**BDA NI Board response to consultation -**

**NORTHERN IRELAND FOOD STRATEGY FRAMEWORK**

**Food at the Heart of our Society - A prospectus for Change**

**QUESTION 1. Do you agree with taking a food systems, whole of government approach through a NI Food Strategy Framework?**

**• Completely agree**

**• Agree**

**• Neither agree/disagree**

**• Disagree**

**• Completely disagree**

The British Dietetic Association (BDA) is the professional association for dietitians and strives to improve the health of the nation by supporting our members to promote good food and nutrition. Dietitians and the wider dietetic workforce believe in the importance of health to the success and development of our communities.

BDA NI Board welcomes a food systems approach, but it needs to address “all the activities and elements involved in feeding a population”. The current focus is largely on promoting and supporting the essential economic benefits that agriculture and food manufacturing bring to Northern Ireland. Nourishing the population is vital as access to healthy food is one of the basic human rights required to maintain physical and mental health and wellbeing. Production, processing, packaging, distribution marketing, consumption and disposal of food are incorporated within “all the activities and elements involved in feeding a population”, however optimising nutrition for the NI population is not given the priority focus it requires.

**QUESTION 2. What are your views on taking a Food Systems “whole of government” approach through a NI Food Strategy Framework?**

BDA NI Board strongly supports this approach. Food is at the heart of a healthy society and this longer-term strategic approach across all food polices has the potential to affect the lives of the whole population in Northern Ireland.

We recognise that food policy in NI is fragmented, and NI needs a whole system approach to food which recognises that public health, climate change, sustainability, food insecurity, farming, food production and health inequalities are all interrelated. The Food Systems “whole of government” approach is essential to tackle food insecurity, malnutrition (both over and under nutrition), protect vulnerable groups and prevent and improve management of long-term health conditions like diabetes and obesity, that are in part caused by poor food choices, bad diet and / or lack of access to healthy foods.

BDA NI Board very much approves of a strategy which is co-produced and co-owned jointly across all NI Government Departments. Food is so much part of and essential to life, so the strategy has relevance to every government department. We recognise the challenge will be implementation of the strategy and carefully defining how the “whole of government approach” will be actually delivered.

We consider the approach needs to be wider than just across Government Departments. BDA NI Board recommends, that for the most effective long lasting food strategy, greater involvement at the development and implementation stages are required from the community and voluntary sectors, consumers, the food industry and third sector organisations such as professional bodies, including the BDA.

The goal to improve health, environmental, social and economic goals, with the aim of providing cohesive policies designed to improve the food system within NI is important and if it adopted along with integral support mechanisms for partnership working and information sharing, has the potential to make significant changes in our food system.

Essentially a communication strategy needs to be included in the Food Strategy framework to ensure that all stakeholders communicate effectively with each other.

**QUESTION 3. What are your views on the strategic context identified?**

BDA NI Board agrees with the strategic context described. We do however sense an excessive focus on economic drivers. Nutrition is relevant to most of the Programmes for Government Outcomes. However, these outcomes are so vague there is a risk of being ignored if other drivers are deemed more significant or urgent.

Yes, we agree food is central to the NI economy, however the strategy also needs to encompass the fact that NI currently has the poorest dietary health, relative to other parts of the UK. BDA recommends that high quality, nutritious food must be accessible to everyone in NI. We strongly advocate for a food system to be put in place that delivers better health outcomes for all. Dietitians in NI see the impact of food insecurity and health inequality every day in their work with children, adults and older people. Poor diet increases risk of illness, reduces a person’s quality of life and reduces their life chances. Obesity leads to heart disease, stroke and cancers. Many older people are malnourished (undernutrition), while many young children brought up in deprivation get too many calories but inadequate nourishment – a recipe for life long ill health. Those living with food insecurity are much more likely to have poor mental health. BDA NI Board is very much supportive of the fact that a healthy sustainable diet not only has a lower environmental footprint, but is also one which is acceptable to consumers and is economically viable for them.

As the NI Food Strategy, it is essential previous strategies involving food for health and nutritional reasons are referenced and enabled to be fulfilled.

