

# Benchmarking Food Environments

Progress by the New Zealand Government on implementing recommended food environment policies & prioritised recommendations

## 2020 VS 2023

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## Summary

**The fourth New Zealand Healthy Food Environment Policy Index (Food-EPI) was conducted in May 2023 by an Expert Panel of over 60 independent and government public health and nutrition experts.**

Progress since 2020 was assessed. Some policies were at the level of international best practice, but many large ‘implementation gaps’ were identified, including for healthy food in schools, fiscal policies and marketing restrictions for unhealthy foods. Gaps were identified relating to government infrastructure support for prevention of obesity and diet-related diseases, in particular the lack of government leadership and limited monitoring of progress. Some progress had been made regarding the provision of healthy school lunches (Ka Ora Ka Ako), implementing the recommendations of the review of the Health Star Rating and planning for the next national nutrition survey.

The Expert Panel identified the need to enhance people’s capacity to make healthy food choices with autonomy, and for a comprehensive multi-sector food systems strategy to improve food systems and diets. Five policy actions and five infrastructure support actions were prioritised for immediate action. Many of these actions are similar to those proposed in 2020. The Government is strongly urged to act on the priority actions to improve the diets of New Zealanders, especially for children, and to reduce the burgeoning health care costs of obesity and unhealthy diets.

## Assessing the implementation of government policies and infrastructure support

Healthy diets are essential for wellbeing. Diet-related non-communicable diseases (NCDs) are the biggest preventable cause of death and ill-health in New Zealand. These are related to the food environments in which New Zealanders live.

Government has a critical role to play in creating healthier food environments. Food policies are a powerful tool to increase wellbeing (including mental health) and health equity, including honouring the rights of Māori to the protection of health under Te Tiriti o Waitangi. Existing government policies, such as the Child and Youth Wellbeing Strategy, would more effectively improve children’s nutrition and reduce health inequities by improving the food environments that perpetuate inequities.

This study is an initiative of INFORMAS (International Network for Food and Obesity/non-communicable diseases (NCDs) Research, Monitoring and Action Support) which aims to monitor and benchmark food environments and policies globally to increase the accountability of governments and the food industry for their actions to reduce obesity and NCDs. Food-EPI is a module of INFORMAS which assesses the progress governments have made towards good practice in improving food environments.

Food-EPI consists of two components (policy and infrastructure support) and 13 domains. Forty-seven good practice indicators are evaluated to assess the performance of the Government against international best practice (see Figure 1).

The Food-EPI 2023 was conducted by:

- Compiling evidence of current implementation in New Zealand for policies on food environments and infrastructure support through documenting publicly available information and validating this with government officials.
- Using this evidence, the research team benchmarked policies and actions of the Government against international best practice statements for creating healthier food environments. The level of implementation was categorised as ‘high’, ‘medium’, ‘low’ or ‘very little, if any’.
- Three workshops were held in May 2023 with over 60 participants (the Expert Panel) to identify recommended actions for the NZ Government.
- Fifty experts ranked actions for immediate action via an online ranking survey considering importance and feasibility.

## How well is the New Zealand government performing compared with international best practice?

The New Zealand Government is performing well when compared to international best practice, in preventing unhealthy foods from carrying health claims; providing nutrition information panels on packaged foods; transparency in policy development processes; providing access to information for the public; and monitoring prevalence of NCDs and their risk factors and inequalities (Figure 1).

Progress has been made in some areas:

