



AUSTRALIAN FOOD SOVEREIGNTY ALLIANCE

**Submission to the Food Regulation Standing Committee:
*A response to the Public Consultation Regulation Impact Statement –
Labelling of sugars on packaged foods and drinks***

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Australian Food Sovereignty Alliance

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About the Australian Food Sovereignty Alliance (AFSA)

The Australian Food Sovereignty Alliance (**AFSA**) is a collaboration of organisations and individuals working together towards a food system in which people can create, manage, and choose their food supply and distribution system. AFSA is an independent organisation and is not aligned with any political party. We have more than 700 individual, organisational, business, and farm members.

In 2014 we established a producers' branch of AFSA, Fair Food Farmers United (FFFU) to provide a balanced voice to represent farmers and advocate for fair pricing for those selling to the domestic market, connect Australian farmers for farmer-to-farmer knowledge sharing, and to be a voice for farmer-friendly regulations and standards.

We are part of a robust global network of farmer-led organisations involved in food security and food sovereignty policy development and advocacy. We are members of the International Planning Committee for Food Sovereignty (IPC), Urgenci: the International Network for Community-Supported Agriculture, and La Via Campesina – the global movement of peasant farmers, and we have strong relationships with Slow Food International and its Australian chapters. We also provide support for the Australasian representative on the Civil Society Mechanism (CSM), which relates to the Committee on World Food Security (CFS).

We work extensively with primary food producers and consumers across every state and territory in Australia. Our committee has consisted of published academics and lecturers from the University of Melbourne, RMIT, Deakin University, University of Tasmania, University of Sydney, and QUT. We have also had representation from farmers from every state, and local advocates and campaigners such as Food Connect, Friends of the Earth, Regrarians, Fair Food Brisbane, and the Permaculture Network.

Our vision is to enable regenerative farms to thrive, and people everywhere to have a choice in what they eat.

Australians increasingly care about the way their food is produced, including its social and environmental impacts. They seek out food that is grown locally and without damage to the environment. Food produced on small regenerative farms is in strong demand, and we believe that it is critical that government heeds changing community expectations and facilitates, supports and encourages the growth and viability of regenerative agriculture while protecting the environment and human and animal health.

Background

Earlier this year, Australia and New Zealand Ministerial Forum on Food Regulation (the Forum) announced it would begin investigating labelling approaches for providing information on sugars on packaged food and drinks.

Later, the Forum released its Food Regulation's priorities for 2017 – 2021:

- Foodborne Illness Reduction Strategy 2018-2021
- Food safety in the retail sector
- Food safety in horticulture products
- Reducing obesity and chronic disease
- Sugar labelling
- Targeting fat and oils health concerns
- Addressing concerns re: human milk
- Health star ratings update
- Sugar-free and carb-free claims in alcohol

At the request of the Forum, the Food Regulation Standing Committee (FRSC) has given policy advice to the Forum to support consideration of options for labelling of sugars. The Forum and FRSC agree that “[i]nformation about sugar provided on food labels in Australia and New Zealand does not provide adequate contextual information to enable consumers to make informed choices in support of dietary guidelines.”

The Consultation paper seeks information from stakeholders about labelling of sugars on foods and drinks to allow FRSC to identify a preferred policy option and make a recommendation to the Forum in relation to sugar labelling.

The FRSC has produced six options in addition to the status quo:

1. Status quo
2. Education on how to read and interpret labelling information about sugars
3. Change the statement of ingredients to overtly identify sugar-based ingredients
4. Added sugars quantified in the nutrition information panel (NIP)
5. Advisory labels for foods high in added sugar
6. Pictorial display of the amount of sugars and/or added sugars in a serving of food
7. Digital linking to off label web-based information about added sugar content.

The Forum will consider FRSC's recommendation on potential changes to food and drink labels in relation to sugars to enable consumers to make informed choices in support of the dietary guidelines. Implementation of the preferred option(s) (provided it is not the status quo) would be undertaken by Government or industry, depending on whether the implementation mechanism is regulatory or non-regulatory. The Forum is considering regulatory and non-regulatory options for labelling of sugars on packaged foods and drinks for sale in Australia and New Zealand.

