

TE WAIORA



Nelson Marlborough
Health

Ministry of Health's Healthy Food and Drink Guidance Survey

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For more information please contact:

Jane Murray

NMDHB Public Health Service

Email: jane.murray@nmdhb.govt.nz

Phone: (03) 543 7805

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 Proposed Healthy Food and Drink Guidance Survey.
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 reiterates the key points that NMH set out in our May submission on the Proposed National and Drink Policy for Education Settings.

Survey Question and Answers

1. *Do you have any comments on the purpose, scope and principles?*

NMH welcomes the introduction of a proposed national food and drink guidance for education settings. As mentioned in our earlier submission, providing access to healthy foods and physical activity plays an important role in academic achievement of students. This guidance will enable schools and educational providers to provide healthy food and drink options. It is hoped that this guidance will be widely adopted and followed.

NMH notes that the Ministry of Health has changed its approach from a *policy* on national food and drink to *guidance* on food and drink. The nature of policies is that there would be expected obligations on education settings whereas a guidance document does not have the same set of obligations. This could result in fewer education settings adopting individual healthy food and drink policies thus resulting in the Ministry of Health not achieving the purpose of these guidelines.

Recommendation 1: that these national food and drink guidance becomes a policy.

NMH is pleased to see that this guidance covers all food and drink provided by, or able to be purchased within a school, and any food or catering provided by an external party within the school environment. NMH recommends that the scope of the Healthy Food and Drink Policy is expanded to include

- events, school camps and fundraisers
- gifts and rewards

Recommendation 2: that the scope is broadened as stated above.

It is noted that the guidance for early learning services includes the advice that *where food and drinks are not provided by the service, parents and carers should be encouraged to provide a lunchbox consistent with the Guidance*. However there is no corresponding advice in the guidance for schools. Amending this wording would give consistent

messaging to teachers, parents and students which would bring greater health literacy about what constitutes a healthy diet, and consequently healthier school lunches. Primary schools often do not have access to school canteens, and many ECEs do not have catering, therefore it is important that there is a policy and associated guidelines to support schools, students and parents and guardians about healthy food choices. This includes additional support for the food choices made by low income families.

Recommendation 3: that the sentence above is added to the school guidance.

NMH notes that the early learning services guidance includes notes about breastfeeding but the school guidance does not. Given the proportion of women who are teachers and teacher aids, consideration should be given to the provision of suitable places on school sites where women can breastfeed their babies or express breastmilk.

Recommendation 4: that school guidance includes notes about breastfeeding

NMH supports the given Principles for the Guidance regarding food and drink options. As a reader, it would be clearer if subheadings were used to differentiate the key information.

Recommendation 5: that subheadings “Healthy Food Choices” and “Healthy Drink Choices” are added to the principles.

2. *Do you agree with the 3.5 HSR as the cut off to compare healthiness of food and drinks?*

The Food Regulation Standing Committee is currently undertaking its Five Year Review of the Health Star Rating (HSR) System with the intention of strengthening the rating system. NMH agrees with adopting the revised 3.5 HSR rating as the cut off.

3. *Do you have any suggestions to improve the nutrient criteria for fruit and vegetables?*

Recommendation: NMH agrees with this section but recommends that the canned fruit is restricted to canned fruit in natural juice. The criteria does not currently recognise canned fruit in natural juice as opposed to syrup which has a much higher sugar content.

4. *Do you have any suggestions to improve the nutrient criteria for breads, cereals and grains?*

NMH supports the approach taken.

5. *Do you have any suggestions to improve the nutrient criteria for milk and milk products?*
Milk and Milk products:

Recommendation: that this section is simplified so that it reads “milk and milk alternatives” rather than including “milk and added calcium milk alternatives e.g. rice, almond, oat, soy”.

6. *Do you have any suggestions to improve the nutrient criteria for legumes, nuts, seeds, fish and other seafood, eggs, poultry and red meat?*

Recommendation: Baked beans can contain high amounts of sugar therefore NMH recommends that the wording is altered as follows: “*Use reduced salt/sodium/sugar varieties where applicable.*”

7. *Do you have any suggestions to improve the nutrient criteria for mixed meals/ready-to-eat and ready-to-heat meals? Mixed meals / ready to eat and ready to heat meals:*

Recommendation: that this section is simplified and supported with examples so that parents, teachers and students could understand it at a glance. Sandwiches are a basic staple to the school lunch so people need to have a clear understanding of what healthy filling options are. The current guidance states “prepared with green category items” but that requires the reader to be familiar with all charts to ascertain the value for each sandwich filling.

