



AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL



AFGC RESPONSE
**Tasmania's 20-Year Preventive Health
Strategy - Stakeholder
Consultation**

23 May 2025

BACKGROUND

CONSULTATION QUESTIONS

The Australian Food and Grocery Council (AFGC) welcomes the opportunity to contribute to the development of Tasmania's 20-year preventive health strategy. As the peak body representing Australia's food, beverage and grocery manufacturing industry, the AFGC supports long-term, evidence-informed strategies that promote population health while fostering innovation, consumer choice, and sustainable industry practices. We commend the Tasmanian Government's commitment to reshaping systems to support healthier lives and acknowledge the importance of prevention as a foundational component of an effective and equitable health system.

This submission responds to the discussion paper's call for input on the aims, focus areas, enablers, and shared roles needed to drive meaningful change in preventive health. Our response draws on the food and grocery industry's experience in contributing to health promotion through responsible product innovation, voluntary reformulation, front-of-pack labelling, consumer education and collaboration across sectors. We support the continuation and evolution of initiatives under the Healthy Tasmania plan and advocate for a flexible, partnership-driven approach that reflects the diversity of Tasmanians and their needs, while encouraging shared accountability across government, industry and the community.

1. What does a healthy, active life mean to you and your community?

Healthy, Active Tasmania 20-Year Preventive Health Strategy 2026–2046

A healthy, active life means having access to nutritious, affordable foods, clear and practical dietary guidance, and opportunities for regular physical activity in safe and inclusive environments. It encompasses not only individual knowledge and choice but also supportive food systems and environments that enable and encourage healthier decisions. For the AFGC and its members, it also means a collaborative effort between industry, government, and the public to create sustainable health outcomes through education, innovation, and shared responsibility.

2. Are the focus areas appropriate for the next 20 years? Why or why not?

Broadly, the five focus areas of creating healthy and supportive environments, strengthening prevention to reduce chronic disease risk, improving nutrition and physical activity, and health equity remain appropriate. However, their success depends on balanced and evidence-based implementation.

The AFGC encourages emphasis on voluntary, collaborative strategies rather than relying solely on regulations within the food environment. Acknowledging the evolving nature of science and food innovation is also essential for long-term effectiveness.

3. Are the enablers appropriate for the next 20 years? Why or why not?

The current enablers — such as whole of government and community approach, leadership, sustainable funding, evidence-based priorities, workforce capacity, and transparency in monitoring and reporting, and consumer empowerment — are relevant but require enhancement.

Strategic partnerships should explicitly include the food industry, which plays a critical role in food reformulation, consumer education, and innovation. Focusing on adaptive, flexible frameworks supported by robust monitoring and evaluation systems will ensure initiatives remain relevant and effective over time.

4. Do you have any example actions that could be considered under each focus area and enabler?

Focus Area: Create and strengthen safe and healthy food environments.

- Promote the Health Star Rating (HSR) system through public education.
- Expand school and community programs that educate on cooking and budgeting for healthy meals.
- Support urban planning that enables physical activity and access to nutritious food.

5. What services and actions are important for your community's health and wellbeing?

- Sustained public education on dietary guidelines and physical activity.
- Healthy eating tools like the HSR system to support informed food choices.
- Access to community facilities that promote active lifestyles.
- Support for voluntary initiatives that improve food quality without restricting consumer choice.

6. What is already working well in your community or sector?

Several voluntary initiatives led or supported by the food industry are delivering public health benefits:

- National Health Star Rating System: Provides accessible nutrition information and is well-recognised by consumers.
- National Healthy Food Partnership: Develops collaborative solutions including nutrient reformulation targets, and industry guidance on portion control and serving sizes.
- Voluntary reformulation: Many companies have significantly reduced sodium, sugar, and saturated fat in products without compromising taste or safety.
- National marketing codes: The Australian Association of National Advertisers (AANA) self-regulatory advertising code limits marketing to children and is regularly reviewed and strengthened.

These initiatives demonstrate the food industry's commitment to achieving shared public health goals through proactive and scalable actions.

7. How can we improve or redesign our current preventive health initiatives?

From the AFGC's view, current initiatives can be improved by:

- Deepening industry engagement from the outset in the policy design process.
- Leveraging existing, effective voluntary programs before pursuing new regulation.
- Promote consistency across state and national strategies to reduce duplication and confusion.
- Modernising dietary guidance to reflect evolving science—focusing on dietary patterns and food matrices, rather than just single nutrients.
- Ensuring that any government intervention is proportionate, evidence-based, and compliant with best practice regulation principles.
- Avoiding negative framing (e.g., "heavily processed foods") and instead promoting balanced dietary patterns that include both fresh and packaged foods. Ongoing collaboration will help ensure initiatives are practical, measurable, and widely supported across sectors.

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8. How can we make sure preventive health initiatives are inclusive and respect cultural values and practices?

- Co-design initiatives with culturally and linguistically diverse (CALD) and Aboriginal and Torres Strait Islander communities.
- Incorporate traditional knowledge and dietary practices into programs and educational materials.
- Ensure health communications are accessible, linguistically appropriate, and culturally relevant.
- Engage trusted community leaders in the development and delivery of programs.

9. What are the best ways to keep you informed about preventive health initiatives?

- Regular updates via digital newsletters and dedicated websites.
- Targeted stakeholder briefings and roundtables for industry and health sectors.
- Transparent reporting on progress against goals and indicators.
- Opportunities to provide feedback through structured consultations.

10-13 – not applicable

14. How can we make sure our strategy adapts to changing health needs and environments over the next 20 years?

From the AFGC's perspective, adaptability in health strategy requires a systems-based approach that embeds continuous improvement, stakeholder input, and data-driven decision-making. Health needs evolve due to factors like demographic shifts, emerging science, global food trends, digital technology, and changing consumer preferences.

