

Draft Organisational Healthy Food and Drink Policy

Submission to the National District Health Board Food and Drinks Network

Date: 13 April 2016

Contact

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About the New Zealand Nurses Organisation

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand. NZNO represents over 47,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment related matters. NZNO is affiliated to the International Council of Nurses and the New Zealand Council of Trade Unions.

NZNO promotes and advocates for professional excellence in nursing by providing leadership, research and education to inspire and progress the profession of nursing. NZNO represents members on employment and industrial matters and negotiates collective employment agreements.

NZNO embraces te Tiriti o Waitangi and contributes to the improvement of the health status and outcomes of all peoples of Aotearoa New Zealand through influencing health, employment and social policy development enabling quality nursing care provision. NZNO's vision is *Freed to care, Proud to nurse.*

EXECUTIVE SUMMARY

1. The New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on the Draft Organisational Healthy Food and Drink Policy ('the draft policy').
2. Because of the short timeframe, NZNO has restricted consultation with members and staff, but this submission is informed by extensive feedback received during the development of NZNO's position Statement on Obesity.
3. We commend the National District Health Board Food and Drinks Network ('the Network') on the draft policy, which is clear, concise and overdue.
4. The draft policy is a small, but essential, part of changing the environment and dialogue around healthy food.
5. It is, however, somewhat dissociated from other key factors which influence nutrition in health settings, such as food quality, provenance, and delivery, and which are threatened by climate change, antimicrobial resistance, processing and packaging, and staffing. We recommend an integrated approach.
6. In general, NZNO supports the traffic light system outlined, and particularly welcomes the provisions for relative proportions and display, despite the timidity of the ratio of 55% green: 45% amber.

7. We welcome the affirmation of breastfeeding and make some suggestions based on information we have gathered from members working in DHBs.
8. We trust the policy will be extended to all the DHBs' contracted services.
9. NZNO expects that there will be some resistance to the policy and recommends that it be supported by promotional material eg displays, pamphlets etc. in multiple languages.
10. NZNO supports the draft policy.

DISCUSSION

11. The Network will be well aware of the disastrous health and economic consequences of the government's unaccountable abandonment of the innovative and effective *Healthy Eating: Healthy Action Strategy* (HEHA) since 2008, which has set back progress on reducing the epidemics of obesity, diabetes and cardiovascular disease Aotearoa New Zealand is facing.
12. From being a global leader in this field and watching other countries largely adopt our strategy, we are now trailing it, and have almost a decade of inaction to make up for.
13. We thus welcome the draft policy which, though rudimentary, establishes a simple framework and a clear message about food and health in the core public institutions responsible for health.
14. We support the swift implementation of the draft policy, as proposed, from July 1, 2016 as entirely appropriate; there is no rationale for further delay.
15. There is, however, scope for developing the policy within the broader context of global health and environmental challenges that DHBs will, and have already, started to respond to, for instance in seeking to reduce carbon emissions, energy and transport costs, and antibiotic use.
16. Food security, antimicrobial resistance and climate change are all food-related health issues that the World Health Organisation has identified as major challenges to global population health.
17. Ensuring that food is locally grown and supplied is an efficient and cost effective way of limiting risk from all three challenges. It reduces packaging, transport, freezing and heating costs, loss of food quality, the risk of antimicrobial resistance from food imported from countries

where antimicrobial resistance is high (eg China and the US)¹, and the risk of food supplies being disrupted through climate change or other events eg terrorism.

18. NZNO recommends that the draft policy include principles such as a preference for locally grown and supplied food.
19. There is also potential for food policy to include preference for onsite food preparation and cooking. As NZNO has pointed out elsewhere, particularly in relation to HBL's proposals regarding food services and to Southland DHBs decision to outsource its inpatient food supply, this maximises health professionals' ability to respond to dietary needs of their patients, reduces the time wasted in thawing and reheating food, and avoids the need for multiple heating and storing equipment in all wards.
20. In this context, we also note that there is a relationship between food and staffing policy. Food is an integral part of health maintenance and treatment and recovery and sufficient time must be allowed for health workers to attend to the dietary needs of patients and/or residents. That critically depends on staffing numbers and skill mix, and the ready availability of appropriate food choices.
21. Accordingly, NZNO also recommends that the draft policy be extended to all DHB contracted services and facilities.