8. *Do you have any suggestions to improve the nutrient criteria for fats and oils, spreads, sauces, dressings and condiments?*

Recommendation: It is noted that sauces and dressing have an additional note that they should be used in small amounts or served on the side. NMH recommends that an additional note is included that “Young children are not to serve themselves” as they have a tendency to use excess amounts.

9. *Do you have any suggestions to improve the nutrient criteria for packaged snack foods?*
This type of snack food is widely used in school lunch boxes. This section does not provide any examples of amber products, it would be useful to have examples provided so the reader can quickly ascertain the types of food that would be acceptable.

NMH notes that the confectionary criteria in the Early Leaving Services guidance is misleading and focuses on the choking hazard rather than simply stating first in the red category “all confectionary” then providing choking information.

10. *Do you have any suggestions to improve the nutrient criteria for baked items? Bakery items:*

Recommendation:

- 75% of the bakery items [~~More than half of the baked products~~] must contain some wholemeal flour, wholegrains and/or fruit or vegetables (e.g. fresh, frozen or dried).
- The fat/sodium/sugar levels are stated rather than stating “less fat, salt, sugar”
- No confectionery within products
- The categorisation of pies is further defined (i.e. vegetable/fruit pies and meat pies containing less than 20% of meat)

11. *Do you have any suggestions to improve the nutrient criteria for drinks?*

Recommendation: that the following statement is shown above the nutrient criteria: “Milk and plain unflavoured water should be the only drinks on offer”

According to the Ministries of Health and Education, sugary drinks are a significant cause of poor oral health and contribute greatly to childhood obesity and Type 2 diabetes. The Ministries also note sugary drink consumption is associated with problem behaviours and lowered academic achievement¹.

If the Ministry decides to include fruit or vegetable juices (no-added sugar) then the portion size should be no greater than 150ml. This is in line with the NHS guidelines for fruit juices.²

This section could be simplified so that it reads “milk and milk alternatives” rather than including “milk and added calcium milk alternatives e.g. rice, almond, oat, soy”

12. *Do you have any further other comments?*

NMH is pleased to see that the guidance now recommends that a greater proportion of green category items are available (75%) compared to amber items (25%). This shows a clear indication that green items are the preferred option.

The proposed Healthy Food and Drink Guidance is very detailed with complex food category charts which is appropriate for those schools whose food is catered however it is important that simplified guidance documents highlighting the importance of affordable healthy options are available so that teachers, parents and students can easily understand the information.

Recommendation: that each food category chart includes a simplified row at the top of the table that is easy to understand at a glance and includes examples.

In addition, a clear communication plan needs to be developed so that schools and their communities know how to access this guidance.

NMH also recommends that the Ministries of Health and Education work together on a whole school approach to food policy which includes coherent messages about food provided in the school and what is taught within the curriculum regarding food and nutrition. Teaching and learning activities can enable students to challenge common perceptions and assumptions about why people make particular food choices. These activities can also encourage students to develop empathy for those members of the community whose choices are limited by circumstances. It is important that students use a socio-ecological perspective to examine the influences of culture, technology, and society on food choices,

¹ <https://www.nmdhb.govt.nz/campaigns/tap-into-water/sweet-enough-water-only/>

² <https://www.nhs.uk/live-well/eat-well/5-a-day-what-counts/>

food preparation, and eating patterns. This has been acknowledged in the Health and Physical Education curriculum.^{3,4}

Conclusion

13. NMH supports the overall content of a National Food and Drink Guidance but recommends that this is made a policy so that more educational providers adhere to requirements to provide healthy food and drink options. NMH also recommends that the food policies are also linked into the school curriculum so that teachers, parents and students also have a greater understanding of food and nutrition. NMH thanks the Ministry of Health for the opportunity to comment on the Healthy Food and Drink Guidance Survey

Yours sincerely



Peter Bramley
Chief Executive
Peter.bramley@nmdhb.govt.nz

³ Ministry of Education (1999) *Health and Physical Education in the New Zealand Curriculum*. Learning Media, Wellington

⁴ Ministry of Education (2004) *Health and Physical Education Curriculum in Action*. Learning Media, Wellington