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HCCA Response to the 'My Healthy Food and Drink Choices' Discussion Paper

Submitted 27 May 2013

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Background

The **Health Care Consumers' Association (HCCA) of the ACT** was incorporated in 1978 to provide a voice for consumers on local health issues and now provides opportunities for health care consumers in the ACT to participate in all levels of health service planning, policy development and decision making.

HCCA involves consumers through:

- consumer representation
- consultations
- training in health rights and navigating the health system
- community forums
- information sessions about health services
- advocating for issues of concern to consumers

In 2008, State and Territory Health Ministers endorsed the Australian Charter of Healthcare Rights. The Charter was developed by the Australian Commission for Safety and Quality in Health Care and applies to all people receiving, seeking or delivering health care in all settings in Australia. The Charter was launched in the ACT in December 2009 by the Health Minister, Ms Katy Gallagher MLA. HCCA believes that a shared commitment to the Charter will improve the safety and quality of health care for all consumers.

The Australian Charter of Healthcare Rights states that all consumers have the right to:

- **Access** – to have timely access to health services that address our needs
- **Safety** – to receive safe and high quality care
- **Respect** - to be shown respect, dignity and consideration
- **Communication** – to be informed about services, treatments, options and costs in a clear and open way
- **Participation** – to be included in decisions and choices about our care as well as health service planning

- **Privacy** – to have our privacy maintained and proper handling of our personal health information assured
- **Comment** – to comment on or complain about our care and have our concerns addressed properly and promptly

It is with reference to these rights that the HCCA has developed its response to the 'My Health Food and Drink Choices' discussion paper.

General comments

HCCA welcomes the opportunity to provide consumer input to the consultation on the My Healthy Food and Drink Choices Initiative. Access to healthy foods is an important public health issue to address and we strongly support the overarching goals outlined in the discussion paper. However, ACT Health will need to ensure that the initiative does not become too proscriptive in nature. Consumers and staff are not likely to appreciate simply being told what they have to eat, so it is important that the initiative is accompanied by education and promotion campaigns to demonstrate the reasoning behind the initiative and encourage greater buy-in from the public.

We understand the simplicity of the traffic light system being proposed, but are concerned that this may lead to excessive rigidity in terms of what is considered healthy and unhealthy. Some of our members have identified items in the green and red categories that they believe should have been labelled differently. For instance, low fat milk and soy drinks are in the green category, even though these drinks are often high in added sugar. Similarly, foods containing natural fats and oils have been included in the red category even though moderate amounts of these foods are recommended for a balanced diet.¹ The main principle that ACT Health needs to get across is that people need to eat as much fresh food as possible.

We suggest that the focus of the initiative needs to be on improving public health and nutrition, rather than simply reducing obesity rates. Reducing obesity is only one indication of improvement in population. There are many people who would not be considered obese, but have poor diets that impact on their health. With overall improvement in nutrition and health, we are also likely to see reduction in obesity.

Anyone who has ever attempted to adhere to a strict diet will know that food needs to be appetising as well as healthy; otherwise it is extremely difficult to not to give in to temptation. No matter the percentage of green category foods available to staff and visitors, they will continue to purchase the limited range of red category items unless the healthy options are appealing. This will also be important for maintaining positive business outputs and satisfying consumer demand at the targeted venues.

¹ <http://www.hsph.harvard.edu/nutritionsource/pyramid-full-story/>

Question 1: Scope of the initiative

There may be difficulties maintaining current levels of food purchase with some of the supply outlets listed once the anticipated changes are effected. It is important to have detailed consultations with vendors to assess practical and saleable alternatives that they can provide. Consideration will also need to be given to the shelf-life of these alternatives and the frequency with which items have to be restocked.

We do not necessarily see a need to eliminate all red category foods from items used as rewards or gifts, as these are intended for a 'special occasion'. This is an instance where rigidity is likely to reduce buy-in to the initiative from the public.

We note that patient meals have been excluded from this initiative and assume this is because their meals are already designed with specific nutritional requirements in mind. However, patients would also benefit from an initiative aimed at providing a better and more appealing range of healthy options. Patients visiting ACT Health services not located at a hospital would also be affected. Moreover, there may be patients staying at the hospital that choose to eat at venues around the hospital, depending on their health status.

We are interested to know whether all ACT Health staff will be involved in this new initiative or if it only applies to front line staff working in health facilities.

Question 2: Comments on the proposed standards

Overall, the proposed standards will assist in providing healthier food options for staff and visitors, although this will be contingent on the quality of healthy foods that are provided.

It will be important to provide information for consumers and staff regarding the fresh food being distributed in vending machines. For instance, some people would be concerned that the fresh food may have been sitting in the vending machine for too long. This could be addressed by placing signage next to vending machines stating how frequently the food is checked to make sure nothing is past its use-by date.

We would also like to see an acknowledgement that food is not either 'bad'; or 'good'; it is more a matter of eating a balanced diet and avoiding eating unhealthy foods too often.

Question 3: Financial impacts

There may be a financial impact on those operating cafes etc. at the start of the initiative if customers/consumers do not engage with the initiative. There is also likely

to be considerable cost involved in adjusting menus for these businesses that may cause some frustration. It will be essential for ACT Health to support and consult with affected vendors in order to maintain good will.

Question 4: Useful resources

Consumers would appreciate general information sessions at community health centres, and through the media (including social media) that gives the background to this initiative and provides examples of practical food choices. It would also be useful to demonstrate some of the links between food choices and chronic conditions. Posters showing how healthy food choices can reduce risks of high blood cholesterol and high blood pressure would also help to engage consumers and staff with the initiative.

Posters explaining the traffic light system next to vending machines and cafes would help staff and visitors to understand why their food options have been changed and make it more likely that they will choose an item from the green category.

Question 5: Transition Period

The proposed transition period of 12-18 months to allow time for implementation planning and transition to the new arrangements could also be used as a time for targeted consumer education and raising awareness. For instance, has ACT Health considered ways to inform Culturally and Linguistically Diverse (CALD) communities about the new initiative?

Question 6: Additional comments

HCCA has found that when we provide healthy options at functions and training sessions, there is often a lot of wastage. This is a clear demonstration of the fact that it is ultimately up to the consumer to decide to make healthy food choices.

We are also concerned that the tables outlining the criteria for categorising food and drink focuses mainly on fat, salt and sugar, rather than considering the additional nutrients that may be contained in the food items. Although the importance of a wide range of healthy nutrients has been acknowledged throughout the discussion paper, it does not appear as though this is actually being taken into account in the categorisations.

Concluding remarks

HCCA views the My Healthy Food and Drink Choices Initiative as a positive first step towards improving the availability of healthy food and drink options in ACT Health

Services. We hope that continued development will involve careful evaluation of the effectiveness of the program, including monitoring staff and consumer responses to the changes in food options. It would also be useful to look at any data available from other states that have implemented similar initiatives in health settings.

A handwritten signature in blue ink, appearing to read 'Darlene Cox', with a stylized, cursive script.

Darlene Cox
Executive Director