

# Aide-Mémoire

## PHAC Report – Rebalancing our food system – talking points and preliminary advice

<b>Date due to MO:</b>	9 May 2024	<b>Action required by:</b>	N/A
<b>Security level:</b>	IN CONFIDENCE	<b>Health Report number:</b>	H2024040514
<b>To:</b>	Hon Dr Shane Reti, Minister of Health		
<b>Copy to:</b>	Hon Matt Doocoy, Minister for Mental Health		
<b>Consulted:</b>	Health New Zealand: <input checked="" type="checkbox"/>		

### Contact for telephone discussion

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# Aide-Mémoire

## PHAC Report – Rebalancing our food system – talking points and preliminary advice

**Date due:** 9 May 2024

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**To:** Hon Dr Shane Reti, Minister of Health

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### Purpose of advice:

- The Public Health Advisory Committee (PHAC) intends to publish its first major topic report – *Rebalancing our food system* (the Report) – on the Ministry of Health’s website on 15 May 2024.
- The PHAC Chair, Kevin Hague, provided your office with a copy of the PHAC’s proposed communication plan to support the publication of the Report via email on 3 May 2024.
- This Aide Mémoire provides preliminary advice to you on each of the Report’s recommendations, as per your request of 29 April 2024.
- Initial feedback has been sought from other relevant agencies where possible. A table providing preliminary departmental responses is provided at **Appendix 1**. Reactive talking points are provided at **Appendix 2**.

### Details of the Report:

- The PHAC is an independent expert advisory committee established in July 2022 under section 93 of the Pae Ora (Healthy Futures) Act 2022. The Report was commissioned by the previous Minister of Health, Hon Dr Ayesha Verrall.
- The Report provides a view of the New Zealand food system, describes a case for change, and considers barriers to, and options for, strengthening the way the food system impacts on population health and wellbeing.
- The Report makes 13 specific recommendations to you as the Minister of Health, under 5 broad headings.

**Comment:**

**Departmental advice on the Report's recommendations**

*The recommendations of the Report align with Government priorities*

- The Governments long-term vision for health and wellbeing is to achieve longer life expectancy and improved quality of life for all.
- You have indicated a priority to accelerate action to address the 5 non-communicable diseases of cancer, diabetes, respiratory disease, cardiovascular disease and poor mental health that contribute to the majority of health loss in New Zealand.
- Improved prevention of these non-communicable diseases will be achieved through addressing 5 key modifiable risk factors, one of which is poor nutrition. Implementing recommendations of the Report would have direct and indirect benefits to nutrition in New Zealand.
- Separately, you have commissioned health officials to draw up a 'menu' of evidence-based interventions to address these risk factors - as well as interventions to address the prevention, early detection and management of the non-communicable disease conditions. Officials will be providing you with advice on this work shortly.
- At least 2 of the Report's recommendations are directly relevant to empowered communities. This aligns with your priority of decision-making being made closer to communities.
- The recommendations of the Report are well aligned with the *New Zealand Health Strategy* (particularly priority 6 – partnerships for health), *Pae Tū: Hauora Māori Strategy* (particularly priority 2 – strengthening whole-of-government commitment to Māori health) and *Te Mana Ola: The Pacific Health Strategy* (particularly priority 1 – population health).

*Recommendations provide opportunity to lead transformational change*

- The recommendations of this Report provide you and this Government with an opportunity to lead transformational change to the food system.
- The Report describes challenges with the current food system. The responsibility for responding to these challenges does not sit clearly within any single ministerial portfolio or government agency.
- While our economy's relative reliance on food exports may be unique to New Zealand, the overall challenges with our food system are not. Countries across the world are struggling with the challenge of ensuring their food systems are healthy, sustainable and secure. These challenges are in the context of ongoing

difficulties with the cost-of-living, international conflict, and changing climates.

- The recommendations of the Report are aligned with a number of recent external calls for national leadership in this area, for example from the National Sciences Challenge, Health Coalition Aotearoa, and The Aotearoa Circle via the Mana Kai Initiative (**see Appendix 1**).
- Initial engagement with other agencies has indicated strong support for the overall intent of the Report, and a commitment to engage on further co-ordinated cross-agency work to improve our food system for all New Zealanders.

*The Report identifies a need for clarity within the food system*

- As the Report describes, our food system is complex, and made of many parts – akin to an ecosystem. The different parts of the system are inherently linked, as are the outcomes.
- It is important to recognise that the economic benefits of our food system are linked to benefits to population health. A national food strategy, or similar, would help to clarify the multiple objectives of our food system.
- While there are substantial opportunities to rebalance the food system, it is important to consider the impact of any changes on the health, wellbeing, social, cultural, and environmental objectives alongside economic objectives.

*Proposed prioritisation of recommendations*

- When considering options for implementing recommendations in the Report, we propose priority is given to recommendations 1, 2, 6 and 12.
- **Appendix 1** provides more detailed advice on each of the Report's recommendations. High-level responses to recommendations 1, 2, 6 and 12 are provided below.
- Prior to progressing further work on most other recommendations, a logical first step would be to consider options to address recommendation 2 – to provide clarity on overall accountability for the food system. The Report calls for an all-of-government response to address the challenges facing our food system. Many of the recommendations would be difficult to implement in practice without more clearly defined leadership and responsibility for the food system overall.
- Recommendation 1 – to develop a national food strategy – could be a useful vehicle to pick up other recommendations in the report, and progress government priorities relating to food and nutrition.

