

#68

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Page 2: About you

Q1 Other (Please specify):
 Do you work in... NGO

Q2 **No**
 Did you provide feedback to the ACI back in 2021, about the strengths and weaknesses of the original (2011 and 2013) standards

Q3 **No**
 Are you a member of the ACI Nutrition Network

Q4 **Consolidated feedback on behalf of your work group / organisation**
 Is your response today

Page 3: An online resource

Q5 **I don't have a comment on this**
 The revised Standards have been designed to be an online resource. This is a change from the original Standards, which are laid out as hard copy documents, available online as PDFs.

Page 4: Consolidated from three to one

Q6

The original Standards were three separate documents: one for adult inpatients, one for paediatric inpatients and one for consumers of inpatient mental health services. The revised Standards are consolidated into one resource, with sections as appropriate.

I have a minor issue with this change (please explain below)

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Comments:
There seems to be a lot of repetition in the document. I may have got this impression because I searched for all occurrences of the words 'vegan' and 'vegetarian' and found many of the occurrences were similar. This may not be a problem for people who are using the document operationally.

Page 5: Food preferences and culture

Q7

The revised Standards include statements under 'menu planning and design' about offering plant-based / vegetarian choices and considering the cultural diversity of the inpatient population.

I really like this change, it's great (please explain why below)

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Comments:
Here at Vegan Australia, we often hear of complaints about the lack of vegan options in a number of contexts, including health facilities. We support the rights of vegans to receive meals consistent with their beliefs. These rights are protected by international law as can be seen here: <https://www.vegansociety.com/get-involved/international-rights-network/what-rights-do-vegans-have>

Page 6: Comfort foods

Q8

The revised Standards include statements to support inclusion of certain 'comfort foods' on menus – options that may be more appealing to inpatients during a hospital stay.

This change is fine

Page 7: Salt

Q9

The revised Standards have maintained the upper limit for sodium at 2300mg/day for adults and mental health consumers. However they contain some new discussion around how to include higher sodium options on a menu and providing salt sachets to inpatients who request added salt for their

I don't have a comment on this

Page 8: Fats

Q10

I don't have a comment on this

The revised Standards have increased the upper limit for saturated and trans fats from 10% of energy to 13% for adults and 11% for mental health consumers.

Page 9: Fortification

Q11

I have a minor issue with this change (please explain below)

The revised Standards now make a general reference to fortification of foods as an overarching principle, and specific reference to fortification with energy, protein, calcium and vitamin D.

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Comments:
Fortification with vitamin B12 should be included in plant-based milks and other vegan foods.

Page 10: Specific nutrients

Q12

I have a minor issue with this change (please explain below)

In the nutrient goals, the revised Standards now have nutrient guidance statements about carbohydrates, vitamin D for adults and mental health inpatients, and vitamin B12 for paediatric inpatients.

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Comments:
There should be guidance on vitamin B12 for vegans. We support the statement "It's recommended that vegans take a B12 supplement" from the Dietitians Australia page linked to from the draft Nutrition Standards (<https://dietitiansaustralia.org.au/health-advice/vegetarian-diet>).

Page 11: Paediatrics

Q13

I don't have a comment on this

In the revised Standards, paediatric considerations around age-appropriate textures and serving sizes have been specifically discussed. The age groups in the menu choices have also been revised, now <1 year, 1-8 years and 9-18 years.

Page 12: Mental health facilities

Q14

I don't have a comment on this

The revised document provides some additional menu design Standards for mental health facilities, including special meal events (e.g. BBQs and cooking classes) and midmeals.

Page 13: Banding

Q15

I don't have a comment on this

The section on banding has been revised. This includes new introductory explanations to clarify what the bands are and their purpose in menu design. The bands themselves have also been reviewed and updated, including for pre-packaged foods.

Page 14: Test menus

Q16

I have a minor issue with this change (please explain below)

The original Standards contained 'test menus'. These have been updated in the revised Standards, and also repositioned under the heading of 'Standards Validation' with new explanatory introduction about what test menus are for and how they are used.

Comments:
There should be demonstration meal selections for vegan diets. Vitamin B12 should be included in the nutrient analysis.

Page 15: Use in audit tools

Q17

I don't have a comment on this

In the revised document, the nutrient goal Standards and menu choice Standards have been worded to allow easy use as 'yes'/'no' compliance criteria in an audit tool.

Page 16: Any other comments?

Q18

Are there any other improvements or strengths of the revised Standards that you haven't mentioned yet?

We note that the revised Standards contains the statement "Future goal is to move towards a minimum of 1 vegetarian main meal option per day as part of the main meal options." Vegan Australia would like this to be implemented as soon as possible, preferably in the current revision. We also recommend that the word "vegetarian" be replaced with "vegan".

We appreciate that the revised Standards recommend that soy milk non dairy milk alternatives be available. This should be extended to cover all vegan dairy alternatives, including cheese and yogurt.

Q19

Are there any other issues or problems with the revised Standards, that you haven't mentioned yet?

To increase the variety of vegan dishes, we suggest that all menu items labelled 'vegetarian' in the standard be made vegan. This can usually be done by replacing cheese and eggs with functional substitutes. This should also increase the variety of kosher and halal dishes. For example there are a number of vegan "Macaroni and cheese" recipes available online.

We recommend that non dairy milks be the default milk offered. Only a minority of the world's adult population can properly digest cow's milk. In people of Australian Aboriginal or East Asian descent, less than 30 percent are able to digest cow's milk. Symptoms of lactose intolerance include abdominal pain, bloating, flatulence, diarrhoea, nausea and vomiting.

We strongly recommend that processed meats, such as ham and bacon, be removed from the revised Standards and they should explicitly state that processed meats should not be included in menus. The World Health Organisation has declared that processed meat is "carcinogenic to humans" and "eating processed meat causes colorectal cancer". It may also cause cancers of the oesophagus, lung, stomach and prostate. For references see: <https://www.veganaustralia.org.au/processedmeat>

Page 17: Follow up

Q20

Yes

Would you like Kim Crawley at the ACI to get in touch with you, to talk further about the Standards? (Kim is the manager of the ACI Nutrition Network)

Page 18: Follow up

Q21

Please provide some contact details so that Kim can follow you up:

Name	Greg McFarlane
Email Address	greg@veganaustralia.org.au
Preferred Phone Number	0400492157