We thank the Committee for facilitating this consultation on the labelling of sugars. As a key food industry stakeholder recognised by the United Nations as well as national, state, and local governments across Australia, we have prepared this submission on the Consultation Paper. While we do not represent farmers or consumers in the New Zealand context, we support better regulatory protections for New Zealand in relation to public health and food and farming policy.

Executive Summary

This submission intends to contribute information that may assist the Forum’s consideration of options for labelling of sugars on packaged foods and drinks for sale in Australia and New Zealand.

We agree with the FRSC that *food labels should provide adequate contextual information about sugars to enable consumers to make informed choices in support of the dietary guidelines.*¹

The FRSC has stated it will consider a “range of factors that are broader than food labelling influences on consumer behaviour and dietary intakes” to support informed choices, rather than specifically reducing intakes of sugars, overweight and obesity, or dental caries. The Australian Food Sovereignty Alliance (AFSA) believes the FRSC will be more effective in addressing the policy issue and achieving the desired outcome if they consider principles of food sovereignty, the assertion of the collective right of communities and peoples to democratically make and implement key decisions about their food and farming systems.

Food sovereignty asserts the right to nourishing and culturally appropriate food produced and distributed in ecologically sound and ethical ways, and the communities’ right to collectively determine their own food and agriculture systems.

Food and farming policies are inextricably linked with public health and the obesity epidemic. AFSA has developed a policy towards sugar taxes and further advanced this policy in regards to labelling of sugars on packaged foods and drinks.

AFSA’s Relevant Policies

Sugar Taxes and Labelling

AFSA believes that not all sugar is made equal. Food and beverage industry companies have been left to self-regulate, encouraging top-down decisions about what is regarded as ‘healthy or ‘unhealthy’ food. As a result, direct impacts are visible concerning public health and a lack of corporate social responsibility and transparency. Allowing

¹ FRSC considers that ‘contextual information’ in this situation relates to information that can support consumers to use and interpret a food label.

corporations to determine the acceptable criteria for the contents of food and beverages is not food sovereignty. Food sovereignty occurs where communities can decide on how these criteria are defined and how food production-consumption networks are (or are not) regulated.

AFSA supports the notion that producers and food and beverage companies are to be held to account. Corporations rather than consumers ought to be taxed and disincentivised from marketing high-sugar and high-carbohydrate foods, so that the burden of cost is laden on those ultimately responsible, rather than consumers. We are not in favour of a sugar tax on consumers as this only penalises individuals in the face of systemic problems.

We support governments and food regulation authorities targeting and addressing the direct relationship between the advertising and consumption of food and beverages with high sugar (and added sugar) content. We support a holistic approach towards sugar policies as they are inseparable from food and farming policies and require consideration of the perspective of not only consumers and health specialists, but also farmers.

The Right to Food

AFSA supports the Right to Food. The Right to Food is now a well-established concept world over. As a signatory to the United Nations (UN) Covenant on Economic, Social and Cultural Rights, Australia is bound to ensure the full enjoyment of the universal human rights it outlines, include the right to adequate food.² That obligation includes *respecting, protecting, facilitating* and *providing* access to adequate food to ensure food security and healthy livelihoods.³

Regulation of Food

AFSA supports fair, consistent, transparent and scale-appropriate application of the regulation of food to ensure it is produced and distributed safely.

In contrast to regulation, prohibition creates the dilemma that should people persist in accessing a prohibited food, there is not consistent regulated process governing its production and distribution. The public health risks therefore remain for people who continue to access such food. The human reality is that some people choose for reasons

² Article 2 of the International Covenant on Economic, Social and Cultural Rights (ICESCR).

³ United Nations Human Rights Office of the High Commissioner, Special Rapporteur on the Right to Food, <<http://www.ohchr.org/EN/Issues/Food/Pages/FoodIndex.aspx>>.

of personal and cultural beliefs to access such foods even if prohibited.

For all of these reasons AFSA favours fair and consistent regulation, built in democratic consultation with all stakeholder groups, for all foods.