- Recommendation 6 – to develop a comprehensive reformulation programme – is likely to have a substantial and cost-effective impact on improving population diets.
- Recommendation 12 – to fund implementation of regular national nutrition surveys – is a key enabler to much of the work required to improve food environments, and would not require extensive cross-portfolio consideration (ie, it is not reliant on recommendation 2 being progressed), however new funding would be required.

*Additional context*

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- A supporting report summarising feedback from stakeholders, commissioned by the PHAC and prepared by Synergia, will be released alongside the PHAC Report. We are advised that the PHAC will provide this supporting report to you directly, prior to publication.
- The recommendations of the Report are far reaching. While we have made best efforts to engage with the relevant agencies, it is possible that other Ministers will be asked for comment on the Report or its recommendations. We suggest you share the Report and preliminary advice with other Ministers whose portfolios overlap with this work.
- Recommendation 10 specifically refers to Ka Ora, Ka Ako. We are aware that this programme was recently considered by Cabinet and of recent Budget 24 announcements on this topic.
- The following agencies were consulted when preparing this advice;
  - Ministry for Primary Industries (MPI)
  - Ministry for the Environment (MfE)
  - Ministry of Education (MoE)
  - Ministry of Social Development (MSD)
  - Department of Internal Affairs (DIA)
  - Ministry of Business, Innovation and Employment (MBIE)
  - Commerce Commission
  - Te Puni Kōkiri (TPK)

- Ministry for Pacific Peoples (MPP)
- Health New Zealand (including the National Public Health Service) (HNZ/NPHS)
- This aide-mémoire discloses all relevant information.



Dr Andrew Old  
Deputy Director-General  
**Public Health Agency Te Pou Hauora**  
**Tūmatanui**

PROACTIVELY RELEASED

## Appendix 1: Preliminary advice on specific recommendations

#	Recommendation	Preliminary advice	Implementation considerations
<b>Develop a unified food system for Aotearoa New Zealand</b>			
1	That the Minister of Health work with colleagues in Government, in partnership with communities to develop a <b>National Food Strategy</b> to deliver a rebalanced food system that upholds Te Tiriti, and prioritises the health and wellbeing of New Zealanders, Indigenous (Māori) rights, and protecting the environment, ahead of economic goals.	<p><b>A national food system strategy linked to a targeted action plan with clear accountabilities would help ensure ongoing progress towards maintaining and improving our food system. This would be difficult to develop and implement without recommendation 2 being addressed.</b></p> <p>The food system in New Zealand is complex and fragmented. While food is one of our main exports, there are many New Zealanders who are going hungry, or do not have access to the healthy and nutritious food they need. As evidenced through Environmental Reporting and in the latest <i>Our Land 2024</i> report<sup>1</sup>, land use intensification and legacy effects are causing environmental, climate and biodiversity harm that for the most part are directly or indirectly attributed to the food system. Such issues are equally jeopardising progress towards to a more efficient, resilient and sustainable food system.</p> <p>The food system is a holistic concept for Māori. Māori have a strong spiritual and cultural connection with kai. In te ao Māori there is a spiritual connection with ngā Atua Māori, the deities associated with food production while the cultural value of kai is embedded in the act of manaakitanga – the giving and receiving of hospitality.</p> <p>Māori have interests in mahinga kai (traditional food resources and practices) and the places they are gathered from.</p> <p>Rights to traditional kai can be found captured in Te Tiriti o Waitangi, various other policies (eg, customary fishing management practices<sup>2</sup>) and Waitangi Tribunal claims.</p>	<p>This has potential to impact positively on health outcomes, in line with your priorities for prevention, and the process of development could be a useful vehicle for picking up government priorities across a range of linked portfolios.</p> <p>This has potential to impact positively on Māori health outcomes, if the strategy were developed in partnership with Māori, with clear actions and accountabilities.</p> <p>Clear accountability for the strategy through addressing recommendation 2 would be important.</p>

<sup>1</sup> [Our-land-2024.pdf \(environment.govt.nz\)](#)

<sup>2</sup> [Māori customary fishing information and resources | NZ Government \(mpi.govt.nz\)](#)

	<p>There is increasing interest both in New Zealand and internationally to transform food systems in ways that will enable secure food supply into the future. A National Food Strategy would be helpful to provide clarity regarding the social, cultural, environmental and economic objectives of our food system. Other countries, including the United Kingdom and Canada, have national food strategies.</p> <p>It would be important to consider the health, wellbeing, social, cultural, environmental and climate objectives <i>alongside</i> the economic objectives, rather than one ahead of the other. For example, this Government's goals for economic growth through food export should explicitly include targets that have beneficial flow-on effects for public health and prevention funding and increase the prosperity of all New Zealanders. Equally, ensuring workers (and their dependents) are healthy is critical to support productivity and economic growth.</p> <p>We need to ensure we maintain and strengthen our food regulatory systems as a pillar of any approach to addressing food systems. Our regulatory systems ensure food is safe to eat for all New Zealanders. This is a critical support to public health – preventing illness and additional burden on the health system.</p> <p>We consider that the approach that would have the greatest impact is to agree high level strategic goals and then develop a cross-government action plan, rather than the development of a detailed strategy.</p> <p>We would not need to start from scratch. For example, the Mana Kai Initiative (which includes MfE and MPI representatives), under the auspices of The Aotearoa Circle (a public-private partnership) has developed proposed purpose, values and action plans for the New Zealand Food System. However, without clear agency or ministerial accountability it has been challenging to progress.</p> <p>The National Science Challenges have also called for a science-informed food strategy that provides a framework to underpin and connect policy relating to food across sectors<sup>3</sup>. The Science Challenge call is wide-ranging and includes similar themes to international food</p>	
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<sup>3</sup> [NSC NationalFoodStrategy Brief.pdf \(ourlandandwater.nz\)](#)

