



Australia's Foodborne Illness Reduction Strategy 2018-2021+

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The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 6000 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for food and nutrition for healthier people and healthier nations. DAA appreciates the opportunity to provide feedback on Australia's Foodborne Illness Reduction Strategy 2018-2021+ by the Food Regulation Standing Committee.

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DAA interest in this consultation

DAA is the peak professional body for dietitians in Australia and responsible for the Accredited Practising Dietitian (APD) program as the basis for self-regulation of the profession.

DAA advocates for a safe and nutritious food supply in which the community has confidence and which meets the nutritional needs of all Australians, including groups with special needs.

As experts in nutrition, APDs assist the general population and groups with special dietary needs to meet their nutritional needs. APDs also assist with the translation of food labels and nutrition content claims.

Summary

DAA supports Australia's Foodborne Illness Reduction Strategy 2018-2021+, however recommends that the review of the Foodborne Illness Reduction Strategy should also take into account the global and national approaches for the prudent use of antimicrobials to reduce the risk of anti-microbial resistance (AMR).

Discussion

DAA supports the targeted approach of the Foodborne Illness Reduction Strategy, however in regards to the proposed mid to long-term national actions, DAA recommends the important goal of reducing food borne illness must be met without increasing the risk of anti-microbial resistance (AMR).

The World Health Organisation (WHO) has strongly warned about the growing problem of AMR.¹ WHO has identified AMR as a key issue in treating many otherwise fatal human infections including tuberculosis, staphylococcal bacteraemia, gonococcal infections, and multi-drug resistant *Escherichia coli*.² This critical health concern is repeated in the Australian Government's National Antimicrobial Resistance Strategy 2015-2019.³

Recent Food and Agriculture Organisation guidelines have focused on growing evidence of the risk of AMR due to misuse of antimicrobial drugs in agriculture.⁴ In 2017, WHO issued Guidelines on the Use of Medically Important Antimicrobials in Food Producing Animals.⁵ Australia has traditionally adopted a more conservative and prudent approach to the use of these drugs in food production.⁶ DAA supports the approach of the Australian Pesticides and Veterinary Medicines Authority that the potential extensive health risks from AMR mean there is no room for complacency about AMR.

Overall, DAA supports Australia's Foodborne Illness Reduction Strategy 2018-2021+ including the proposed review of the Food Safety Standards for egg and poultry meat primary production. DAA, however, is also mindful of the risks of AMR and the recognition of these risks at a global and national level, as outlined above. DAA considers that the Foodborne Illness Strategy 2018-2021+ should also expressly acknowledge that the review of these standards will take into account the global and national approaches for the prudent use of antimicrobials to reduce the risk of AMR.

References

1. World Health Organization (WHO). Global Strategy for Containment of Antimicrobial Resistance. Switzerland: WHO; 2001. (Available from: http://apps.who.int/iris/bitstream/handle/10665/66860/WHO_CDS_CSR_DRS_2001.2.pdf?sequence=1).
2. World Health Organization (WHO). Global Action Plan on Antimicrobial Resistance. Geneva: WHO; 2015. (Available from: http://apps.who.int/iris/bitstream/handle/10665/193736/9789241509763_eng.pdf?sequence=1)
3. Department of Health/Department of Agriculture. Responding to the threat of antimicrobial resistance – Australia's first antimicrobial resistance strategy 2015-2019. Australian Government; 2015. (Available from: <https://www.amr.gov.au/resources/national-amr-strategy>).
4. Food and Agriculture Organization of the United Nations (FAO). The FAO Action Plan on Antimicrobial Resistance 2016-2020. Rome: FAO; 2016. (Available from: <http://www.fao.org/3/a-i5996e.pdf>).
5. World Health Organization (WHO). WHO Guidelines on Use of Medically Important Antimicrobials In Food-Producing Animals. Geneva: WHO; 2017. (Available from: http://www.who.int/foodsafety/publications/cia_guidelines/en/).
6. Australian Pesticides and Veterinary Medicines Authority. (2017) Antibiotic Resistance in Animals. Australian Government; 2017. (Available from: https://apvma.gov.au/sites/default/files/publication/27326-final_amr_report_for_publishing_v02_140817_a939399.pdf).