Labelling

AFSA also supports a national, comprehensive labelling system, including GM, nanotechnology, sustainable fisheries, food irradiation, palm oil, and other social and environmental standards.

Summary of Recommendations

Recommendation 1: Nutrition-sensitive agriculture should be supported.

Recommendation 2: Australia's decision on labelling will have broader effects on the Asia-Pacific region, and greater incentives and institutional innovations in support of smallholder farmers in this region should be implemented.

Recommendation 3: Consider principles of Food Sovereignty.

Recommendation 4: Stop the proliferation of harmful sugar substitutes and artificial sweeteners.

Recommendation 5: Consider the Peoples' Food Plan as part of the FRSC's holistic decision-making approach

Recommendation 6: Make it a national priority to improve Australia's observance of our international obligation to ensure the Right to Food.

Evidence to support the FRSC

Recommendation 1: Nutrition-sensitive agriculture should be supported

Australia's food supply and agriculture system are export-oriented. Australia-based scholars such as Carol Richards and Jane Dixon advocate nutrition-sensitive agriculture in response to this issue.

Nutrition-sensitive agriculture can help to alleviate the spread of diet-related non-communicable diseases (NCDs). The UN System High Level Task Force on Global Food Security 2012 too have observed and attempted to address high calorie and low nutrient diets by looking to agriculture as a part of the solution.

“More than one billion people have sufficient calories but insufficient nutrients has raised questions regarding the links between the health of populations and the health of agriculture. Nutrition-sensitive agriculture has become a proxy for food supplies that contain less sugar, salt, animal-saturated and other trans fats, and higher amounts of fruit, vegetables and pulses.”⁴

Dixon and Richards’ paper identified nutrition-sensitive agriculture as one of the two key drivers of food security, alongside household incomes. To ensure Australians are healthier and consume less sugar and added sugar in food and beverages, the government needs an agricultural sector that delivers dietary diversity via a fair, sustainable and sovereign food system.

Governments currently support capital intensive agriculture in order to deliver cheap food and produce high-value protein and bulk carbohydrates for export markets. The In 2012, the Australian sugar industry exported 70 percent of its produce.⁵ Producing and exporting sugar involved exporting the water irrigated and licensed to grow it. Australia’s precious water resources are at stake and changes in policies towards sugar consumption will ultimately affect our water.

Along with wheat and beef, sugar is a bulk commodity, making it more impactful than other crops on the robustness and agroecological diversity of Australia’s agricultural industry. The FRSC should take into account the relative importance of industrial and alternative food subsystems when considering labelling of sugars because the new labelling will shape the consumption and growth of sugar.

⁴ Dixon J and Richards C, 2015, On food security and alternative food networks: understanding and performing food security in the context of urban bias, Springer Science+Business Media Dordrecht.
⁵ABS. 2012b. Year book Australia, 2012: Farming in Australia, Canberra: Australian Bureau of Statistics.

Recommendation 2: Australia's decision on labelling will have broader effects on the Asia-Pacific region.

The Food and Agriculture Organisation (FAO) Regional Conference for Asia and the Pacific's Roundtable session in Fiji in April this year reported that the the availability and consumption of ultra-processed foods that are high in salt, sugar or fat are increasing substantially. Consequently, obesity rates are climbing in all countries, and have already reached extremely high levels in Pacific island countries. Without changes in diets, the burden of NCDs such as cardiovascular diseases and diabetes will be very high by 2050 and possibly even earlier.⁶

With these considerations in mind, many countries in Asia and the Pacific are experimenting with taxes on such foods. These taxes are proving to be controversial: while they have the potential to reduce the consumption of such foods, thus improving nutrition and reducing the burden of disease, they might also affect a range of farmers (e.g. those who grow sugar and oilseeds) and those who are employed in the distribution chains for those foods.

