

CPHD Discussion Paper 1: Definition of Public Health*

The Consumer and Public Health Dialogue (CPHD) of FSANZ **supports** including a definition of public health in the FSANZ Act to address strong concerns from a number of consumer and public health groups that there has not been an appropriate focus on broader public health issues. It notes the in-principle support by the Forum on Food Regulation for inclusion of a definition of public health in the FSANZ Act.

The CPHD acknowledges that improving public health requires a comprehensive, multi-level strategic approach, and that food regulation is only one of the necessary measures to promote healthier food choices for the population. However, it is critically important that food regulatory processes have a requirement to apply a public health frame to: risk assessment / technical assessment; risk management and communication; and broader policy setting / decision-making.

The CPHD believes that:

- It is imperative that improving nutrition and total dietary patterns to reduce all diet-related disease AND promote health is the mainstream objective of the food regulation system with emphasis on inhibiting chronic disease in the current context.
- There should be a strong focus on creating food regulatory systems that support healthy lifestyle behaviours and do not undermine healthy food choices.
- As well as being a vehicle to help the public make healthier food choices, food regulation can also encourage the food industry to innovate and develop healthier food products, and thereby assist public health goals.
- The interpretation of 'protecting public health' needs to be inclusive of the social and environmental implications of food regulatory policies and practices. Social implications extend to consideration of equity in health outcomes associated with food regulation policy and practice. Environmental implications extend to consideration of the impact of food regulation policy and practice on the biological sustainability of the food system into the future.

The CPHD strongly supports the following definition of public health being included in the FSANZ Act, to be accompanied by an explanatory note:

“Public Health is defined as the organised response by society to protect and promote health, and to prevent injury, illness and disability.

Public health is distinguished from other roles of the health system by its focus on the health and wellbeing of populations rather than individuals. Public health programs are usually aimed at addressing the factors including social and environmental considerations that determine health and the causes of illness, rather than their consequences, with the aim of protecting or promoting health, or preventing illness”.

Rationale for the need for a public health definition to be adopted by FSANZ

The aims of the food regulation system, as recently defined in the 2008 *Overarching Strategic Statement of the Food Regulation System*,ⁱ clearly places public health on the food regulatory agenda:

- *Protect the health and safety of consumers by reducing risks related to food;*
- *Enable consumers to make informed choices about food by ensuring that they have sufficient information and by preventing them from being misled;*

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- *Support public health objectives by:*
 - *promoting healthy food choices;*
 - *maintaining and enhancing the nutritional qualities of food;*
 - *responding to specific public health issues; and*
- *Enable the existence of a strong, sustainable food industry to assist in achieving a diverse, affordable food supply and also for the general economic benefit of Australia and New Zealand.*

The absence of a definition of public health within the FSANZ Act has resulted in perceptions in the public health community that considerations around industry regulatory burden are given more weight than the economic and social burden due to poor diet and resulting ill health, and ambiguity regarding the public health role of the regulator when developing and reviewing food standards. It has also resulted in unfulfilled potential to expand the current use of the food regulatory system to meet the broader public health objectives as part of a multi-strategic approach by the Australian government to a national food and nutrition policy.

The current system failure, due in part to the inability of the present food regulation system to assist in preventing or slowing chronic diet-related disease patterns and protecting social and environmental sustainability considerations, indicates the urgent need to embed a public health definition within the food regulation system. Food regulation systems, particularly food labelling and composition law and policies, should protect and promote public health by ensuring safe, high quality and nutritious foods are available and promoted to the Australian and New Zealand populations in such a way as to assist them to choose and consume a healthy diet.

There are significant economic costs associated with diet-related disease due to unhealthy food and drink choices.^{ii iii} The economic burden includes not only the direct cost of running Australia and New Zealand health care systems, but also indirect and intangible costs to individuals and society. Access Economics has calculated that the total cost of obesity in Australia in 2008 was \$58.2 billion.^{iv} In New Zealand the costs were estimated NZ\$135 million (about 2.5% of total health care costs), based on obesity prevalence two decades ago.^v There are significant savings to be made to the health care system and society by the provision of consistent funding for large scale and local public health nutrition programs.^{vi}

Definition of public health

One of the first definitions of public health was developed early in the twentieth century. Public health is "the science and art of preventing disease, prolonging life and promoting health through the organized efforts and informed choices of society, organizations, public and private, communities and individuals".^{vii} Clearly this definition could be considered to encompass the role of food regulations but more recent definitions have captured the deliberative notions of organized, strategic and multi-level action.

The definition of public health originally suggested by the National Public Health Partnership and subsequently identified in the Food Ministerial Council's *Overarching Strategic Statement for the Food Regulatory System*^{viii} and the *Labelling Logic*^{ix} report, is supported by the CPHD members:

Public Health is defined as "the organised response by society to protect and promote health, and to prevent injury, illness and disability".

Other public health groups (in submissions to the Review of Food Labelling Law and Policy) suggested that this definition could be expanded to the definition used by the Australian Institute of Health and Welfare. The CPHD suggests that this text could be added as explanatory notes to accompany the definition.

"Public health is distinguished from other roles of the health system by its focus on the health and wellbeing of populations rather than individuals. Public health programs are usually aimed at addressing the factors including social and environmental considerations that determine health and the causes of illness, rather than their consequences, with the aim of protecting or promoting health, or preventing illness".^x

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