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Re: **Australian Dietary Guidelines submission**

To whom it may concern,

Thank you for the opportunity to provide comment on the Draft Australian Dietary Guidelines (ADG) and the Draft Australian Guide to Healthy Eating (AGHE).

The Australian Oilseeds Federation (AOF) is the peak industry body for the Australian vegetable oil industry, with membership spanning the value chain, including seed breeders, farmers, grain handlers, processors and food and feed manufacturers, and exporters. The value of the industry is conservatively valued at \$2.5 billion, with close to half the value represented in direct agricultural produce (canola, sunflower, safflower and soybeans). The role of the Federation is to promote the development, expansion and improvement of Australian oilseed production, and to facilitate linkages throughout the value chain for the common good of the industry.

The AOF has a number of concerns with the draft ADG, which in turn carry over to the AGHE. These can be summarised as:

1. Inconsistencies between ADG and AGHE;
2. Overwhelming focus on fat restriction, with no consideration of loss of fat based nutrients;
3. Lack of consensus between ADG 2012 and the positions advocated by internationally recognised health agencies locally and abroad relating to fats.

#### **1. Inconsistencies between ADG and AGHE;**

The ADG recommends the inclusion of unsaturated fats in place of saturated and trans fats in healthy diets; the AGHE recommends their restriction, by suggesting they be consumed in '...small amounts'. This inconsistency is confusing, to the point of almost being misleading.

The ADG recognises that consumption of SAFA in the Australian diet is higher than recommended, and, recommending that SAFA should be replaced by unsaturated fat. Given that much of the SAFA in the diet is in the form of 'hidden' fat, a blanket recommendation to 'use (fats/oils) in small amounts' is likely

to result in reduction of the visible (and in the main, healthier) fats, while having little/no effect on the invisible/unhealthy fats.

One would have presumed that a recommendation in the ADG to replace SAFA (already higher than recommended) with unsaturated fats and oils would have been translated into corresponding guidance on the AGHE. This is not the case.

The AOF requests that alignment between the ADG and AGHE be a priority, and that it is made clear on the AGHE that SAFA should be replaced with healthier, unsaturated fats.

## **2. Overwhelming focus on fat restriction, with no consideration of loss of fat based nutrients;**

The ADG appear to be espousing a philosophy that dominated nutrition thinking over three decades ago- that “eating fat makes you fat”, and that a key strategy for weight management is reduction in fat intake. Thirty years of population wide consumption of low fat foods is evidence enough that eating less fat will not drive weight loss at a population level. The ADG recognises this, in highlighting the fact that contribution to total energy from fat has decreased over the years (as the carbohydrate contribution has increased). The first paragraph of 3.1.3 demonstrates the apparent outdated philosophical agenda underlying the fat recommendations. In section 3.1.3 titled: *How limiting intakes of foods and drinks containing saturated and trans fat may improve health outcomes*, the opening paragraph relates to weight gain concluding with implication for the metabolic syndrome- surely **the key** health outcome from limiting foods and drinks containing saturated and trans fat is in relation to cardio vascular health.

In addition to the ‘eat less fat’ theme present in the ADG, the AOF is concerned with the dietary implications of a ‘use in small amounts’ recommendation. AOF has supported work that clearly demonstrates the role that vegetable oils and margarines play in providing essential nutrients and achieving a balance of fats consistent with the prevention of coronary heart disease. This is published in a peer-reviewed journal. Our findings in relation to the amount of vegetable oils/margarine that needs to be included in a healthy diet are consistent with the US and Canadian recommendations. Taken together, vegetable oils and margarines contain five essential fat-soluble nutrients – vitamins A, D and E and the two essential (polyunsaturated) fatty acids.

The NHMRC’s own ‘Foundation and Total Diets’ document identified vitamin D deficiency as a problem in Australia- yet in the ADG, makes recommendations to ‘use in small amounts’ one of the major dietary sources of Vitamin D.

The amount of polyunsaturated fat in the Australian diet has been falling for 25 years, due in part to indiscriminating dietary advice in relation to lowering total fat intake. Eating less polyunsaturated fat in the context of a ‘use in small amounts’ recommendation is predicted to INCREASE the risk for coronary heart disease.

The AOF calls for healthy, unsaturated fats to be recognised as an essential part of a healthy diet, and as such, be afforded a specific place **on the plate** within the AGHE, rather than relegated to a side position, to be seen as an ‘option’ rather than a necessity.

## **3. Lack of consensus between ADG 2012 and the positions advocated by internationally recognised health agencies locally and abroad relating to fats.**

The advice in relation to vegetable oils and margarines in the AGHE is contrary to that of the leading authorities on diet and health in Australia – the Heart Foundation and the CSIRO – and is inconsistent with the national food guide for the United States. The Heart Foundation, for example, recommends: *Instead of cutting out all of the fat you eat, try to choose the healthier polyunsaturated and*

*monounsaturated fats and limit the amount of the less healthy saturated and trans fats that you eat.*<sup>1</sup>  
This is in contrast to the DGA, and the AGHE, and will serve to further add to consumer confusion on fats and oils. The Dietary Guidelines for Americans (2010) recommends: *Consume less than 10 percent of calories from saturated fatty acids by replacing them with monounsaturated and polyunsaturated fatty acids.*<sup>2</sup>

The AOF suggests that the NH&MRC review the recommendations, and in particular, wording of the recommendations, to ensure alignment with leading influencers and science-led bodies, such as the Heart Foundation or USDA.

On behalf of AOF members, I thank you for your consideration of the elements raised in this submission, and I look forward to the release of a revised and improved ADG and associated AGHE.

Yours sincerely,



Nick Goddard  
Executive Director,  
Australian Oilseeds Federation.

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<sup>1</sup> <http://www.heartfoundation.org.au/healthy-eating/fats/pages/default.aspx>

<sup>2</sup> <http://www.cnpp.usda.gov/Publications/DietaryGuidelines/2010/PolicyDoc/ExecSumm.pdf>