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**Submission from the Dietitians Association of Australia
to National Health and Medical Research Council**

**A NEW FOOD GUIDANCE SYSTEM FOR AUSTRALIA-
FOUNDATION AND TOTAL DIETS**

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 4000 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for better food, better health, and better living for all.

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DAA is pleased to provide comment on the draft 'A new food guidance system for Australia-Foundation and Total Diets'. This revision of the document is a welcome addition to public health resources in Australia, although it is unfortunate that the systematic literature review was not completed and publicly available prior to commencement of the revision of the Core Food Groups (1994). This would not only have supported the revision itself in a timely fashion, but would enable stakeholders to consider the evidence for the Foundation and Total Diets project at the point of consultation.

The methodology clearly states the Nutrient Reference Values (NRVs) were used for modelling. As NRVs are specifically designed for healthy population groups it would not be appropriate to extrapolate them for people with established chronic disease states or other health conditions. DAA is concerned that these terms of use are not made clear enough in the draft. Feedback from our members indicates the likelihood that the recommendations will be inappropriately applied to other populations with specific needs. Consequently we recommend a brief addition advising against misuse. For example, we suggest that on page 16 in the 'Introduction', at the end of the fourth paragraph, the addition: '*the Nutrient Reference Values and recommendations in this report are designed for healthy population groups, not for those with established health conditions such as chronic disease*'. It may also be beneficial to include this information in the Executive Summary.

Feedback from DAA members indicates support for the consideration of environmental and sustainability issues in the course of developing the Foundation Diets, while acknowledging the limited evidence base available to inform this area at this time.

DAA recognises limitations in the modelling which were beyond control of the NHMRC but makes the following points to advocate for improvements in monitoring and surveillance of the food supply and food intake in Australia:

1. The Foundation and Total Diets recommendations use the 1995 National Nutrition Survey for adults and the 2007 Australian National Children's Nutrition and Physical Activity Survey as part of the modelling process. Consequently the results of the most recent National Nutrition Survey for adults are now 15 years old and therefore may not reflect current dietary intakes of Australian adults. DAA recognises that the National Health Risk Survey, which will include the collection of dietary intake data among other health indicators, is currently in development but it is unfortunate that the results of this were not available for use in developing the Foundation and Total Diets.
2. DAA notes that it was necessary to combine data from two food composition databases to support the modelling in the project. Ideally it would only be necessary to use one comprehensive, up-to-date food composition database which is representative of foods available for consumption in Australia. DAA is aware that Food Standards Australia New Zealand (FSANZ) has a database redevelopment program in progress and strongly supports regular updates of its food composition program.
3. Regular monitoring and reporting of the Australian food supply is also supported by DAA. Data on the availability of foods for domestic consumption allows us to compare the food supply with suggested consumption targets to ensure estimates made in modelling are realistic.

In the course of using the Foundation and Total Diets to inform the writing of the Dietary Guidelines and development of the food guide, DAA encourages the NHMRC to consider the following issues:

1. Serve sizes for the final food groups should be understood by consumers and be practical. DAA recommend that research informs the development of serve sizes for each food group, particularly with respect to appropriate serve sizes for both adults and children.
2. Given that modelling demonstrated difficulty in achieving RDIs for some key nutrients such as iron, DAA also recommends that guidance about the necessity for vitamin and mineral supplementation for some groups be considered when writing the dietary guidelines. While the use of serves of food per week rather than per day is useful for the purpose of the Foundation and Total Diets, consumer research would be helpful in how to present number of serves and frequency in the food guide.
3. The results of the seven-day diets, particularly the higher energy total diets, demonstrate the difficulty of containing sodium intake. Consequently lower salt choices should be emphasised in the writing of the dietary guidelines.

Overall, DAA supports the draft Foundation and Total Diets but believes people who use this document should be made fully aware that it is intended for healthy Australian population groups. We also strongly encourage the government to commit to resourcing a more up-to-date and complete national food composition database and regular national health surveys which include adequate dietary intake data collection.