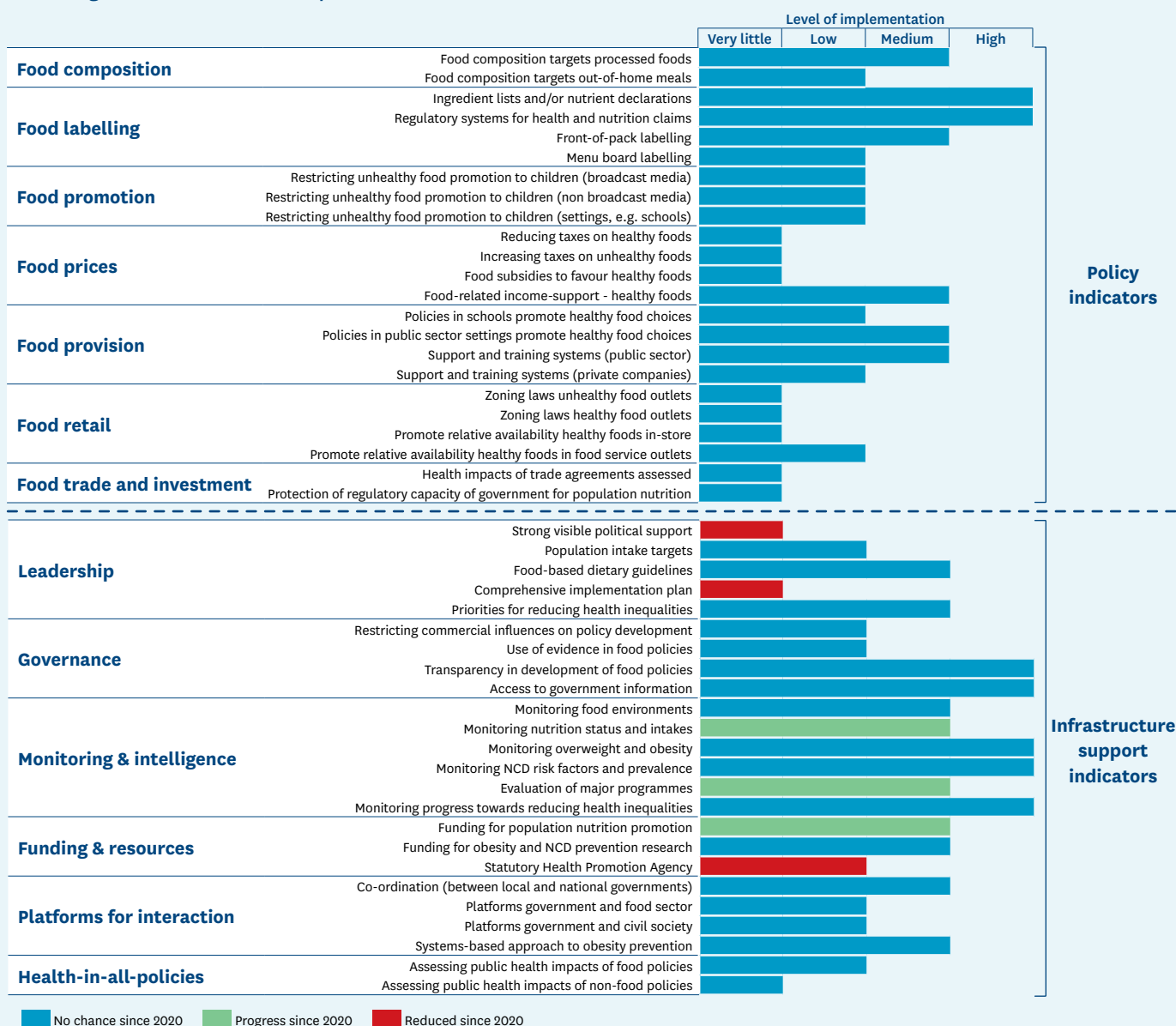
- the expansion of healthy school lunches (Ka Ora Ka Ako) from 120 to approximately 944 schools;
- implementing the recommendations of the 2019 Health Star Rating Review;
- evaluation of major programmes (such as Ka Ora Ka Ako, Healthy Families); and
- current development of methods for the next national nutrition survey (though funding not yet committed for conducting the survey).

However, virtually no progress has been made in most areas since the 2020 Food-EPI assessment, and there are major ‘implementation gaps’ with about 70% of the policy indicators and 40% of the infrastructure support indicators rated as having ‘low’ or ‘very little, if any’ implementation (Figure 1).

Gaps were identified in:

- implementation of restrictions on the marketing of unhealthy food that children are exposed to;
- healthy food policies in schools;
- fiscal policies to redress the imbalance between the cost of healthy versus unhealthy foods and drinks;
- support for communities to limit the density of unhealthy food outlets (for example, around schools); and
- government leadership in the area of obesity and NCD prevention.

Figure 1: Level of implementation of food environment policies and infrastructure support by the New Zealand Government in 2023 against international best practice



## Top priorities for improving the healthiness of food environments

The enabling actions and 10 specific actions recommended by the Expert Panel were prioritised for immediate action to improve the healthiness of New Zealand’s food environments. These are grouped into four areas: Food Systems and Nutrition Strategy; People’s capacity; Infrastructure; Healthier Food Environments (Table 1, Figure 2).

The Expert Panel expressed concern about the extent of food insecurity exposed by the cost-of-living increases, prioritising the policy action of ensuring **households receive an adequate income** to enable autonomy to make healthy food choices.