To ensure adaptability:

- Regular evaluation and revision cycles (e.g., every 5 years) should be built into the strategy.
- Continuous investment in robust, nationally representative health and nutrition surveys (such as updating the 2011–12 Australian Health Survey) is critical to assess changes in dietary patterns, physical activity, and risk factors.
- Emerging evidence—including research on dietary patterns and food matrix effects—should inform updates to national guidelines and policies.
- Ongoing co-design processes with key stakeholders, including the food industry, should be embedded in the governance model to ensure responsiveness and practical implementation.
- Digital tools and data systems should be used to monitor consumer behaviour and emerging issues in near real-time.

The AFGC also recommends increased investment in horizon scanning to identify future risks and opportunities, enabling proactive policy and program design.

15. How can government play a coordinating role?

Government has a unique role as a convener, standard-setter, and steward of public health. From the AFGC's perspective, effective coordination involves bringing together diverse stakeholders and aligning policy goals across jurisdictions and sectors.

Key actions include:

- Establishing or strengthening multi-sectoral governance mechanisms (e.g., National Preventive Health Taskforces) that include government, industry, health professionals, and civil society.
- Ensuring policy consistency across portfolios, such as health, education, agriculture, food regulation, and industry development, to avoid fragmented or contradictory interventions.
- Facilitating clear and transparent communication to all partners about goals, evidence, roles, and responsibilities.
- Acting as a data integrator and evaluator: supporting shared access to health, nutrition, and consumer data to inform coordinated decision-making and ensure accountability.
- Providing infrastructure and incentives to support collaborative innovation in health promotion, education, and food reformulation.

The AFGC strongly supports government efforts to coordinate shared goals through voluntary mechanisms like the Healthy Food Partnership, where government, industry, and health stakeholders collaborate on reformulation targets, serving size guidance, and public education.

16. What role should public-private partnerships play in preventive health?

Public-private partnerships (PPPs) are essential to delivering scalable, sustainable, and effective preventive health interventions. The AFGC supports well-governed PPPs that harness the strengths of both sectors.

Benefits of PPPs include:

- Leveraging industry innovation and distribution networks to improve access to healthier food options and influence consumer behaviour at scale.
- Enabling co-investment in community health promotion, education campaigns, and reformulation initiatives.
- Supporting collaborative research and development on new products and communication strategies that encourage balanced dietary patterns.
- Enhancing the reach and credibility of voluntary programs like the Health Star Rating system or reformulation targets through shared promotion and transparency.
- Promoting inclusive design of policies and tools that reflect practical feasibility, commercial realities, and consumer preferences.

Successful PPPs require clear governance, shared metrics of success, independent evaluation, and open communication.

When designed appropriately, these partnerships facilitate faster and more cost-effective translation of policy into action than government intervention alone.

17. How can we foster collaboration between government agencies, NGOs, and the private sector to improve preventive health efforts?

To promote effective collaboration across sectors, the AFGC recommends the following strategies:

- Create permanent or semi-permanent advisory forums that include representatives from all sectors, such as the food industry, public health NGOs, Indigenous health groups, and academia.
- Establish shared objectives and indicators for collaborative health goals—such as sodium reduction targets, increased fruit and vegetable intake, or improvements in health literacy.
- Ensure early and ongoing consultation with stakeholders during policy development, rather than at the implementation stage.
- Fund and support joint pilot projects and demonstration programs to assess interventions and identify scalable solutions.
- Promote inter-agency cooperation (e.g., between the Department of Health, Food Standards Australia New Zealand (FSANZ), Department of Education) to align messaging, reduce duplication, and maximise policy coherence.
- Use collaborative data-sharing agreements and digital tools to support evidence-based decision-

The AFGC believes that genuine collaboration occurs when all partners are treated as equal contributors, with clear roles, mutual accountability, and a shared commitment to improving public health outcomes.

18. What changes in laws or regulations are needed to support long-term preventive health initiatives?

From the AFGC's standpoint, it is essential that any regulatory change is evidence-based, proportionate, and developed collaboratively. Often, enhancing voluntary frameworks is more effective than implementing rigid new legislation.

The AFGC recommends:

- Maintaining and expanding voluntary initiatives (e.g., Healthy Food Partnership, HSR system) that have strong governance and public promotion before considering regulation.
- Ensuring any new labelling or promotional restrictions align with the Food Standards Code and developed through FSANZ processes, accompanied by full regulatory impact assessments.
- Providing legislative stability and regulatory certainty to support long-term industry investment in healthier products, consumer education, and reformulation.

19. What funding mechanisms should be put in place to sustain preventive health efforts over the next 20 years?

The AFGC supports a co-investment model where the government leads but collaborates with the private sector and community organisations to deliver preventive health initiatives. Funding mechanisms should reflect the long-term nature of the challenge and provide sustained, flexible support.

Key funding approaches include:

- Establishing a National Preventive Health Fund to support cross-sector partnerships, education campaigns, and reformulation efforts.
- Offering grants for innovation in food reformulation, portion control, digital health education, and behaviour change tools.
- Providing incentives for community-based health promotion, particularly in underserved or culturally diverse communities.
- Allocating resources for regular population-level health and nutrition monitoring, which informs adaptive planning.
- Ensuring funds are available for independent evaluation and quality improvement, to identify effective interventions and make necessary adjustments.

Additionally, the AFGC recommends exploring cost-sharing models with the industry, allowing businesses to provide in-kind support (such as packaging changes, media campaigns, and reformulation research and development) in exchange for recognition and partnership opportunities within public health strategies. –

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