		<p>strategies. Additionally, the science challenge calls for the food system to embrace and respect traditional methods and knowledge of food production and the protection of taonga species.</p> <p>Additionally, there was a petition presented by Eat New Zealand to New Zealand Parliament, requesting the Government facilitates development of a national food strategy for Aotearoa.</p> <p>We consider that implementing this recommendation would be most effective if done in concert with addressing recommendation 2.</p>	
2	<p>That the Minister of Health work with colleagues in Government to <b>establish a cross-government entity and/or Ministerial responsibility for food and food security</b>, which has overall accountability for the food system meeting the goals of the Food Strategy and covers health, social, primary industries, environment, education, and trade, and ensures all cross-government policy considers the impact on food systems.</p>	<p><b>There is an opportunity to provide stronger leadership for our national food system through strengthened collaboration and alignment across portfolios. There are some options to achieve this. We suggest further detailed advice is commissioned regarding options to improve clarity of the responsibility for food and food security.</b></p> <p>The responsibility for food and food security currently lies across a number of ministerial portfolios and government departments (H2024036866 refers). This creates some challenges with competing objectives and priorities.</p> <p>The Public Health Agency (PHA) currently leads a Cross-Agency Food System policy group. It was established in 2020 as the COVID-19 pandemic demonstrated just how vulnerable Aotearoa New Zealand's food system was, and which exacerbated food insecurity placing overwhelming harm on food banks, particularly during lockdown. This group collaborates on food system issues and opportunities to ensure an integrated approach to advice and action on our food system. However, there are challenges in enacting change due to competing priorities across agencies and portfolios.</p> <p>A practical way to address this recommendation in the near term may be to formalise a regular ministerial forum. The Ministerial Forum could have oversight over food system issues and opportunities, discuss broad government policy issues as they relate to the food system, and make joint decisions on projects where they relate to multiple portfolios. Similar ministerial groups have been used in other complex areas that involve multiple portfolios, such as suicide prevention, family violence, and sexual violence.</p>	<p>There are several options that would meet the intent of this recommendation. The options would vary in implementation complexity and in impact.</p> <p>While some preliminary thoughts have been provided, we recommend you seek more detailed advice on options for how the Government could practically implement the intent of this recommendation.</p> <p>Addressing this recommendation would indirectly address a number of the other recommendations in the Report.</p> <p>Without implementing some form of this recommendation to create clarity re accountabilities, many other recommendations will be difficult to progress.</p>

		<p>The Ministerial Forum could consist of Ministers with relevant portfolios including: health, food safety, environment, foreign affairs and trade, agriculture, commerce and consumer affairs, social development, and education.</p> <p>The establishment of a Ministerial Forum for the food system would also recognise our COP28 commitments when New Zealand became a signatory to the “Emirates Declaration on Resilient Food Systems, Sustainable Agriculture and Climate Action” at the United Nations Climate Change Conference – COP 28, in Dubai (30 November – 12 December 2023). MfE have flagged this development in a briefing that reinforces the need to take a food system approach to “... <i>strengthen collaboration among our respective ministries – including agriculture, climate, energy, environment, finance, and health – and with diverse stakeholders to achieve the objectives and efforts articulated in this Declaration, and as appropriate within our national contexts.</i>”<sup>4</sup></p> <p>An alternative option would be to create a new ministerial portfolio for food/the food system. This portfolio could have oversight over the work of the various agencies that contribute to food system policy.</p> <p>Although a new government agency for food could be established, this would require significant investment and/or reallocation of resources. Significant clarity could be provided through other means as described above.</p> <p>This challenge is not unique to New Zealand. In 2023, the Australian Government published a report in response to an inquiry on food security in Australia. It acknowledged a dispersion of food policy across portfolios and the need for greater coordination across government in dealing with issues around food. Among its recommendations were the development of a National Food Plan and appointing a Minister for Food with responsibility for the development and implementation of the National Food Plan.</p>	
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<sup>4</sup> COP28 Leaders Declaration on Sustainable Agriculture, Resilient Food Systems and Climate Action <https://data.consilium.europa.eu/doc/document/ST-15436-2023-INIT/en/pdf>