SECTION 3 Healthy food principles

22. NZNO supports the principles of having a variety of foods, that are minimally processed and drinks that are predominantly water and unflavoured milk in retail outlets in DHB facilities. While rudimentary, and likely to be contentious, they have the value of simplicity. The closer the food is to its original state, the less grounds for contention there will be.

SECTION 4.4 Breastfeeding in the workplace

23. With regard to s4.4, which we strongly support, anecdotal data gathered from our members last year indicates that while most DHBs do provide facilities for breastfeeding and storage for patients and visitors, they do not generally extend the same to staff. Staff are usually expected to use the maternity facilities which is not appropriate

¹ Although it is a global problem, the rates of antimicrobial (including antibiotic) resistance among important bacterial pathogens are relatively low in New Zealand compared with many other countries. Deborah A Williamson, Helen Heffernan. The changing landscape of antimicrobial resistance in New Zealand. Review article *NZMJ* 26th September 2014, Volume 127 Number 1403

or consistent with the requirements and intention of s69Y of the Employment Relations Act 2000.

24. Nor, despite the large number of women many DHBs employ, is there consistent support for ensuring the availability and affordability of support onsite child care facilities, a significant way of supporting breastfeeding.
25. We have appended our data which we hope will be of interest, though please note, it is preliminary and anecdotal.
26. We suggest addressing both issues – as Auckland DHB appears to have done – would lend substance to the claim that “Breastfeeding is supported in all organisation settings as the optimum nutrient for infants”.

Section 5 Healthy Food and Drinks Environment Criteria

27. In general, NZNO supports the traffic light system outlined, and particularly welcomes the provisions for relative proportions and display.
28. There is a range of Nutrient Profiling Systems. The World Health Organisation uses a model which appears quite complex, and though it would likely provide a stringent framework for industry it may not provide much in the way of predictability or understanding for the consumer.
29. A traffic light system has been found to increase consumer’s awareness of healthy food choices at point of purchase (Sonnenberg et al., 2013) and has growing support, particularly where it is perceived that it comes from a recognised authority (Hawley et al., 2011).
30. We suggest that the ratio of 55% green: 45% amber is very conservative.
31. We leave comments on the categorisation of specific foods to those expert in the field.
32. Once again we congratulate the Network for taking action on this pressing public health issue and we look forward to the draft policy's speedy implementation.
33. We recommend that it is supported by appropriate promotional information and material, appropriate to all ages and circumstances and that is available in multiple languages.

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REFERENCES

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Sonnenberg,L., Gelsomin, E., Levy, D., Riis, J., Barraclough,S., & Thorndike, A. (2013). A traffic light food labelling intervention increases consumer awareness of healthy and healthy choices at the point of purchase. *Preventative Medicine* 57, 253-257.
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APPENDIX 1 Preliminary anecdotal data re breastfeeding and crèche facilities for NZNO members employed in DHBs

District Health Board	Breastfeeding/ Expressing facilities for Employees	Creche facilities /day care for Employees
Auckland	Yes rooms for rooms. V. Good link with B/F CONSULTANT, equipment	Onsite and subsidised cos DHB subsidises the placement – v. significant.
Bay of Plenty	BOPDHB do not provide staff only b/f facilities – but public ones are open for staff. They <i>plan</i> to put in a fridge to store milk. They <i>are planning</i> to locate rooms conveniently for staff.	There are a number of private crèches that are nearby the Hospitals in TGA & Whk. None are subsidised
Capital and Coast	Do not provide staff facilities for B./F . there is a breastfeeding room in the atrium which is open to the public and the ability to store pumped breast milk in the milk fridge on the maternity ward. There's no easily accessible room for staff to pump. They have to go to the maternity ward to store their milk as its not allowed to be stored in our other fridges because it is a body fluid.	Private "South Side Kids" Crèche is not onsite, just closer to the hosp than many other crèches. Not sure of any subsidies.
Counties Manukau	Counties Manukau don't have specific rooms but there are quiet areas that are allocated for use and readily available.	No information
Hawkes Bay	No. Some staff come to Ata Rangi if they wish to use one of our pumps but there is not always a room available if they	No information