**QUESTION 4. From your perspective, are there any other NI government policy**

**linkages which you feel are relevant?**

BDA NI Board considers the following are relevant:

“A Fitter Futures for All” (2013), contains actions to redress our current eating habits in Northern Ireland and ensure we make healthier food choices. The NI Food Strategy must reference and support further on-going implementation of the recommendations contained within “A Fitter Future For All”. Obesity prevention - framework and reports | Department of Health (health-ni.gov.uk)

The “Food in Schools Policy” (2013) advocates a “whole-school approach” to all food provided in NI, so any NI Food Strategy must reference this Policy, seek to enable ongoing implementation on the “Food in Schools Policy” and work with the Department of Education. Food in schools policy | Department of Education (education-ni.gov.uk)

Throughout the UK, local planning authorities are being encouraged to restrict planning permission for takeaways and other food outlets in the vicinity of schools. BDA NI Board advocates this approach is included within the NI Food Strategy. We advise consideration should be given to The impact of hot food takeaways near schools in the UK on childhood obesity: A systematic review of the evidence | Request PDF (researchgate.net). An example of policy work in this area is the Scottish Government publication, “Beyond the School Gate - Improving Food Choices in the School Community”. https://www2.gov.scot/Resource/0044/00449317.pdf

In the “Child Poverty Strategy” (2016), it references poor / bad diet, as contributing factors towards child poverty. The NI Food Strategy must address how it intends to reduce child poverty through improving access, availability and education to achieve a healthy diet for those children living in poverty. The Child Poverty Strategy | Department for Communities (communities-ni.gov.uk)

BDA NI Board recognises soft drinks are manufactured in NI. Of relevance, in April 2018 the UK government introduced the Soft Drinks Industry Levy (Sugar Tax), to help tackle childhood obesity. The Levy encouraged many manufacturers to reduce the sugar content of commercial drinks, to avoid an increase in price, but many sugary drinks that are subject to the levy are still on supermarket shelves and are generating tax for government. Soft Drinks Industry Levy - GOV.UK (www.gov.uk)

The reduction in the sugar content of many drinks has been welcomed by the BDA NI Board. However, we would like to know how the tax raised from drinks subject to the Levy has been invested to help tackle childhood obesity in Northern Ireland, and what government has done to date to measure the benefits of the levy. The proposed NI Food Strategy should reference the Soft Drinks Industry Levy, how the Levy has been invested and benefits from it. The NI Food Strategy must also consider how learning from the Soft Drinks Industry Levy could be applied to other sectors of the Food sector. The NI Food Strategy should also seek to expand how taxes raised from levies on unhealthy foods, can be invested into the promotion and availability of more healthy diets, food and drinks.

**QUESTION 5. What are your views on the proposed ambition of the NI Food Strategy Framework?**

BDA NI Board considers the ambition to be too food production focused. We consider there needs to be greater focus on health. As already described under question 3, we strongly advocate for high quality, nutritious and sustainable food to be accessible to everyone in NI. Therefore, the ambition needs to include the goal to improve the public’s availability to healthy food choices which will improve population health. To achieve this there needs to be collaboration with all sectors of the food industry from food production, through food manufacturing to food retailers. The ambition also needs to include much more education across all levels of society, about how to shop, cook and eat a healthier sustainable diet. Consideration is needed for incentives for consumers to buy, prepare and eat the healthier choices. NI consumers need to be supported so the healthier choices are the easier choices for the whole NI population.

**QUESTION 6. What are your views on the proposed scope of the NI Food Strategy Framework?**

BDA NI Board recommends the scope of the proposed NI Food Strategy needs to include collaboration with all sectors of the food industry - from food production, through food manufacturing to food marketing, retailers and consumers to increase the percentage of healthy food purchased and eaten. Producing more healthy food “on the farm”, does not guarantee that the public will have a more healthy, sustainable diet or choose food wisely. Much needs improved across all these sectors and there also has to be links with education and health.

Consumer values and behaviours do not quite marry up with healthy food choices. For example, yes NI produces beautiful, high-quality vegetables, however how will the NI Food Strategy plan to educate and enable the population towards a healthier choice of food that actually gets eaten, and reduce expenditure on less healthy foods?

**QUESTION 7. What are your views on the proposed vision of the NI Food Strategy Framework?**

BDA NI Board considers the vision is strong in describing an economically and environmentally sustainable food system, to help make informed food choices, but it lacks punch to enable those food choices to be promoted within the food retailing sector or to promote the importance of education to assist people to know what to buy, shop and eat. There needs to be healthier choices actively promoted and marketed at point of sale with price incentives to encourage purchase.