		In addition, there is evidence to suggest introducing government procurement of food policies can capture both planet-friendly and health policies that can achieve wider co-benefits across society. <sup>5</sup>	
3	<p>That the Minister of Health work with colleagues in Government to <b>centre health and health equity within food system decision-making</b>, by:</p> <p>a) centring health and health equity within the new <b>food strategy</b>,</p> <p>b) ensuring that Aotearoa New Zealand’s Ministry of Health and Ministry for Primary Industries have <b>equal input into the Joint Food System</b> with Australia,</p> <p>c) ensuring <b>Indigenous participation</b> in Joint Food System decision making, and</p> <p>d) making <b>changes to the Food Act</b> to ensure that all risks to public health from</p>	<p><b>There is an opportunity to enhance the consideration of health priorities in our food system. Some regulatory levers sit within the primary industries portfolios (ie, agriculture and food safety). Acting on recommendation 2 would be a useful step to progress this.</b></p> <p>a) Recommendation 3a could be considered if recommendation 1 is progressed if desired.</p> <p>b) The settings for our Joint Food System with Australia are set out in the Food Standards Treaty between Australia and New Zealand (the Treaty). This Treaty commits us to joint food composition and labelling standards, and so provides one avenue to improve the healthiness of the food environment in New Zealand.</p> <p>The current settings in the Treaty provide for one ministerial delegate from New Zealand to attend Food Ministers’ meetings. The New Zealand delegate is the Minister for Food Safety. Most Australian states and territories have ministerial delegates from health portfolios in addition to, or instead of, primary industries. Ministry of Health officials work closely with MPI officials to prepare for these meetings. Significant decisions impacting New Zealand are discussed with Cabinet prior to adoption. If a New Zealand food system Ministerial Forum was established, as per recommendation 2, this would help to ensure that the Minister attending meetings could represent New Zealand’s perspectives from a whole food system point of view. Alternatively, in the absence of a ministerial forum, the Minister for Food Safety could formalise meeting with the Ministers of Health and Trade prior to each trans-Tasman Food Ministers’ Meeting. This is currently undertaken informally, and only when there are agenda items relevant to the Health or Trade portfolios. Another option may be to combine the Food Safety and Health portfolios in some way – for example the Minister for Food Safety also being appointed as Associate Minister of Health which may enable the one Minister to represent perspectives from primary industries and from health more clearly.</p>	<p>Addressing recommendation 2 would enable this recommendation to have the greatest impact.</p> <p>There are options to increase the participation of Health into the Joint Food System with Australia which could be enacted relatively easily.</p> <p>The Government may wish to commission a review of the Food Act (2014) – this would require discussion with the Minister for Food Safety. Such a review could encompass a number of other of the Report’s recommendations (for example 4 and 7) within its scope.</p>

<sup>5</sup> Pastorino S, Hughes D, Schultz L, et al. (2023). *School meals and food systems: Rethinking the consequences for climate, environment, biodiversity, and food sovereignty*. URL: <https://hdl.handle.net/10568/137479>

	<p>the food system are recognised and acted on.</p>	<p>There is currently a Food Regulation Standing Committee that supports the Food Ministers in the Joint Food System meeting. New Zealand has 2 representatives on this group. Currently both of these representatives are from MPI. If you wish to have a representative from the Ministry of Health on this committee, you could discuss this option with the Minister for Food Safety. It is worth noting that support for members on this committee requires significant resource from the supporting agency. The Committee is responsible for developing policy, undertaking consultation, and providing advice to Ministers independently of their home agencies.</p> <p>c) The Food Standards Australia New Zealand Act 1991 (FSANZ Act) is currently under review, which creates an opportunity to increase indigenous participation in the joint food system, for example through FSANZ Board membership and participation in FSANZ advisory groups, if desired. There is currently a lack of inclusion of Māori and First Nations peoples in the FSANZ Act. It also does not reflect the New Zealand Government’s responsibilities under Te Tiriti o Waitangi, nor does it meet our obligations under the Pae Ora (Healthy Futures) Act 2022 to improve health outcomes and address health need/ inequities for Māori and other priority populations. The PHA has provided a response to the public consultation on the FSANZ Act review.</p> <p>d) The Food Act (2014) is administered by MPI. Ministry of Health officials are consulted on any proposed amendments. The purpose of the Food Act includes to “provide for risk-based measures that – minimise and manage risks to public health; and protect and promote public health.” Currently, activity under the Food Act focuses predominantly on acute food safety rather than long term public health. There may be an opportunity for Government to direct MPI to review the Food Act with a view to whether it could be strengthened to support longer term public health outcomes as well as acute food safety risks.</p>	
<p><b>Enable local communities</b></p>			
<p>4</p>	<p>That the Minister of Health work with colleagues in Government, to <b>resource and enable community</b></p>	<p><b>There is an opportunity to further enable community development of local and regional food systems. Levers for this would largely sit outside of the health portfolio. Acting on recommendation 2 would be a useful step to progress this.</b></p>	

	<p><b>leadership</b> for local food systems including,</p> <p>a) supporting <b>community participation</b> in local decision making, and local and national food system planning,</p> <p>b) supporting local government to <b>develop and implement local and regional food strategies</b> in partnership with local communities and local public health services/local health authorities, and</p> <p>c) supporting and learning from <b>programmes which are working</b> to improve local food environments.</p>	<p>a) Health New Zealand, through the National Public Health Service (NPHS), currently provide support to local and regional government and communities to develop and sustain local food systems. There is opportunity through existing NPHS engagements to improve clarity of how local government and/or community-led initiatives are resourced and to enable best practice sharing. In addition, Iwi Māori Partnership Boards could be a vehicle for giving life to this recommendation.</p> <p>b) Development of a national strategy (recommendation 1) would provide the framework to enable local governments and local communities to better address their local and regional food system needs. Further work in this area would require collaboration across portfolios including the social wellbeing and infrastructure sectors. A review of the Food Act could include in its scope consideration of legislative powers for local government to support the development of local healthy food systems.</p> <p>c) You have previously been provided with advice regarding Healthy Families NZ (HNZ0043066 refers). This is an example of a government-supported programme with a wide focus that, among other activities, works to improve local food environments using a collaborative, community-based approach. This initiative is funded \$12 million per annum from Vote Health and is administered by Health New Zealand.</p>	
<p><b><i>Use legislation, policy and regulation levers to create and foster healthy food environments</i></b></p>			
5	<p>That the Minister of Health and colleagues in Government work with communities and hapū and iwi to <b>support the growth and revitalisation of Indigenous Māori food systems</b> and traditional kai</p>	<p><b>There is an opportunity to consider the role of government in the growth and revitalisation of mātauranga and taonga Māori in alignment with the articles and principles of Te Tiriti o Waitangi. Acting on recommendation 2 may provide a mechanism for Te Tiriti-based leadership of the food system if desired.</b></p> <p>This recommendation is aligned with your priorities for Māori health, including through shifting decision-making around resources closer to homes and communities, enabling local leadership, collaboration, and innovation to meet needs. This will be reinforced with a continued focus on Māori health monitoring at all levels of the system.</p>	<p>This recommendation is likely to have a substantial benefit for Māori health but would need to be addressed in the context of recommendations 1 and 2.</p>

