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**AHPA NSW/ACT Branch
submission on the
ACT Preventive Health Action Plan
2023–2025
Consultation Draft (March 2023)**

11 August 2023



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INTRODUCTION

The Australian Health Promotion Association Ltd (AHPA®) is the peak body for health promotion in Australia. AHPA advocates for the development of healthy living, working and recreational environments for all people. Through our work we support the participation of communities and groups in decisions that affect their health.

Australia is one of the healthiest countries in the world. This is largely because of effective public health and its core services – protection, prevention and health promotion which includes action to create and support the social and environmental conditions that enable Australians to enjoy a healthy and happy life. We are now more aware than ever of just how complex the circumstances are by which human health is influenced – policies and actions shaped by the unfair distribution of wealth, power and resources, both locally and internationally. We are also more cognisant of the range of skills and practices required to enhance individual and community capacity and act to address those forces that lead to health inequities - the unfair and avoidable differences in health status seen within and between countries. **Health promotion's role has never been so significant.**

ABOUT US

Incorporated in 1990, AHPA is the only professional association specifically for people interested or involved in the practice, policy, research and study of health promotion. Our member-driven national Association represents over 1000 members and subscribers and is governed by a Board at the national level with operational branches representing all states and territories. Membership of AHPA is diverse, and includes designated health promotion practitioners, researchers and students, as well as others involved in promoting physical, mental, social, cultural and environmental health, whose primary profession or area of study may be something different, but whose responsibilities include promoting health. Members represent a broad range of sectors including health, education, welfare, environment, transport, law enforcement, town planning, housing, and politics. They are drawn from government departments and agencies, universities, non-government organisations, community-based organisations and groups, private companies, and students.

Our activities include: national registration of health promotion practitioners for the International Union for Health Promotion and Education (IUHPE) in Australia; national health promotion university learning and teaching network; early career support; national and local conferences and events; a tri-yearly Population Health Congress (with partners: Public Health Association of Australia, Australasian Epidemiological

Association and Australasian Faculty of Public Health Medicine); a website providing professional and membership information; a national listserv providing members with sector news, employment, advocacy and events information; stakeholder and member communication across a range of platforms; advocacy action; strong partnership working with a range of organisations; awards; traineeships; mentoring; scholarships and bursaries; and the Health Promotion Journal of Australia.

Our Vision

A healthy, equitable Australia.

Our Purpose

Leadership, advocacy and workforce development for health promotion practice, research, evaluation and policy.

Our Principles

- Ethical practice - Supporting culturally informed, participatory, respectful, and safe practice.
- Health equity - Addressing the sociocultural, economic, political, commercial and ecological determinants of health in order to build health equity.
- Innovative and evidence informed approaches - Promoting and supporting evidence informed research, policy and practice.
- Collaboration - Working in partnership with other organisations to improve health and wellbeing.



RESPONSE TO THE ACT DRAFT ACTION PLAN

AHPA strongly supports the principles of equity, life course, and the overall intent and purpose articulated in the ACT Draft Preventive Action Plan 2023-2025.

Increasing socio-economic inequality is well-documented, affecting populations and large numbers of communities within and between countries (1,2,3). And given the social, environmental, political, and commercial determinants of health that can widen the inequality gaps and undermine health gains, the overall prevention vision for all Australians must have at its core a vision for a just and equal world, a necessary condition to promote health in populations (4,5). Truly effective preventive action plan should aim to address inequities. We therefore argue for an extension to the guiding principles of the second action plans for an explicit statement on improving social and economic justice in Australian society.

Our submission does not go into the detail of evaluating the merits of the ACT Health's choice of priority areas. We do make the observation, however, that health promotion and preventive health action spans a much broader spectrum of activities and issues. We would encourage the ACT Health to broaden its priority areas together with an increase in funding for health promotion and preventive health action. At a minimum the ACT government should be contributing 5% of its health budget towards these areas in line with the recommendations of the National Preventive Health Strategy 2021-2030.

Enhancing the Health Promotion and Prevention Workforce

Investment in a skilled and competent health promotion and prevention workforce is vital. The focus on infrastructure and a skilled workforce for health promotion and prevention has the potential to accelerate and sustain prevention action. However, the Draft Action Plan is silent on this matter. It will be important to see investment in the health promotion and prevention workforce within the Draft Preventive Action Plan.