The FAO emphasises that the Asia and Pacific region is experiencing rapid economic growth, urbanisation and major demographic shifts. These factors have led to dietary diversification and a structural transformation of the economy, with an increasing role for non-farm income due to technology. Diets have transitioned away from traditional staple crops towards imported cereal-based products (white rice, wheat flour, white bread) that are lower in essential micronutrients such as vitamin A and iron; as well as processed, energy-dense foods high in salt, sugar and fat. Pacific small island developing nations now make up the top seven most obese countries in the world, and seven of the ten countries with the highest diabetes prevalence in the world.⁷

AFSA submits that these trends and technologies have potentially profound implications for the livelihoods of smallholder farmers in Asia and the Pacific, as well as for the management of natural resources, and the organisation of food systems, especially in the context of climate change.

⁶ FAO, March 2018, Round Table on Imagining Future Healthy and Inclusive Food Systems in Asia and the Pacific, accessed at: <<http://www.fao.org/3/MV747en/mv747en.pdf>>.

⁷ World Bank. 2016. Pacific Possible: Health and Non-Communicable Diseases. Background Paper.

The impact of these trends on food security and nutrition therefore needs a multi-faceted approach, encompassing greater incentives and institutional innovations in support of smallholder farmers in this region.

Recommendation 3: Consider principles of Food Sovereignty

Food sovereignty asserts the right of peoples to nourishing and culturally appropriate food produced and distributed in ecologically sound and ethical ways, and their right to collectively determine their own food and agriculture systems.

The international food sovereignty movement has developed six defining principles.

Food sovereignty:

1. **Focuses on food for people:** The right to food which is healthy and culturally appropriate is the basic legal demand underpinning food sovereignty. Guaranteeing it requires policies which support diversified food production in each region and country. Food is not simply another commodity to be traded or speculated on for profit.
2. **Values food providers:** Many smallholder farmers suffer violence, marginalisation and racism from corporate landowners and governments. People are often pushed off their land by mining concerns or agribusiness. Agricultural workers can face severe exploitation and even bonded labour. Although women produce most of the food in the global south, their role and knowledge are often ignored, and their rights to resources and as workers are violated. Food sovereignty asserts food providers' right to live and work in dignity.
3. **Localises food systems:** Food must be seen primarily as sustenance for the community and only secondarily as something to be traded. Under food sovereignty, local and regional provision takes precedence over supplying distant markets, and export-orientated agriculture is rejected. The 'free trade' policies which prevent developing countries from protecting their own agriculture, for example through subsidies and tariffs, are also inimical to food sovereignty.
4. **Puts control locally:** Food sovereignty places control over territory, land, grazing, water, seeds, livestock and fish populations on local food providers and respects their rights. They can use and share them in socially and environmentally sustainable ways which conserve diversity. Privatisation of such resources, for example through intellectual property rights regimes or commercial contracts, is explicitly rejected.

5. **Builds knowledge and skills:** Technologies, such as genetic engineering, that undermine food providers' ability to develop and pass on knowledge and skills needed for localised food systems are rejected. Instead, food sovereignty calls for appropriate research systems to support the development of agricultural knowledge and skills.
6. **Works with nature:** Food sovereignty requires production and distribution systems that protect natural resources and reduce greenhouse gas emissions, avoiding energy-intensive industrial methods that damage the environment and the health of those that inhabit it.

Recommendation 4: Stop the proliferation of harmful sugar substitutes and artificial sweeteners.

Sugar substitutes and intense artificial sweeteners are proliferating in production and variety. These include table top sugar substitutes such as powdered sweeteners, and a range of powdered beverages including fruit flavoured drinks, milks and flavoured milk drinks, instant tea and coffee, and protein drinks.

While research results regarding the risks to public health are inconclusive, it is clear that we have largely left one authority responsible to regulate such ingestible substances. The Food Standards Authority Australia New Zealand (FSANZ) conducts pre-market risk analysis to examine and assess public health and safety risks associated with food. However, many potential risks in different food additives, such as Advantame, involve regulatory issues because often at the time the application is received, no other country will have completed a toxicological assessment. Therefore, no acceptable daily intake (ADI) for the product had been established, leaving FSANZ and the producer to self-determine the risks of the product, the maximum ADI and Good Manufacturing Practice (GMP) protocols.

Without transparent and peer-reviewed regulation of additives and sweeteners, true and meaningful labelling would be ineffective. Sweeteners and food additives are specifically targeting towards people as part of weight management and loss.