	<p>knowledge and practices, including,</p> <p>a) recognition of <b>Iwi boundaries and cultural needs</b> and practices within those boundaries,</p> <p>b) <b>protection and replenishment of mahinga kai</b> including restoring waterways and forests, and vegetation or fauna and flora, and</p> <p>c) resourcing <b>iwi Māori partnership boards (IMPBs)</b> to monitor and report on the physical environment for food growing and gathering.</p>	<p>b) Work to review and replace the National Policy Statement for Freshwater Management 2020 has begun and is expected to take 18-24 months, including consultation. This work is being led by MfE, and Ministry of Health officials will be involved to provide advice on health implications.</p> <p>c) National reporting on the state of the environment is part of the MfE’s monitoring system. The role of Iwi-Māori Partnership Boards (IMPBs) is still under development, and monitoring and reporting on the physical environment for mara and mahinga kai may not be reasonably in scope of their work priorities.</p>	
6	<p>That the Minister of Health work with colleagues in Government and industry to <b>improve the nutritional content of food via a comprehensive reformulation programme</b>, which will include compositional limits and mandatory labelling (in cooperation with Australia</p>	<p><b>Reformulation is a complex topic, and could have a substantial positive impact on health outcomes in New Zealand. There are a broad range of options to support reformulation. We suggest further detailed advice is commissioned on this option.</b></p> <p>There is an excess of salt, saturated fat, and sugar in New Zealand’s food supply, which is contributing to adverse health effects, including obesity and diabetes, cardiovascular disease, and kidney disease.</p> <p>Addressing food manufacturing practices to reduce the levels of some nutrients, most commonly salt and sugar, is known as reformulation. Reformulation can change population dietary patterns by improving the nutritional value of processed foods and drinks especially if</p>	<p>Reformulation is evidence-based and likely to have a substantial impact on health and wellbeing outcomes. This is in scope of the menu of evidence-based interventions to address nutrition as a risk factor that you have commissioned. Officials will be providing you with advice on this work shortly.</p> <p>Addressing recommendation 12 would be a helpful contributor to</p>

	<p>under the Joint Food System), and fiscal levers to drive reformulation of processed foods.</p>	<p>these are commonly consumed foods and drinks. It is a cost-effective strategy that has proven to have greater impact on health outcomes than education or health promotion.<sup>6</sup></p> <p>New Zealand has voluntary reformulation targets, developed and monitored by the Heart Foundation. As a voluntary approach, this arrangement has had only a modest impact on food reformulation.</p> <p>Internationally, good results from food reformulation have been achieved by increasing food categories covered by reformulation, strong engagement with industry, clear leadership by Government, and transparent monitoring of industry progress. One example is the UK's sugar-sweetened beverages levy, introduced in 2018, which has driven industry reformulation.</p> <p>There is potential to explore a range of options relating to reformulation, including mandatory vs voluntary standards, and how these would be monitored. An ongoing or periodic national nutrition survey (see recommendation 12) would inform work on these types of interventions, and enable their impact to be monitored.</p> <p>The World Health Organization (WHO) has identified setting national targets and reformulation of processed foods as a "best buy" for preventing non-communicable diseases. While mandatory targets are considered more effective than voluntary targets, they require enforcement to be most effective.</p> <p>The existing Health Star Rating (HSR) is one tool that can support reformulation by rewarding products, where reformulation has improved the nutritional value of the food, with more stars.</p> <p>A food system approach could also look to explore the opportunity and new advances of including the environmental footprint labelling of New Zealand foods. The nutritional elements of these environmental footprint labels and the implications for diets that meet nutrient requirements could also be considered.<sup>7</sup></p>	<p>progress this work and monitor over time.</p>
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<sup>6</sup> Cleghorn C, Blakely T, Jones A, et al. 2019. *Feasible diet intervention options to improve health and save costs for the New Zealand population*. URL: [https://www.otago.ac.nz/\\_data/assets/pdf\\_file/0025/331783/feasible-diet-intervention-options-to-improve-health-and-save-costs-for-the-new-zealand-population-715115.pdf](https://www.otago.ac.nz/_data/assets/pdf_file/0025/331783/feasible-diet-intervention-options-to-improve-health-and-save-costs-for-the-new-zealand-population-715115.pdf)

