

Australian Dietary Guidelines Review Stakeholder Scoping Survey

Nutrition Australia Response

In March 2021 Nutrition Australia (NA) contributed to the Australian Dietary Guidelines [stakeholder scoping](#) survey providing comments on:

- a) how the 2013 Australian Dietary Guidelines are used, and
- b) relevant topics to be considered and possibly included in the review of the Guidelines.

As part of our nutrition education in the community, NA consistently refers to the Guidelines as a source of credible, evidence-based information on foods, food groups and dietary patterns that protect against chronic disease and provide the nutrients for optimal health and wellbeing.

NA recognises that nutrition is an evolving science and acknowledges the importance of revising the dietary guidelines to address emerging topics and latest research that supports recommended dietary patterns for good health.

Below is a summary of Nutrition Australia's response to the stakeholder scoping survey.

List up to 4 topics from the existing Guidelines which you believe should be updated in the review

1. Review and update the definition of 'discretionary' foods

This includes addressing/defining ultra-processed foods as well as identifying nutrients of concern. We would like to see the Guidelines include greater guidance on identifying upper levels of the nutrients of concern (i.e. sugar, saturated fat, sodium) in processed foods that define such foods as discretionary or unhealthy. This can include reference to reading food labels/nutrition information panels.

2. Provide more guidance around sugars

This includes an explanation on different types of sugars (e.g. free and intrinsic) and effect on the body. Also address sugars in juice, and juice concentrates as well as suitability, safety and health effects of artificial sweeteners as an alternative to sugars.

3. Review of the 'grain foods' food group providing greater emphasis on the importance of wholegrains

4. Review the 'milk, yogurt cheese and/or their alternatives' food group

This includes addressing the recommendation of reduced-fat dairy foods with respect to emerging evidence on the lack of association of dairy fat with increased risk of cardiovascular disease¹. The review of this food group should also include greater definition of suitable 'alternatives' to milk, cheese and yogurt which provide similar amounts of calcium and protein with a particular focus on how to identify suitable plant-based milk alternatives.

¹ Lordan R, Tsoupras A, Mitra B, Zabetakis I. Dairy Fats and Cardiovascular Disease: Do We Really Need to be Concerned?. *Foods*. 2018;7(3):29. Published 2018 Mar 1. doi:10.3390/foods7030029

List up to 4 topics, not already included in the Guidelines, which you believe should be considered for inclusion in the review

1. Sustainability

The Guidelines need to recognise that our food choices are not only physical but also social, environmental and economical. In supporting a more environmentally sustainable food supply the Guidelines need to help drive consumer demand for ecologically sustainable food options that can reduce pressure on planetary health. This can include providing practical information on how consumers can purchase food that is sustainably grown and has reduced impact on the environment. Focus on eating seasonal, shopping locally and exploring greater plant-based diets.

2. Impact of processing on the healthiness of foods

Industrial food processing and the consumption of ultra-processed foods is a dominant feature of our food system and Australian's diet. The over-reliance on processed foods, especially energy-dense foods high in sugar, fat and salt, is gradually displacing home-prepared meals and the consumption of fresh fruit and vegetables in typical diets².

The Guidelines need to address how types of processing affect the nature and quality of foods. The NOVA food classification system² which identifies and defines ultra-processed foods, should be used to underpin the Guidelines explanation and consequent recommendations associated with the consumption of ultra-processed foods.

3. Specific dietary guidelines for different stages of life especially older adults

Nutrition needs change as people enter different stages of life. For example, on a physiological level, older adults need more protein to maintain protective muscle mass, calcium to maintain bone strength and adequate energy (kilojoules) to prevent unintentional weight loss when a person has a reduced appetite.

Whilst the guidelines address recommended food group serves for varying ages, there needs to be greater explanation on varied nutritional needs for population age groups with a particular emphasis on unique nutritional needs of older adults. This can have the added benefit of providing aged care facilities, hospitals, respite centres, rehabilitation facilities, carers and other members of the community the information they need to help older Australians to age well and maintain their quality of life.

4. Food environment

The Guidelines need to address the context in which food is eaten and how food decisions are made. Our food choices are shaped by our physical and social surroundings in which we

² Monteiro CA, Cannon, G., Lawrence, M., Costa Louzada, M.L., Pereira Machado, P. Ultra-processed foods, diet quality, and health using the NOVA classification system. Rome: Food and Agriculture Organization of the United Nations 2019.

live. In many parts of Australia (both remote and metropolitan) our food environment makes it hard to choose healthy foods and too easy to choose unhealthy foods.

We recommend the Guidelines include information about the context in which food is eaten, how food decisions are made and how Australians can overcome food environment factors that are barriers to eating in a manner consistent with the Guidelines. This can include addressing the following areas:

- Opportunity for raising awareness among consumers, service providers and the local community of the importance of creating supportive environments.
- Nationally consistent healthy food guidelines for specific settings such as workplaces, schools, early childhood services and community settings.
- Eating out and how to do so in a nutritious way such as messaging on kilojoule labelling at food outlets.

What changes would you suggest to the presentation of the Guidelines and the Eat for Health resources to make them easier to understand and/or use?

- Greater representation of culturally diverse foods within the Australian Guide to Healthy Eating (AGHE) resources.
- Greater pictorial representation of serve sizes within each food group.
- Greater visual representation of healthy fats as part of the AGHE imagery.
- Include healthy fats within the plate model as part of a healthy diet.
- Portray alcohol separately to discretionary foods. This will improve use and relevance of these tools in the school environment.
- Consider an interactive hover feature online to help explain components of the AGHE.
- Include more meal plans/examples of what the guidelines look like for various age groups over a day.
- Consider a comparison tool where Australians can compare what they are eating to the guidelines.
- Provide short explanatory videos about the food groups including in different languages.
- Develop sharable marketing resources such as social media tiles.