

Ministry of Health's Minimising Food Related Choking Risk in Early Learning Service Settings

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Introduction

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry of Health's *Guidelines on Minimising food related choking risk in Early Learning Service settings*.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to the Public Health Service, NMH.

General Comments

4. NMH welcomes this discussion on minimising food related choking risk in education settings. It is vitally important that all children are provided with safe environments and risks to health are minimised. Reducing risk by providing safe physical environments where children are well supervised in designated eating spaces is critical.
5. NMH supports the wording in relation to protocols for the physical environment. NMH notes that there is no specific actions relating to ensuring that children remain seated while they are eating. NMH recommends that an additional bullet point is added that states "Children remain seated while they are eating".
6. The document does not detail the level of supervision or ratios required. Some best practice guidelines¹ have also included the following information:
 - Adults sit down to supervise children before food is passed
 - Adults are always within sight, sound and physical response range to children
 - A ratio of 1:4 at each table for children under 3 and 1:6 at each table for children between 3- 6 is maintained during mealtime
 - Food is prepared, presented, or modified to avoid choking hazards that are common to the youngest child at the table
7. It is unclear within the consultation document whether the guidance around "*How to alter high risk foods to lower choking risk*" applies to the food provided by early education services and/or to food provided by parents. NMH recommends that clarification is given.

¹ University of Idaho (2005) *Building Mealtime Environments and Relationships An Inventory for Feeding Young Children in Group Settings* School of Family and Consumer Sciences, College of Agricultural and Life Sciences
<http://www.cals.uidaho.edu/feeding/pdfs/BMER.pdf>

8. In addition, consideration should be given to the provision of choking education for children and parents. Resources about lunch ideas could be given to parents and include information for children with restricted diets i.e. dairy free, gluten free and vegetarian.
9. NMH notes that the First Aid section states that “*some kaiako must know what to do if a child chokes*”. In order to reduce risk, NMH recommends that this section is strengthened so that all caregivers supervising children eating in early learning service settings can provide choking first aid and cardiopulmonary resuscitation.
10. The “*High Risk Foods to Exclude*” lists nuts and seeds as food that is not practical to alter into the same section as foods that have little or no nutritional value. NMH is concerned that by combining these foods into the same section, this will send mixed messages about the nutritional values of particular foods. Nuts and seeds are high in healthy fats, protein and fibre² whereas the likes of marshmallows, popcorn, rice crackers have little nutritional value. NMH recommends that the list is provided split into different sections with appropriate headings for clarity.
11. Keeping children healthy and safe is paramount, however NMH is very concerned that these guidelines may discourage parents and centres from providing fruit and vegetables to children. These guidelines provide a long list of food (mostly fruit, vegetables and meat) that is considered high risk in relation to choking. Most food could result in a choking incident. By labelling healthy foods as high risk, this could alter public perception of appropriate food to give to children.
12. Given that New Zealand has high obesity rates (12%) for children (Maori 17% and Pacific 30%)³, the importance of fruit and vegetables in a child’s diet is paramount. Providing access to healthy foods plays an important role in childhood development. Lack of adequate consumption of specific foods, such as fruits, vegetables, or dairy products, is associated with lower academic achievement in children^{4,5}
13. The British Nutrition Foundation⁶ found that 43% of adults surveyed found it difficult to find reliable information on healthy diets; and that mixed messages from health and news sources leave adults confused about nutrition. Therefore consideration should be given to providing statements within this document highlighting the importance of fruit and vegetables in a child’s diet, and the need to modify these foods as age appropriate.

² <https://www.nutritionaustralia.org/national/frequently-asked-questions/general-nutrition/nuts-and-health>

³ <https://www.health.govt.nz/nz-health-statistics/health-statistics-and-data-sets/obesity-statistics>

⁴ Kleinman RE, Hall S, Green H, Korzec-Ramirez D, Patton K, Pagano, ME, Murphy JM. Diet, breakfast, and academic performance in children. *Annals of Nutrition & Metabolism*. 2002;46(suppl 1):24–30

⁵ Taras, H. Nutrition and student performance at school. *Journal of School Health*. 2005;75(6):199–213

⁶ <https://www.nutrition.org.uk/press-office/pressreleases/1156-mixedmessages.html>

Conclusion

14. A balanced diet is crucially important as is making Early Learning Service Settings safe environments. The wording of the guidelines needs to be reviewed in relation to “high risk” and “fruit and vegetables” to ensure that there are clear messages about the important role that fruit and vegetables play in a healthy diet, and that some foods may need to be modified to serve to young children.
15. NMH supports the introduction of *Minimising food related choking risk in Early Learning Service settings* but recommends that more emphasis is given to the supervising children eating in Early Learning Service settings, and that all staff are provided with first aid education on choking.
16. NMH thanks the Ministry of Health for the opportunity to comment on the *Minimising food related choking risk in Early Learning Service Settings*.

Yours sincerely

A handwritten signature in blue ink, consisting of a large loop followed by a long horizontal stroke that ends in a small upward flick.

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