<sup>7</sup> [Environmental footprinting of New Zealand agricultural products and implications for food nutrition | New Zealand Science Review \(victoria.ac.nz\)](#)

<p>7</p>	<p>That the Minister of Health work with colleagues in Government to <b>implement regulatory measures which aim to provide a healthy food environment for children and young people</b>, including:</p> <p>a) legislative <b>restrictions on the marketing, advertising and sponsorship of unhealthy food</b> and drinks which children and young people are exposed to, including digital content,</p> <p>b) <b>healthy food and drink policies</b> in schools and other child focussed settings, and</p> <p>c) using <b>fiscal measures</b> to support children's healthy food consumption, for example a levy on sugar sweetened beverages.</p>	<p><b>What children and young people eat and are exposed to in the food environment has a substantial impact on their lifelong wellbeing. There are a number of regulatory and non-regulatory interventions that would help to improve the food environment for children and young people. Addressing recommendations 1 and 2 would help enable cross-government consideration of these options.</b></p> <p>Access to good nutrition is fundamental to a child's growth and development. Advertising high fat, salt and sugary foods to children is widespread. High intake of sugary foods also disproportionately impacts the oral health of Māori children and young people.</p> <p>The relationship between sport sponsorship and influences on children's food choices is well documented.</p> <p>a) The Advertising Standards Authority (ASA) in New Zealand has established self-regulatory codes and standards for advertising. The ASA has recently released new Codes for Children's Advertising and Food and Beverage Advertising. The new Codes address some of the issues raised in the Report (<a href="https://www.asa.co.nz/codes/codes/food-and-beverage-advertising-code/">https://www.asa.co.nz/codes/codes/food-and-beverage-advertising-code/</a>).</p> <p>Options for action range from maintaining voluntary industry-led/self-regulatory approaches through to buy-outs of sponsorship and advertising and legislation and government regulation. Introducing a combination of regulatory and non-regulatory interventions would help improve health outcomes, particularly for Māori and Pacific peoples. This recognises that what people eat is usually influenced by the broader environment in which they live.</p> <p>The use of stronger regulation would align with WHO guidance on reducing the impact of marketing and exposure of children to foods high in saturated fats, trans-fatty acids, free sugars, or salt (HFSS). Marketing and advertising restrictions could be included in scope of a Food Act review.</p> <p>The UK is moving to reduce the impact of childhood obesity by further tightening staged restrictions introduced in 2007 on advertising HFSS to children. A total ban on TV and online advertising of HFSS to children is about to be introduced.</p>	
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		<p>Previously commissioned surveys have shown strong public support for restricting junk food advertising to children.</p> <p>b) International evidence sets out the relationship between healthy and nutritious food, physical activity, academic achievement and physical and mental health. Lifelong food and drink preferences and eating behaviours are formed in childhood and children spend a significant proportion of their day at school.</p> <p>There is inconsistent availability of healthy foods in schools across the country despite recent efforts to improve these standards. 40% of primary schools have a written food policy, with few of these being comprehensive. National Administration Guidelines require school boards of trustees to promote healthy food and nutrition for all students, however, these guidelines are not applied consistently. These Guidelines could be extended to include food provision.</p> <p>Work by the NPHS and Ministry of Health has focussed on supporting healthy food policies through the Healthy Active Learning initiative in the schools and early learning services where this initiative is being implemented. Healthy Active Learning is an inter-agency initiative with Sport New Zealand, Health New Zealand, and the Ministries of Education and Health which aims to create healthy environments in schools and early learning settings through quality physical activity and healthy food and water only policies.</p> <p>Specifically, the NPHS has a health promotion nutrition workforce working in education settings from early learning services through to secondary schools. This workforce supports education settings to improve their overall food and drink environment, which includes having and implementing healthy food and drink policies. There are opportunities to strengthen and/or expand this programme.</p> <p>c) Health gains can be made by reducing the availability of foods high in saturated fat, salt and sugar, and by rebalancing diets towards healthier food. Responding to recommendation 6 is likely to have flow-on effects for children’s healthy food consumption.</p> <p>The Ministry of Health has been supporting the work of MPI to improve labelling on packaged foods, such as added sugars, and the Health Star Rating labelling system. There are New Zealand-specific eating and activity guidelines as well as associated health education resources for pregnant and breastfeeding women, and children and young people available via the Health</p>	
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		New Zealand website. Further information on the role of fiscal measures can be provided if requested.	
8	That the Minister of Health work with colleagues in Government to <b>review and amend the Local Government Act</b> to strengthen the ability of local government to take action to improve local food environments, including in protecting areas significant for food production and preventing food deserts.	<p><b>The Local Government Act is administered by Department of Internal Affairs. Ministry of Health officials could provide input into any proposed amendments. Addressing recommendations 1 and 2 would help enable cross-government consideration of these options.</b></p> <p>The health promotion, protection and health in all policies groups of the NPHS work closely with local governments on matters related to food environments.</p> <p>There are other pieces of legislation that could be amended with these principles in mind, for example the Food Act and the Resource Management Act. Health officials are currently engaged in cross-agency work related to resource management reform.</p> <p>Note, the primary objective of the <i>National Policy Statement for Highly Productive Land</i><sup>8</sup> is to protect highly productive for use in land-based primary production for every generation. It was gazetted in 2022 and recognises the unique land and soil characteristics of highly productive land that make it exceptional for food production<sup>9</sup>. It also aims to protect highly productive land from the irreversible loss and expansion of urban growth and lifestyle block development that has disproportionately encroached onto highly productive land.</p>	
<b><i>Eliminate food insecurity for all New Zealanders</i></b>			
9	That the Minister of Health work with colleagues in Government to <b>support a more resilient and sustainable approach to</b>	<b>Food insecurity is one of the greatest threats to good nutrition in New Zealand. There is no clear ministerial responsibility or government agency with full responsibility for food security. Addressing recommendations 1, 2 and 12 may help enable cross-government focus on food security.</b>	This recommendation may be best addressed through including a focus on food security in addressing recommendations 1 and 2.