Recommendation 5: Consider the Peoples' Food Plan as part of the FRSC's holistic decision-making approach

In 2010, AFSA created the Peoples' Food Plan as an alternative to a corporate-led, market-driven food policy that ignores household food security and leaves food relief organisations to fill the gap.

It was written in extensive collaboration and consultation with community groups, non-corporate farmers, social entrepreneurs, health and nutrition professionals, trade unionists, academics and other working people. It represents their interests and priorities, not the interests and priorities of big business. The fundamental guiding principles of this Plan were based in the internationally-recognised framework of food sovereignty.

The Peoples' Food Plan reported that the production of wheat, beef, dairy and sugar may decline by as much as 80 percent by 2050 when the combined effects of climate change, reduced water availability, soil erosion, soil salinisation and acidification are taken into account; soil salinity is expected to nearly treble from current levels to affect 17 million hectares by 2050.⁸ This demonstrates the necessity to support agro-ecological farming alongside targeting labelling issues in the food system.

The Plan also called for a national, comprehensive labelling system, including genetic modification, nanotechnology, sustainable fisheries, food irradiation, palm oil, and other social and environmental standards. Participants who engaged in the making of the Plan also demanded improved nutritional security; support for agricultural production systems that reverse the depletion of nutrients from Australian soils and food; support for Australia to produce enough fruit and vegetables to provide everyone with a healthy diet; and for further research to be done into the link between addiction and consumption of sugary, salty and fatty foods

Below is a comparison between the National Food Plan and the Peoples' Food Plan developed in 2012:

⁸ Australian Food Sovereignty Alliance, Peoples' Food Plan, 2012-2013 <https://afsa.org.au/wp-content/uploads/2012/11/AFSA_PFP_WorkingPaper-FINAL-15-Feb-2013.pdf>

APPROACH / ATTITUDE / PRINCIPLE	NATIONAL FOOD PLAN	PEOPLES' FOOD PLAN
Time-frame	20 years	100+ years
Attitude to family farmers	No vision for family farmers – their numbers will continue to decline and they will be replaced by corporate farming models (p 159)	Thriving family farms are at the centre of thriving rural communities, and have a vital role to play in the transition to a sustainable, fair and resilient food future
Attitude to the market	Market-led approach is the best, no or minimal intervention required, either as regards land management and use, or as regards food product development and marketing (p 133) Govt does not propose a shift to sustainable production systems (p201), even though it favours the national application of genetically modified organisms	Market-led approach has demonstrably failed in terms of healthy food for all, sustainably produced, and providing dignified livelihoods for producers and workers Intervention is necessary – to protect prime farmland, to ensure the right to farm for family farmers, to ensure diversity in the retail sector, to encourage sustainable farm practices, to control the junk and fast food industries
Approach to tackling obesity pandemic	Obesity individualised, seen as issue of 'poor food choices' Business-as-usual, reliance on food industry self-regulation, educating consumers about health choices – a failed strategy No new proposals to reduce prevalence of obesity No recognition of the need for a fundamental shift to a healthy and sustainable diet	Obesity is a structural issue, its roots lie in power of food companies to shape food choices – 'the obesogenic environment - & structural subsidies to the junk food industry' Experience elsewhere (e.g. Scandinavia) shows that regulation and intervention is required, including strict controls on advertising to children, and implementation of a sugar / fat tax National Preventative Health Taskforce (2009) recommended these measures as a matter of urgency Must be coupled with comprehensive and national food and nutrition literacy education
Attitude to GM and new technologies	Enthusiastic – develop national strategy for its consistent application, to overcome moratoria in some states, and low consumer acceptance (p153-4)	GM is fundamentally about corporate profit and creating further dependencies for farmers. It has failed to deliver on its promises of increased yields, and has instead delivered super-pests and super-weeds
Approach to food governance and leadership	Decision-making powers reserved to DAFF, with proposed advisory Ministerial Food Forum, Stakeholder Committee on Food and Australian Food Council to 'facilitate dialogue between stakeholders' (p 53) Likely outcome is that the voice of agri-business and food retailers will dominate the Stakeholder Forum and marginalise those of other stakeholders (Food Alliance brief, p5-6)	Key principles for food governance include: <ul style="list-style-type: none"> ■ people and community centred ■ food as a human right ■ promoting wellness and strengthening resilience Food policy at the Federal level should be led by the Department of Health, not DAFF, and with a National Food Council that accords equal participation and real decision-making powers to the community, health, environment, family farming, consumer and diverse food business sectors, as it does to corporate agri-business and large retail The work of the NFC should be informed by a diversity of local and regional Food Policy Councils with multi-stakeholder representation, facilitated by local government and accountable to their local communities

