bringing food back
to healthcare

11th August 2021

Committee Secretary
Rural and Regional Affairs and Transport Legislation Committee
Department of the Senate
PO Box 6100
Parliament House
CANBERRA ACT 2600
AUSTRALIA

Dear Committee Members,

We are grateful for the opportunity to provide input to the Rural and Regional Affairs and Transport Legislation Committee Senate Inquiry into the definitions of meat and other animal products.

Doctors For Nutrition is an independent registered Australian health promotion charity led by medical and dietetic professionals. Our vision is a society and healthcare system that embraces evidence-based whole food nutrition solutions to help people optimise their health and quality of life.

1b. The health implications of consuming heavily manufactured protein products which are currently being retailed with red meat descriptors or livestock images, including:
i. consideration of unnatural additives used in the manufacturing process; and
ii. consideration of chemicals used in the production of these manufactured protein products.

We concur that the labelling on all products, animal or plant-based, must be transparent and accurate, allowing consumers the ability to make informed choices.

We strongly believe that it is remiss of the Senate Inquiry to only be exploring

the potential health implications of consuming plant-based alternatives when there is a large, existing body of evidence on the individual health impacts of consuming animal meat – particularly the consumption of red and processed meats.

Strong evidence from large prospective cohort studies and multiple meta-analyses has consistently demonstrated a positive dose-response relationship with high consumption of red meat, particularly processed red meat, with increased incidence and mortality from non-communicable diseases, including cancers[i] [ii] such as colorectal cancer[iii] [iv] [v], cardiovascular disease[vi] [vii] [viii] and type 2 diabetes mellitus[ix] [x] [xi].

The evidence was found to be so indisputable that the 2013 Australian Dietary Guidelines recommend Australians to limit consumption of red meat (defined as beef, lamb, goat, pork) to 65g per day (or 23.66kg per year) to "reduce some of the health risks associated with consuming meat" (p52, NHMRC).[xii]

Australians consume red meat (a total of 44.4kg/year) at nearly double the recommended amount, and almost double the global average.[xiii]

Doctors For Nutrition strongly maintains that the objective for any review of health implications of consuming protein products must be considerate of health overall, regardless of source. The narrow scope of the current Senate Inquiry is cause for concern. It would be unacceptable for labelling of plant-based alternatives to be impacted while no changes are enforced to provide consumers more information on the health impacts of animal-based proteins.

Outside of the scope of this Senate Inquiry, although inextricably tied to this matter, are the other urgent crises Australian's animal heavy diets are contributing to, namely:

- Climate change and environmental degradation
- Pandemic risk and antimicrobial resistance

There is an urgent imperative in high-income countries like Australia to move populations towards consuming largely plant-based diets. Any actions to halt this should be carefully and thoroughly considered from all angles.

Kind regards,

Doctors For Nutrition
Registered Charity ABN 97626980345
www.doctorsfornutrition.org
contact@doctorsfornutrition.org

[i] Pan A, Sun Q, Bernstein AM, Schulze MB, Manson JE, Stampfer MJ, et al. Red meat consumption and mortality. Arch Intern Med [Internet]. 2012 [cited 2020 Jun 23];172(7):555–63. Available from: https://jamanetwork.com/journals/jamainternalmedicine/fullarticle/1134845 doi: 10.1001/archinternmed.2011.2287

[ii] Etemadi A, Sinha R, Ward MH, Graubard BI, Inoue-Choi M, Dawsey SM, et al. Mortality from different causes associated with meat, heme iron, nitrates, and nitrites in the NIH-AARP Diet and health study: Population-based cohort study. BMJ [Internet]. 2017 [cited 2020 Jun 23];357:j1957. Available from: https://www.bmj.com/content/357/bmj.j1957 doi: 10.1136/bmj.j1957

[iii] International Agency for Research on Cancer (IARC) (FR). IARC Monographs evaluate consumption of red meat and processed meat [Internet]. Lyon: WHO; 2015 Oct 26 [cited 2020 Jun 23]. Available from: https://www.iarc.fr/wp-content/uploads/2018/07/pr240_E.pdf

[iv] English DR, MacInnis RJ, Hodge AM, Hopper JL, Haydon AM, Giles GG. Red meat, chicken, and fish consumption and risk of colorectal cancer. Cancer Epidemiol Biomarkers Prev [Internet]. 2004 [cited 2020 Jun 23];13(9):1509-14. Available from: https://cebp.aacrjournals.org/content/13/9/1509.long

[v] Larsson SC, Rafter J, Holmberg L, Bergkvist L, Wolk A. Red meat consumption and risk of cancers of the proximal colon, distal colon and rectum: The Swedish Mammography Cohort. Int J Cancer [Internet]. 2005 [cited 2020 Jun 23];113(5):829-34. Available from: https://onlinelibrary.wiley.com/doi/full/10.1002/ijc.20658 doi: 10.1002/ijc.20658

[vi] Wang X, Lin X, Ouyang YY, Liu J, Zhao G, Pan A, et al. Red and processed meat consumption and mortality: Dose-response meta-analysis of prospective cohort studies. Public Health Nutr [Internet]. 2015 [cited 2020 Jun 23];19(5):893-905. Available from: https://pubmed.ncbi.nlm.nih.gov/26143683/ doi: 10.1017/S1368980015002062

[vii] Micha R, Wallace SK, Mozaffarian D. Red and processed meat consumption and risk of incident coronary heart disease, stroke, and diabetes mellitus: A systematic review and meta-analysis. Circulation [Internet]. 2010 [cited 2020 Jun 23];121(21):2271-83. Available from: https://pubmed.ncbi.nlm.nih.gov/20479151/ doi: 10.1161/CIRCULATIONAHA.109.924977

[viii] Bernstein AM, Sun Q, Hu FB, Stampfer MJ, Manson JE, Willett WC. Major dietary protein sources and risk of coronary heart disease in women. Circulation [Internet]. 2010 [cited 2020 Jun 23];122(9):876-83. Available from: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2946797/ doi: 10.1161/CIRCULATIONAHA.109.915165

[ix] Barnard N, Levin S, Trapp C. Meat consumption as a risk factor for type 2 diabetes. Nutrients [Internet]. 2014 [cited 2020 Jun 23];6(2):897–910. Available from: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3942738/ doi: 10.3390/nu6020897

[x] Pan A, Sun Q, Bernstein AM, Schulze MB, Manson JE, Willett WC, et al. Red meat consumption and risk of type 2 diabetes: 3 cohorts of US adults
and an updated meta-analysis. Am J Clin Nutr [Internet]. 2011 [cited 2020 Jun 23];94(4):1088-96. Available from: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3173026/ doi: 10.3945/ajcn.111.018978

[xi] Bylsma L, Miller P, Alexander D. A review and meta-analysis of prospective studies of red and processed meat, meat cooking methods, heme iron, heterocyclic amines and prostate cancer. Nutr J [Internet]. 2015 [cited 2020 Jun 29] Available from: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4687294/ doi: 10.1186/s12937-015-0111-3

[xii] NHMRC. Australian dietary guidelines [Internet]. Canberra: NHMRC; 2013. Available from: https://www.eatforhealth.gov.au/guidelines

[xiii] OECD (2021), Meat consumption (indicator). doi: 10.1787/fa290fd0-en (Accessed on 02 August 2021)