<sup>8</sup> [National Policy Statement for Highly Productive Land | Ministry for the Environment](#)

<sup>9</sup> [Our land 2024 | Ministry for the Environment](#)

	<p><b>ensuring food security</b> for all New Zealanders, including:</p> <p>a) sustained funding of <b>government led initiatives</b> such as MSD’s Food Secure Communities work programme,</p> <p>b) resourcing community organisations and local authorities to build <b>resilient, mana-enhancing approaches</b> such as food co-operatives, mara kai and community gardens, and</p> <p>c) <b>building on lessons</b> from events such as COVID-19 and Cyclone Gabrielle to build resilient food systems and networks.</p>	<p>Food insecurity is one of the most significant barriers to achieving positive nutrition-related health, wellbeing and social outcomes for all New Zealanders. It impacts not only the quantity of food provided, but also the quality and variety of food, which in turn affects the range of nutrients available. Children are a particularly vulnerable population group.</p> <p>We are seeing an increase in food insecurity for children in New Zealand. Results from the latest NZ Health Survey suggest that one in five children live in households where food runs out often or sometimes. The need is particularly high for Māori, Pacific and disabled children, as well as those living in the most deprived neighbourhoods.</p> <p>Post-COVID increases in inflation, as well as extreme weather events have created a substantial risk to food security in terms of both access and price.</p> <p>Health New Zealand, through the NPHS, provides advice to local and regional government/communities to develop and sustain local food systems (see recommendation 4).</p> <p>The budget for such initiatives would likely come from outside Vote Health. For example, there is current funding available via MSD’s Food Secure Communities Work Programme but this is time-limited until June 2025</p> <p>Food security and food system resilience (particularly in the face of climate change) would be an important area of focus of a ministerial portfolio/forum for the food system (see recommendation 2).</p> <p>The ongoing provision of food in schools, as recently announced, is an important contributor to food security for children (refer recommendation 10d).</p>	
10	<p>That the Minister of Health work with colleagues in Government to support food security and nutrition in pregnancy, breastfeeding and childhood through targeted interventions including:</p>	<p><b>Food security in pregnancy, breastfeeding and childhood is particularly important, given the lifelong impact of poor nutrition in early years. There is no clear ministerial responsibility or government agency with full responsibility for food security. Addressing recommendations 1, 2 and 12 may help enable cross-government focus on food security.</b></p> <p>a) This would require advice from other agencies, which has not been possible in the timeframe available. There are New Zealand-specific eating and activity guidelines for pregnant and</p>	

	<p>a) providing <b>income support</b> from pregnancy through first 1000 days,</p> <p>b) extended <b>parental leave</b> policies,</p> <p>c) working with existing providers to increase the provision of <b>support for breastfeeding and infant nutrition</b>, and</p> <p>d) expanding <b>food in schools programmes</b> (e.g. Ka Ora Ka Ako) to ensure that all children experiencing food insecurity have access to nutritious food in education settings.</p>	<p>breastfeeding women and children from birth to 2 years. These guidelines could inform food budgets for income support.</p> <p>b) This would require advice from other agencies, which has not been possible in the timeframe available.</p> <p>c) Health New Zealand provides support for breast feeding including via Kahu Taurima, maternity and midwifery services, safe sleep programmes, and NPHS promotional campaigns and resources.</p> <p>d) The Ministry of Health continues to recommend that the provision of food in schools is nutritious and of sufficient quantity and quality for learners, and there are opportunities to widen the benefits by, for example, procuring locally and sustainably grown food.</p>	
11	<p>That the Minister of Health work with colleagues in Government to <b>strengthen actions to tackle poverty and reduce cost-of-living and food affordability pressures</b>, including:</p> <p>a) implementing <b>fiscal measures</b> to reduce the cost of fruit and vegetables and other core foods or</p>	<p><b>Food security is one of the greatest threats to good nutrition in New Zealand. Current pressures on cost-of-living and food affordability are exacerbating food insecurity. These pressures may also be influencing people’s ability to access healthy food in favour of less healthy alternatives. The tools to address this recommendation sit outside the health portfolio. Addressing recommendations 1, 2 and 12 would help enable cross-government consideration of these options. Recommendation 6 (Reformulation) will also support improved nutrition, particularly if the focus is on commonly consumed foods.</b></p> <p>Improving food environments is complicated as responsibility for different aspects of the system sit across different government departments or agencies. The budget for most of these initiatives would likely come from outside Vote Health.</p>	