Recommendation 6: Support the Right to Food

The Right to Food obligation is aided by the special mechanisms of the UN, which has been appointing Special Rapporteurs on the Right to Food for over three decades.⁹ It is now being implemented in Constitutions, laws and government-civil society institutions in a growing number of countries and localities around the world, from Ecuador and Venezuela in Latin America, to Nepal in South Asia, to Mali in Africa, to Spain and Italy in Europe, and Maine and Vermont in the United States.

⁹ Food and Agriculture Organization (2012b), Right to Food Timeline, Legal Office, Food and Agriculture Organization of the United Nations, archived from the original on 6 June 2012. <<https://www.webcitation.org/68Cm7UmiN>>

Australia is currently lagging in government policy on the right to food. Indeed, the Department of Agriculture has set out a number of aspirational agricultural and food policies and has set up numerous task groups in order to improve policymaking. However, major determinants of food prices along value-chains are becoming more complex in nature and connection to other factors. Access to food among the population is largely unequal despite our high production rates and competitiveness throughout the export industry.

In order to achieve better success in meeting its obligations, Australian government bodies must address the challenges within the food system, including concentrated control of our fresh food supply and an economic model that limits the possibilities of realising the right to food.¹⁰ This model restricts the role of the State in regulating the domestic food market.

For food labelling to effectively encourage consumers to avoid eating excessive sugar and added sugars, there needs to be additional efforts to increase access to alternatives such as fresh fruit and vegetables.

Australia is an affluent nation that exports around 60% of its food. However, the primary health-related problem faced by Australia's urban poor in relation to food is over-consumption of a narrow range of highly processed fatty, sugary and salty foods leading to obesity and a range of cardiovascular problems.¹¹

Federico Davila and Robert Dyball's research shows that this problem is not so much that healthy alternatives are not physically available, but a complex mix of socio-economic factors, including marketing, affordability and social expectations that make unhealthy food choices appear comparatively affordable and convenient.¹² Therefore, not only do healthy alternatives need to become more affordable, but many other factors need to be considered when changing food policies such as those relating to labelling of sugar. Sugar labelling has the potential to educate and alter consumption of sugar. In that regard, AFSA supports Option 2 in the Consultation Paper.

10 Alana Mann, 11 April 2016, What does the human right to food mean for Australians living in food poverty?, Opinion, <<https://sydney.edu.au/news-opinion/news/2016/04/11/-the-right-to-food---and-how-1-2-million-australians-miss-out.html>>.

11 Federico Davila, & Robert Dyball, 2015, Transforming Food Systems Through Food Sovereignty: An Australian Urban Context, Australian Journal of Environmental Education, vol. 31(1), pp 34–45.

12 Federico Davila, & Robert Dyball, 2015, Transforming Food Systems Through Food Sovereignty: An Australian Urban Context, Australian Journal of Environmental Education, vol. 31(1), pp 34–45.

Concurrently, Australia is ninth highest on the inequality scale among the 26 OECD countries and 14 percent of our population lived below the poverty line in 2014.¹³ Australia is clearly failing to deliver its obligation to guarantee the right to food. This calls for greater governance among Governments and responsible industry bodies.

To become a leading nation in addressing the impacts on the public health as part of reforming our food and farming policies, the FRSC should thoroughly consider the challenges faced by producers, such as increased industrialisation of the food system, climate change and other economic, social and cultural issues. By considering the right to food, the FRSC will be better equipped address these issues.

