

**Response to proposed appendix to NHMRC Dietary Guidelines:  
Australian Dietary Guidelines through an Environmental Lens**

**Future stakes of dietary guidelines at the crossroad between environment and nutrition or how to reconcile nutrition, environment and social issues?**

Food is central to environmental considerations since 30% of gas emissions are related to the production and distribution of our food. And as wisely noted by the FAO's Secretary-General Ban Ki-moon in 2009, "food security is not possible without securing an environmental future".

Encouraging sustainable dietary practices is one of the key solutions in promoting sustainable and socially responsible food production and consumption systems. SFFA believes that energy and emissions, water and waste management and social issues are central to the building of a sustainable Australian food sector.

None of the decisions made by our contemporary society can afford to ignore the impacts caused by our actions or decisions on the environment. The National Health and Medical Research Council is currently facing such a dilemma. Refusing to incorporate environmental guidelines within the body of the proposed policy document is signalling to members of the community, industry and health sector a lack of foresight and leadership in what is regarded as an issue of national importance.

The Sydney Food Fairness Alliance does not welcome the initiative to relegate the environmental considerations of dietary choices to a peripheral document while it should be central to sustainable eating. Here are the main comments that the Sydney Food Fairness Alliance wishes to make on the proposed guidelines.

**1 Environmental information belongs to the main body of the NHMRC Dietary Guidelines**

The Sydney Food Fairness Alliance (SFFA) is very disappointed to see that the NHMRC is proposing to confine advice relating to environmental issues to an appendix rather than embedding it in the main body of the guidelines.

SFFA believes that placing environmental information in an appendix will signal that this is a lesser concern, at a time when we believe that environmental issues need to be brought to a higher level of public attention.

In addition, placing it in an appendix means that it is likely to be overlooked by many people, especially if this is an issue that they have not considered before. This represents a wasted opportunity to encourage Australians to be more considered about all aspects of their dietary intake.

This may not be the traditional approach to dietary guidelines, but an explanation in the preface to the guidelines could highlight why this is considered important to include.

Since many of the recommended dietary practices such as eating more plant based foods, reducing meat consumption, eating fresh rather than packaged, local and seasonal foods all contribute to reducing environmental impacts, it would be easy to include the environmental benefit along with the dietary benefit, rather than in a separate section as an afterthought.

The General Tips section is a good practical tool covering other issues, and could be incorporated at the end of the Guidelines.

## **2 Following the example of other countries – responding to and encouraging community awareness**

There is increasing global awareness of the many challenges facing the environment, including through food production, distribution and consumption. Growing numbers of Australians are already seeking information on how to reduce carbon emissions in every aspect of their lives, and this includes their dietary habits. Member states of the European Union such as Sweden, France and Holland are responding to this challenge by incorporating environmental issues within their nutrition policies and planning. Australia should follow suit.

## **3 Building on the research on environmental impact**

While we understand that research in this area is at its infancy, and much remains to be clarified about the relationships between different foods and the environment, this complexity should not be used as an excuse not to provide the clear advice that *is* readily available, both for individuals and for the professionals who may advise them. As stated in the draft appendix, *'enough evidence exists to begin developing informed, pragmatic and guiding principles to reduce the environmental impact of the food system.'*

Existing evidence should be presented in a way that is accessible to both individuals and professionals.

In light of the rapid development in research in this field, we also argue that the guidelines should be reviewed on a regular basis so that new information can be added as it becomes available.

## **4 Sustainability in the future**

It goes without saying that any dietary guidelines can only be followed in a context of food availability. We cannot afford to ignore or to minimise the many potential threats to our environment and to our food supply, and we all need to work together to effect change.

SFFA believes that the new Dietary Guidelines, supported by their credential within the community and their widespread dissemination, provide an ideal platform for educating Australians on their choices for healthy and affordable food.

We call upon the NHMRC to show a progressive leadership on this crucial issue.

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The Sydney Food Fairness Alliance (SFFA) is an incorporated association that works to promote food security and sustainable food systems across Sydney. SFFA members include health professionals, community workers, primary producers, environmentalists, social justice advocates, planners, community gardeners, academics and development practitioners amongst many others.