	<p>increase income available for healthy food, and</p> <p>b) working with the Grocery Commissioner to ensure actions to diversify the food supply result in improvements in food security.</p>	<p>Vegetables and fruit and other core foods are unaffordable for many families, while unhealthy foods and drinks are often heavily discounted via point-of-purchase promotions.</p> <p>There is growing international evidence on the impact of different fiscal measures to reduce the affordability of unhealthy food options (eg, a sugar sweetened beverages levy) and to increase the affordability of healthy options. The impacts include the effect on demand for unhealthy vs healthy products, the impact on equity of access to healthier products, and the ultimate impact on population-level health gains.</p> <p>International evidence about fiscal measures must be carefully interpreted when considering application in the New Zealand context. For example, our GST system means that removing GST off vegetables and fruits may not result in a direct decrease in price.</p> <p>Considering the New Zealand context, it is also important to note that outdoor vegetable production, and other food types, are limited to the availability of highly productive land.</p> <p>In addition, international research suggests that food processes are, and will continue to be, influenced by extreme weather events.<sup>10</sup> In New Zealand, in April 2023 compared with April 2022, vegetable and fruit prices increased by 22.5 percent (Stats NZ, 2023).<sup>11</sup> This was the result of a combination of interacting factors, including recent extreme weather events (such as the Auckland floods and Cyclone Gabrielle).<sup>12</sup> Vegetable and fruit prices more recently fell by 9 percent between February 2023 and February 2024 (Stats NZ, 2024).<sup>13</sup></p>	
<p><b><i>Embed a programme of data collection, research, monitoring and surveillance within our food system</i></b></p>			
12	<p>That the Minister of Health work with colleagues in Government to <b>fund</b></p>	<p><b>We do not have up to date information on dietary intake and nutritional status in New Zealand. Without this information, it is challenging to provide evidence-based policy</b></p>	

<sup>10</sup> Kotz, M., F. Kuik, E. Lis and C. Nickel (2024). "Global warming and heat extremes to enhance inflationary pressures." *Communications Earth & Environment* 5: 116.

<sup>11</sup> [Food price index: April 2023 | Stats NZ](#)

<sup>12</sup> [Extreme weather continues to impact food prices, with long tail of cyclone effects expected \(Foodstuffs North Island, 2023\)](#)

<sup>13</sup> <https://www.stats.govt.nz/information-releases/selected-price-indexes-february-2024/>

	<p><b>implementation of a regular child and adult national nutrition survey(s)</b> to monitor dietary intake and identify priorities for nutrition-related policy.</p>	<p><b>advice or to monitor the impact of any changes or initiatives. Funding an ongoing, national nutrition survey would support progress in this area.</b></p> <p>You were previously provided with advice regarding a national nutrition survey (H2023033897 and H2024036866 refers).</p> <p>In summary, our current understanding of nutrition status in New Zealand is limited and outdated. A stand-alone survey on nutrition was last conducted for adults in 2008/2009 and for children in 2002/2003. The need for up-to-date information on dietary intake and nutritional status (including measuring blood levels), as well as the food environment more broadly, is well known and acknowledged across the health sector, and food industry. The barrier to this is budgetary.</p> <p>From 2021 to 2023, the Ministry of Health and MPI commissioned development of a national nutrition survey tool at a cost of \$1.25 million. This survey tool is now ready to use, but additional funding is required for its implementation.</p> <p>The evidence and insights derived from a national nutrition survey would have benefits across multiple government portfolios. For example, this information would enable national food policy to stand up to scrutiny from international organisations such as the World Trade Organization (WTO). It would also enable independent research.</p> <p>If a New Zealand food system ministerial forum was established, as per recommendation 2, that forum may wish to take advice on how best to respond to this recommendation.</p> <p>In the near term, you may wish to commission key agencies (the Ministry of Health and MPI) to provide updated advice on the costs and options for implementing a national nutrition survey including options for ongoing funding (eg, via a food industry levy), and/or in preparation for a future budget bid.</p>	
13	<p>That the Minister of Health work with colleagues in Government to <b>develop and implement a national monitoring framework</b> to</p>	<p><b>It would be important to ensure that any new food system strategy would be able to be monitored. Acting on recommendation 2 would be important to progress this recommendation. There are a number of existing information sources that could be utilised for monitoring. Recommendation 12 (a National Nutrition Survey) would be an important additional component of a national monitoring framework.</b></p>	

	<p>provide resources, data and tools assess the impacts of local and national food system interventions and policies on health and wellbeing, as part of a National Food Strategy.</p>	<p>The PHA leads a Healthy Food Environments Steering Group that brings together leaders across the public health sector for food environments (H2024036866 refers).</p> <p>The steering group has developed a draft healthy food environment framework (H2024036866 refers). The PHA are now developing a baseline monitoring report. There are a number of existing sources of information for monitoring national, regional and local health and wellbeing (e.g. NZ Health Survey). The baseline monitoring report aims to provide an overview of the data sources available and identify any relevant gaps.</p> <p>In taking a food systems perspective, it would be beneficial to widen the scope beyond health and wellbeing indicators in a national monitoring framework. It could encompass indicators as part of environmental reporting, food waste, freshwater farms plans, etc to determine if interventions are making a difference that is informed by consistent and standardised data and evidence.</p> <p>The National Sciences Challenge Healthier Lives national research programme was launched in 2015 with \$31.3 million of funding over 9 years. This investment is administered by MBIE. A key theme of this programme is healthy food and physical activity environments. As this funding comes to an end there may be a gap for investment in independent research into our food environment. The National Science Challenge directors called for a national food strategy in July 2023.</p>	
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## Appendix 2 - Proposed talking points on the PHAC Report – rebalancing our food system

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PROACTIVELY RELEASED

s 9(2)(g)(i)

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