Australia needs to strengthen its efforts to establish the right to food. Despite the adoption of the *Voluntary Guidelines to support the progressive realisation of the right to adequate food in the context of national food security* by the Food and Agriculture Organisation of the UN (FAO) in 2004, the Right to Food remains unrealised for one out of seven people, globally.

*The Right to Food Guidelines do not provide legal entitlements but provide a framework for the development of national strategies and policies including budgeting and allocation of funds to food security. States including South Africa, Kenya, Switzerland, Bolivia, Ecuador, Mexico and Brazil have made constitutional provisions [guaranteeing the right to food](#) with varying success.*¹⁴

AFSA's contribution to Right to Food

People's Food Plan supported by scholar

Dr Alana Mann, a senior lecturer in the University of Sydney's Department of Media and Communications, and former committee member of AFSA, emphasises the significance of AFSA's work towards the right to food. Dr Alanna Mann is leading a research project at the [Sydney Environment Institute](#) examining the social-cultural dimensions of food security in the Sydney City Local Government Area, where eight of the ten most densely populated and culturally diverse neighbourhoods in Australia are located.¹⁵ She

13 ABC < <http://www.abc.net.au/news/2014-10-12/poverty-levels-among-australians-on-the-rise-across-report-abs/5807624>>.

14 Alana Mann, 11 April 2016, What does the human right to food mean for Australians living in food poverty?, Opinion, <<https://sydney.edu.au/news-opinion/news/2016/04/11/-the-right-to-food---and-how-1-2-million-australians-miss-out.html>>.

15 Alana Mann, 11 April 2016, What does the human right to food mean for Australians living in food poverty?, Opinion, <<https://sydney.edu.au/news-opinion/news/2016/04/11/-the-right-to-food---and-how-1-2-million-australians-miss-out.html>>.

advocates for affordable, accessible and healthy food being made available to everyone, and recommends creating a publicly-funded safety net for the most vulnerable.

Annual Australian Food Sovereignty Convergence

AFSA runs annual Food Sovereignty Convergences. These gatherings encourage participation from attendees including government ministers, our members, farmers, chefs, Aboriginal Traditional Owners and the broader public. The Convergence facilitates wide-ranging and inclusive discussions around the measures needed to promote food sovereignty. At last year's Convergence in Canberra, the topic of 'right to food' in Australia and at a global level was discussed, among many other issues relating to food sovereignty. (See our media release 16 October 2017).

Meeting of the Coordinating Committee of the Civil Society Mechanism

In May 2017, AFSA President Tammi Jonas participated in a Meeting of the Coordinating Committee of the Civil Society Mechanism (CSM) in Italy.

The Civil Society Mechanism (CSM) for relations with the United Nations Committee on World Food Security (CFS) is the largest international space of civil society organisations (CSOs) working to eradicate food insecurity and malnutrition.¹⁶

Participants spoke about wealthy states such as the US 'redlining' the right to food in attempts to stifle discussion about addressing food insecurity in their countries. They emphasised the importance of food and health becoming the centre of the right to food framework.

Anna Treasure

17 hours ago

[Mention of Australia here?](#)

AFSA's Option Preferences

- AFSA expressly **does not support** Option 1: Status Quo.
- AFSA **supports** Option 2: Education on how to read and interpret labelling information about sugars.

¹⁶ Civil Society Mechanism for relations to the UN Committee on World Food Security, What is the CSM? <<http://www.csm4cfs.org/the-csm/>>.

- We **support** Option 3: Change the statement of ingredients to overtly identify sugars-based ingredients.
 - **We note that the statement of ingredients should also include GM labelling.**

- AFSA **supports** Option 4: Added sugars quantified in the nutrition information panel (NIP)

- AFSA **supports** Option 5: Advisory labels for foods high in added sugar

- AFSA **strongly supports** Option 6: Pictorial display of the amount of sugars and/or added sugars in a serving of food.
 - **We note this Option (as well as Options 3 and 4) would be most effective in conjunction with Option 6.**

- AFSA **does not support** Option 7: Digital linking to off label web-based information about added sugar content.

Conclusion

AFSA thanks the FRSC for this opportunity to participate in the consultation process and welcomes the chance to further contribute to the Committee and Forum's policy drafting and decision-making process.