	require complete privacy.	
Hutt Valley	HVDHB has a room that staff members can breastfeed /express. I think they can get access to it afterhours via the orderlies. In the Maternity Ward, staff feed/express on the ward (ie not a staff facility)	HVDHB has no crèche or day care facility.
Lakes District	Lakes has a policy: Breastfeeding and Expressing Milk in the Workplace Policy for Lakes District Health Board Employees.	No information
Mid Central	We have a dedicated breast feeding room in maternity for use by inpatients, staff and / or visitors. We also offer twice weekly education sessions for anyone interested in breast feeding to attend.	None
Northland	No facilities for staff only Breast feeding and expressing but they can use in NDHB maternity ward 11. If necessary they are lent equipment to express They express and take milk with them to their work area which may have a fridge in some area's in own staff tea room. The maternity ward is moving to a new building next month and there is not fridge in the breastfeeding room in the new maternity unit.	NDHB does not have any crèche facilities. It has been discussed over the years and has never come to fruition. Historically they did have one that was off site 30 years ago and was subsidised by the DHB.
Tairāwhiti	No B/F facilities for staff only at Tairāwhiti	There is a Crèche across the carpark
Taranaki	Yes in several areas (but not sure if they are for staff only or open to the	No information

	<p>public) TDHB Antenatal Clinic, Base Hospital TDHB Mental Health Outpatients, Base Hospital TDHB Mothers' Quiet Room, Ward 15, Base Hospital TDHB Parenting Room, Main Corridor near Outpatients TDHB Postnatal Lounge, Ward 15, Postnatal Hospital TDHB Preadmission Clinic/ENT Clinic, Base Hospital http://www.tdhb.org.nz/services/maternity/breast_feeding.shtml</p>	
Waikato	Waikato DHB has one facility on its main campus.	Waikato have a childcare centre on site, run by Lollipops educate
Wairarapa	Masterton Hospital does have a 'room' available for women to breast feed their babies. They have been declared a breast friendly hospital by their maternity unit/midwifery team who has audited them	No information
Waitemata	Yes There are rooms provided in paediatric units and SCBU/NICU and equipment provided for mums to express and store their EBM. But these are <i>not separate</i> for staff.	WDHB also have as staff crèche on site (privately owned so not DHB service as such)
Whanganui	Whanganui DHB does not provide a specific space (or spaces) in the hospital for staff to express milk, but staff working in SCBU/ED are able to borrow equipment and find a space (and that might be replicated in other wards).	None
Canterbury	CDHB People and Capability (HR) at Christchurch Hospital confirmed they don't have any dedicated	CDHB does not operate childcare facilities for children of staff. The DHB

	<p>breastfeeding facilities for staff. Its unclear whether there will be facilities in the new Acute Services Building on the Christchurch Campus.</p> <p>There are public and inpatient facilities for breastfeeding and expressing at Chch Womens and other maternity facilities.</p>	has negotiated discounted rates for staff with some childcare providers including the ABC chain.
Nelson-Marlborough	<p>We are currently in the process of updating our Breastfeeding in the Workplace Policy. As part of that we have done a recent update of the breastfeeding facilities available for staff. This is the current information:</p> <p>Nelson Hospital, Staff breastfeeding room located in the Medical Unit</p> <p>Wairau Hospital Staff breastfeeding room / Breastfeeding Clinic – Key available at maternity unit. Fridge is available in maternity unit for breast milk storage.</p> <p>Motueka Community Hospital Staff room. Fridge is available for breast milk storage.</p> <p>Golden Bay Community Hospital Whanau Room. Fridge is available in the staff room for breast milk storage.</p> <p>Murchison Community Hospital Staff room. Fridge is available for breast milk storage</p>	We do not have any crèches
South Canterbury	NO INFO	NO INFO
Southern District	<p>The SDHB provides a room in both the Dunedin and Southland Hospital for staff to breast feeding.</p>	<p>In Dunedin there is a crèche on the grounds and is now for staff only. However it closes at 5 pm and not suitable for parents working pm shift. There are no subsidies for staff to use the crèche.</p>

West Coast District	No information	No information
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