The Expert Panel was very clear that for any progress to be made, there needs to be **clear leadership from the Public Health Agency**, and the development of a government-led **multi-sectoral National Food Systems and Nutrition Strategy**.

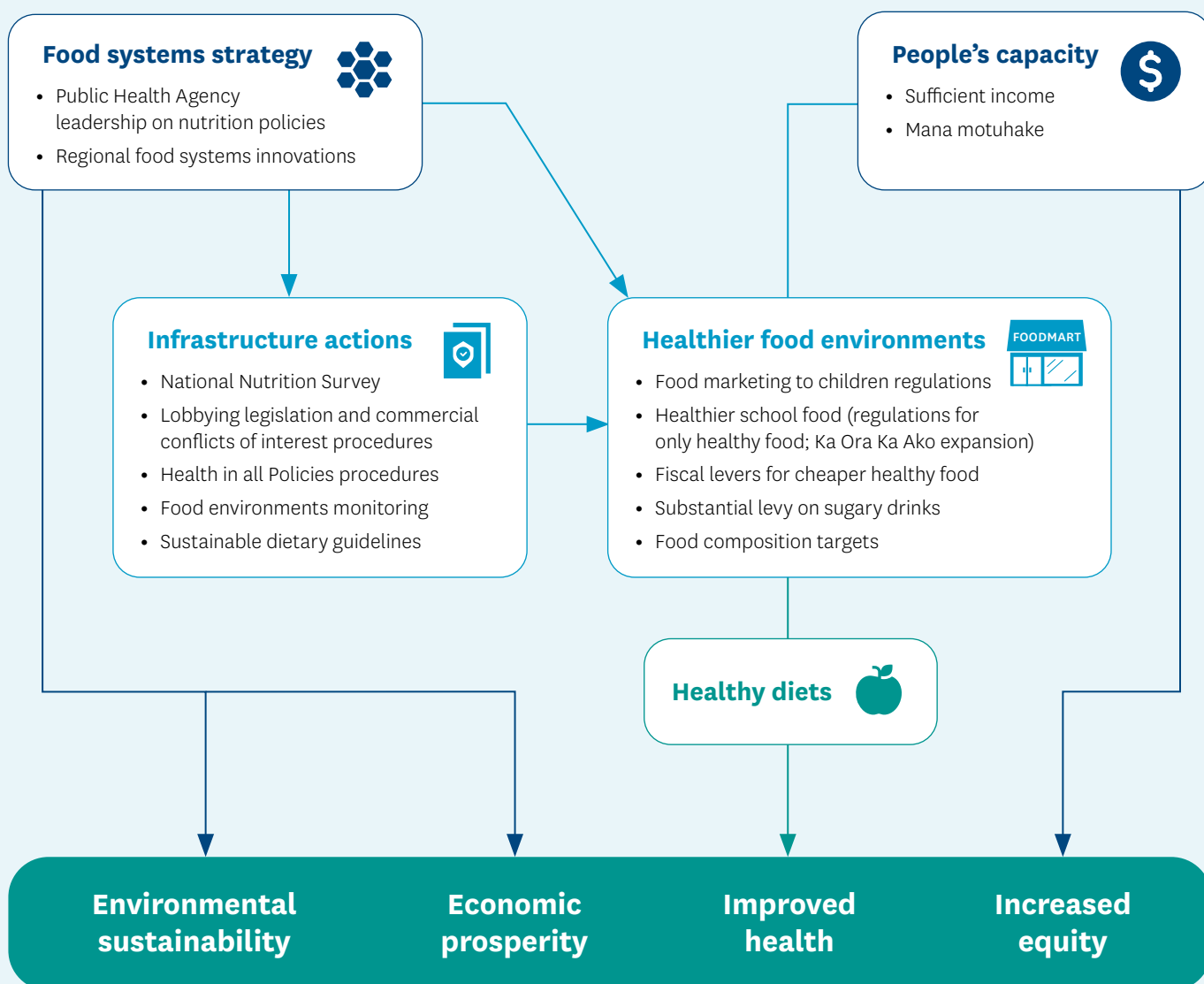
Also of major concern was the need for committed funding for a **national nutrition survey**, with the previous Child and Adult Nutrition Surveys conducted 21 and 15 years ago respectively.

Major policy decisions are being made in the absence of evidence about the current nutrition status, food consumption patterns of the population and food supply.

