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**Topic:** Law and regulation in public health nutrition

**Title:** Reforming food regulatory systems to protect and promote public health nutrition

**Presentation Type:** Oral

## **Introduction**

Internationally and nationally food regulatory systems are powerful settings for protecting and promoting public health nutrition (PHN). However, the dominant profile and marketing of ultra-processed products highlights failings of current food composition and food labelling policies. This research aimed to review how and why food regulatory systems might be reformed to better protect and promote PHN.

## **Methods**

The three criteria of the Donabedian model for defining and improving quality health services were applied to critically analyse Codex and national food composition and food labelling policy and procedural texts.

## **Results**

Structure: Diminished transparency and lack of opportunities for public health interest participation was observed in how policy agendas are set, policy problems are framed and evidence is interpreted and applied in policy development.

Process: Risk analysis frameworks focus primarily on protecting against microbial and toxicological concerns and less on risks of a dietary pattern nature. Promoting public health opportunities is often confounded by externalising potential health, social and environmental benefits in decision-making.

Outcome: Opportunities are being created for the manufacturers of ultra-processed foods to exploit food standards to create marketing opportunities for their products. Conversely, opportunities to promote the benefits and consumption of nutritious food are being stifled.

## **Conclusion**

Food composition and labelling decision-making in food regulatory agencies often results in policies not consistent with dietary guideline recommendations. Priority reforms include: aligning risk analysis frameworks with dietary guideline recommendations; removing constraints to the promotion of healthy food environments; and supporting transparent and participatory decision making.