AHPA therefore urges ACT Health, in the final Preventive Action Plan 2023-2025, make explicit and specific commitment to future investments in the health promotion workforce in order to achieve the quality of planning, delivery, evaluation and continuous learning and improvement necessary to realise the desired prevention outcomes.

Health is influenced by commercial forces

AHPA is encouraged to see focused actions to minimise and prevent e-cigarette use in adolescents, young adults and higher risk groups including Aboriginal and Torres Strait Islander peoples. However, a comprehensive preventive approach to tackling the public health crises of e-cigarette use (and other commercially-driven practices such as gambling, and alcohol drinking) among young people should also comprise strategies to counter the negative influence of Big Industries' commercial interests (6,7).

The power that corporations have over our environment, culture and desirability of products is considerable (6). Global Health Professor Ilona Kickbusch describes the commercial determinants of health as “strategies and approaches used by the private sector to promote products and choices that are detrimental to health”; marketing is one channel to achieve this (6). Extensive evidence shows the negative impacts on child and adolescent health by marketing unhealthy products and services (8).

The World Health Organization suggests that the commercial determinants affect everyone, but young people are especially at risk, and unhealthy commodities worsen pre-existing economic, social and racial inequities (9). Addressing these can prevent illness, and promote societal equity (9).

Public health colleagues Thomas, Pitt and Daube have suggested that if we apply the principle of ‘logic based on parallel evidence’ (as cited in McKinsey Global Institute. Overcoming obesity: An initial economic analysis, 2014), to significantly reduce young people’s exposure to advertising by industries that are harmful to health we must apply the comprehensive approach used in other public health initiatives (such as tobacco control), using restrictions on advertising, promotion and sponsorship to significantly reduce harms (10).

In the case of regulatory reform to digital platforms, the evidence is clear:

- Corporations are marketing to children (11-13).
- Digital marketing for alcohol, unhealthy food and gambling reaches children at a very young age, affecting their attitudes, habits, consumption and health (12). There are currently limited protections in Australia to restrict these predatory marketing tactics (13).
- Consumers, including children, are spending more time online, as noted in the consultation paper.
- Current consumer law is insufficient for protecting people from digital platform harms, as noted in the consultation paper, and mandatory codes of self-regulation of harmful industries is proven to fail.

- There is public support for measures to reduce the current amount of online marketing of unhealthy products (13).

We can prevent harm from commercial marketing on digital platforms:

- Current consumer law is insufficient for protecting people from digital platform harms.
- A regulatory framework with a legislative basis is needed to govern digital platform marketing systems.
- Targeted measures must protect people from harmful digital marketing practices.
- Creating transparency in digital platform marketing can help hold companies accountable to their marketing practices.

AHPA notes that multiple examples of voluntary codes of conduct/practice have shown to be insufficient in achieving widespread change, and supports the implementation of comprehensive, mandatory regulation to protect people from harmful digital marketing practices, including protections for children and others most at risk of harm from digital marketing of harmful and addictive products like alcohol, gambling, and tobacco (and e-cigarettes).

AHPA strongly suggests the final Action Plan invest in increased and tighter restrictions on advertising of harmful industries (alcohol, gambling, e-cigarettes) across all forms of media and digital platforms considering the rapidly changing landscape of corporations and accelerating technological advancements. Public and school education is necessary but not sufficient to combat pervasive advertising and norms and the impacts of the commercial and social determinants of health. Individuals alone cannot make informed or 'healthy' choices, nor take personal responsibility for their health in environments that inherently bad for health.



SUMMARY OF RECOMMENDATIONS

1. Extend the guiding principles of the Action Plan to include an explicit statement on improving social and economic justice in Australian society.
2. Increase preventive health budget to 5% of total health budget in line with national recommendations.
3. Include a specific statement committing to future investments in the ACT health promotion workforce.
4. Invest in increased and tighter restrictions on advertising of harmful industries (alcohol, gambling, e-cigarettes) across all forms of media and digital platforms, and especially as they relate to government owned or managed platforms, services, and products.

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