidou et al. (2020) found “the prevalence of food insecurity was higher among those who did not attend high school (7.4%), did not have a job (8%), were most disadvantaged (8.4%), earned <\$20 000 per year (12.5%), were separated but not divorced (14.1%), lived in households of ≥7 people (13.5%), smoked daily (15.4%) and rated their health as very poor (18%).”<sup>15</sup>

We draw attention to several important references on food security issues in Australia.

The 2010 discussion paper on food security developed by Heart Foundation, Cancer Council and the Prevention Research Collaboration at the University of Sydney provides useful definitions and descriptions of the issue.<sup>16</sup>

The findings from the recent Federal Inquiry into food pricing and food security in remote Indigenous communities<sup>17</sup> have relevant recommendations which we support including:

*Recommendation 10* The Committee recommends that the Australian Government, in partnership with the States and Territories and First Nations people, develop a strategy for food security and nutrition for remote First Nations communities.

*Recommendation 11* The Committee recommends that the Food Security Working Group that was established during the COVID-19 pandemic be maintained and tasked with:

- identifying improvements to the logistics of food and grocery supply into remote communities
- assessing the viability of warehousing greater volumes of food and groceries in more remote parts of the supply chain
- identifying ways to improve the replenishment cycle of food and groceries in remote community stores
- ensuring food supply during pandemics, natural disasters and seasonal changes
- identifying ways which the major supermarket chains can help play a role in driving down food prices and guaranteeing supply for remote communities
- identifying ways in which Outback Stores might assist independent community stores with the supply of food and grocery.

In the Cancer Council NSW submission to the NSW Inquiry into Fresh Food Pricing we highlighted the need for monitoring. Australia lacks a national program to monitor the cost of healthy foods and the availability and quality of fresh fruit and vegetables. Cancer Council NSW has contributed to the evidence base of food price studies by conducting three healthy food basket surveys in NSW in 2006 (n=149 stores), 2008 (n=105 stores) and 2009 (n=129 stores).<sup>18</sup>

Key findings from the surveys:

- In all three surveys, the cost of the total food basket and the mean cost of fruit and vegetables was highest in remote locations compared with highly accessible areas.
- The three surveys showed considerable variability in the costs of a wide range of food products, and particularly the cost for fresh fruit and vegetables between geographic areas in NSW. One of the most striking findings was the large price difference between the cheapest and most expensive stores across the state, with the biggest difference (\$221) seen across the 44 items in the food basket in 2009.
- The number of fruit and vegetable varieties available was influenced by increasing remoteness, low socio-economic area and supermarket competition

There is more recent data from academic research showing access to affordable diets is difficult for low income families.<sup>19, 20</sup> A 2020 study showed the additional income provided by the COVID-19 extra payments improved the affordability of a healthy diet.<sup>21</sup>

The 2018 *Access to Healthy Food NCOSS Cost of Living Report*<sup>1</sup> provides key insights into those who experience food insecurity in NSW:

- People on low incomes spend a greater proportion of their income on food. Cost of healthy food, including fruit and vegetables was a barrier to purchasing.
- Almost 40% experienced food insecurity in the past 12 months, and reported cutting down the size of the meal, forgoing essential items, and delaying paying bills so they could buy food.
- Easy access to groceries, including the availability of fresh fruit and vegetables was also a concern for many.

Cancer Council NSW supports the recommendations from NCOSS to address access to healthy food including to advocate to the Australian Government to raise the rate of income payments like Newstart and Youth Allowance, to make healthy food and cost of living more affordable.

Cancer Council NSW research in 2016 examined perceptions and beliefs about the cost of fruit and vegetables and whether they are barriers to higher consumption.<sup>22</sup> The main findings showed:

- Cost was identified as a barrier for 29% of people not meeting the recommended fruit servings and for 14% not meeting the recommendations for vegetables.
- Cost was a more common barrier for those on lower incomes and less common for older participants (70+ years).
- 20% of all participants said fruit and vegetables were not affordable.
- 39% of all participants said cost made it difficult to buy fruit and vegetables; and 23% of all participants said the cost of fruit and vegetables meant they bought less than desired.

Recommendations:

- Ensure food policy development incorporates a range of community, public health, food system, and First Nations voices. Activities developed from the plan should be co-designed with people with lived experience of food insecurity.
- Advocate to the Australian Government to raise the rate of income support payments to make healthy food and cost of living more affordable.

- Work with the Australian Government, in partnership with First Nations people to develop a strategy for food security and nutrition for remote First Nations communities.
- Support local government place-based approaches to improve access to healthy affordable food for food insecure individuals. Local governments can develop local food security partnerships and lead a place-based approach. That could include the recommendation from NCOSS to explore “the development of place-based food hubs that create opportunities for people to develop skills around healthy eating and food preparation.”<sup>1</sup>
- Align with the goals and targets of the National Preventive Health Strategy<sup>12</sup> and the National Obesity Prevention Strategy<sup>13</sup>, including applying an equity lens to all actions. NSW urgently needs an updated Healthy Eating and Active Living Strategy that captures the relevant goals and targets within both these strategies and addresses the broad food system.
- Regularly monitor the cost of healthy foods and the availability and quality of fresh fruit and vegetables in NSW.

#### Terms of reference #10 Implications for quality control and labelling of processed/manufactured food.

We acknowledge the importance of accurate food labelling on processed food but would like to highlight the importance of a comprehensive approach to address the harms of processed food that goes beyond labelling. We have listed other areas of the food environment that must be addressed in the previous section.

#### **Better food labelling**

The proliferation of unhealthy, highly processed foods is harming the health of the NSW community and influencing their access to safe healthy foods. The NSW Government should show leadership, through the Food Ministers Meetings to improve food labelling initiatives to support the community to eat well. This should be reflected in a NSW Healthy Eating and Active Living strategy.

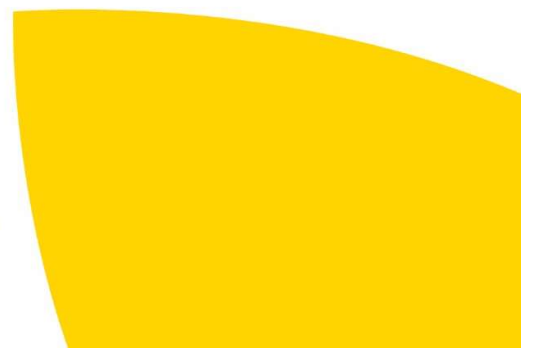
Recommendations:

Use the national food regulatory system to support food labelling initiatives to help the community to eat well:

- Improve the Nutrition, Health and Related Claims Standard:
  - Extend the application of the Nutrient Profiling Scoring Criteria to the regulation of nutrition content claims.
  - Require pre-market approval of food and nutrient-health relationships.



- Endorse mandatory implementation of Health Star Ratings on all packaged food products if the voluntary targets are not reached in the set timeframe.
- List added sugars on the Nutrition Information Panel.



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