The Expert Panel calls for a mandatory approach to be adopted in all policy domains, as previous voluntary approaches have proven to be ineffective as they are not enforceable and therefore not implemented or adhered to. In particular, a mandatory approach is needed to protect our children by restricting marketing of unhealthy food to which children are exposed, and ensuring only healthy foods and drinks are provided or sold in schools and early learning services.

These actions would collectively result in positive outcomes for environmental sustainability, economic prosperity, improved health and increased equity. If the New Zealand Government invests in the highly cost-effective policies and programs recommended by WHO we could meet the standard of those countries currently leading the world on food policies for health and wellbeing.

Figure 2: Actions prioritised by the Expert Panel for Government to improve the healthiness of New Zealand food environments



For more information on food environments see Health Coalition Aotearoa and Aotearoa's Food Environment Dashboard

[healthcoalition.org.nz/health-issues/unhealthy-food](https://healthcoalition.org.nz/health-issues/unhealthy-food)  
[foodenvironmentsaotearoa.nz](https://foodenvironmentsaotearoa.nz)

Table 1: Prioritised Actions for the 2023 Food-EPI Evaluation

Enabling Actions	
<p><b>Food systems strategy</b></p> <ul style="list-style-type: none"> <li>• Public Health Agency Leadership</li> <li>• Regional food systems innovations</li> </ul>	<p>The Government develops a long-term, multi-sectoral National Food Systems and Nutrition Strategy with clear outcomes and indicators to improve health, sustainability, food sovereignty, and equity and to uphold Te Tiriti o Waitangi.</p> <p>The Public Health Agency enacts and monitors the implementation of the set of recommended, substantive food policies (below) to improve population nutrition and nutrition equity.</p> <p>The Government invests in innovative, community-led, regionally coordinated, nationally-enabled transformations of food systems to promote health, sustainability, equity and prosperity.</p>
<p><b>People's capacity</b></p> <ul style="list-style-type: none"> <li>• Mana motuhake</li> <li>• Sufficient Income</li> </ul>	<p>The Government creates the policy settings (e.g. for wages, taxes, welfare and housing) to ensure that low income households have sufficient disposable income to afford a healthy diet without relying on grants and food parcels.</p>
Healthier Food Environments Policies	
<p><b>Food marketing to children regulations</b></p>	<p>The Government introduces regulations to restrict unhealthy food and beverage marketing to which children up to 18 years old are exposed through broadcast media, non-broadcast media and in children's settings, using a WHO nutrient profiling model.</p>
<p><b>Healthier school food</b></p> <ul style="list-style-type: none"> <li>• Regulations for only healthy food</li> <li>• Ka Ora, Ka Ako expansion</li> </ul>	<p>The Ministry of Education implements and monitors a mandatory policy for schools and early learning services that ensures foods and drinks provided or sold are healthy and sustainable and that sufficient resources, support and training are allocated for implementation.</p> <p>The Ministry of Education at least doubles the funding and reach of Ka Ora, Ka Ako by 2024.</p>
<p><b>Fiscal levers for cheaper healthy food</b></p>	<p>The Government implement a package of fiscal levers to reduce the absolute and relative cost of healthy food.</p>
<p><b>Substantial levy on sugary drinks</b></p>	<p>The Government introduces a tiered industry levy of at least 20% on sugary drinks and recycles the revenue for targeted food and nutrition support programmes, e.g. Ka Ora, Ka Ako.</p>
<p><b>Food composition targets</b></p>	<p>The Ministries of Health and Primary Industries create mandatory targets/standards for reducing sodium and added sugar in key food categories of processed and ultra-processed foods.</p>
Infrastructure Support Actions	
<p><b>National Nutrition Survey</b></p>	<p>The Government conducts a new national nutrition survey for children and adults to be commissioned in 2024.</p>
<p><b>Lobbying legislation and commercial conflicts of interest procedures</b></p>	<p>The Public Service Commission and Ministry of Justice develop, implement and monitor lobbying legislation and commercial conflicts of interest procedures in line with international best practice guidelines.</p>
<p><b>Health-in-all-Policies procedures</b></p>	<p>The new Pae Ora Health structures actively influence the determinants of health through robust health-in-all-policies procedures.</p>
<p><b>Food environments monitoring</b></p>	<p>The Government regularly monitors food environments with a focus on food marketing, food in schools and food security systems.</p>
<p><b>Sustainable dietary guidelines</b></p>	<p>The Government develops and actively promotes Eating and Activity guidelines which incorporate the full health, social, environmental and cultural dimensions of eating.</p>