Informed, healthy choices do not just happen. Education and practice need to be sharper and more abundant. There must be changes in food provision with reduction in package and portion sizes and strategic taxing of high fat, salt and sugar food items such as takeaways, cakes, pastries and confectionary. Restricting access to food in some situations, for example in shops that are not food shops, access to and availability of fast-food outlets close to schools, offering free school meals and maintaining it over school holidays, breakfast clubs for children, reviving Sure Starts and greater provision of luncheon clubs for older people and those isolated by disability etc. These are some steps that would enable people to eat more healthy food, so people would become more acquainted and understand better what healthy food looks and tastes like. BDA NI Board strongly recommends the food strategy has a vision for healthy food options to be the normal go to food choices with price, promotion and marketing incentives encouraging healthier choices.

**QUESTION 8. What are your views on the proposed aim of the NI Food Strategy Framework?**

BDA NI Board considers the proposed aim is comprehensive, however there is the potential for complexity in co-production of policy that needs to be supported with new ways of working and information sharing which will require strong leadership and reporting structure that leads directly to the NI Executive.

We recommend amending the wording to read - “to guide long term healthy food decision making with an emphasis on improving health”.

**QUESTION 9. Do you agree with the proposed six strategic priorities?**

**• Strongly agree**

**• Agree**

**• Neither agree/disagree**

**• Disagree**

**• Completely disagree**

BDA NI Board recognises the six priorities are similar to national and international recommendations included in whole systems approaches to food policy.

The nutritional needs through the ages and stages of life need to be considered so that the whole population has access to nourishing food throughout the lifespan. The whole purpose of food is health, therefore anything that does not enhance health should not be a priority within the proposed strategy. The ultimate aim should be to have a healthier NI population. Therefore, BDA NI Board strongly recommends nutrition needs to be given greater status within the strategy.

**QUESTION 10. Are there any amendments or refinements that you would like to make to these priorities?**

**Priority 1** –

BDA NI Board requests greater involvement of dietitians to ensure that dietetic expertise of working at a public health level interface is incorporated into the strategy. Dietitians could play a key role in fine tuning the Food Strategy’s recommendations and overall implementation. This would enable qualified nutritional and food sustainability perspectives, including assessment, intervention to bring about positive behaviour change.

Dietitians working in health, both clinical and public health in NI have a lot to offer in terms of role in food in promoting good health, preventing food related health problems and supporting food sustainability. Many health problems stem from a lack of access to the right food, easy access to and cost of less healthy foods, poor food choices through lack of knowledge and poor food preparation and cooking skills. Dietitians not only understand these dynamics, but they also bring the essential knowledge and skills that will assist in addressing these problems. Dietitians have the knowledge and skills to support people directly, however frequently intervention from dietitians is requested too late. Dietitians apply the science of nutrition to support people in making health maximising food choices throughout life. Dietitians across NI are involved in the delivery of wellbeing initiatives from early years, throughout childhood and early adulthood, working and later life. Enabling Dietitians to have greater impact at a population health level will have more impact. Public Health Dietitians should be the first point of contact. Public Health Dietitians are commissioned by the Public Health Agency in NI, use evidence-based nutrition interventions to assist people to shop wisely and cook healthy. They have successfully developed, and delivered many innovative community based nutrition programmes which provide the solutions in helping to create a healthier and more equitable food system.These include:-

·         Nutrition matters

·         Cook-it – increasing cooking skills to improve food diversity and improve overall diet quality

·         Work with healthy living centres

·         Work with local councils

·         SureStart

·         Homestart

·         Schools nutrition

·         Webinars

·         NI Libraries

·         Collaborative working with other government agencies e.g. FSA & Safefood

Priority 1 partners – include PHA, BDA NI Board, NI Public Health Dietitians Group

**Priority 2** – BDA NI Board recognises the need for healthier and sustainable food for the NI population. Sustainable food that not only has a lower environmental footprint that is healthy and provides for all nutrients, but also one which is acceptable to consumers and is economically friendly to them. Such food is very much in line with the messaging within the BDA’s One Blue Dot campaign One Blue Dot - the BDA's Environmentally Sustainable Diet Project | British Dietetic Association (BDA) Also the BDA policy statement on sustainable diets. policystatementsustainablefood.pdf (bda.uk.com). We advise reference is made to the One Blue Dot campaign within the NI Food Strategy.

We recommend amending wording within Priority 2 - Northern Ireland will have a sustainable food system which is populated by successful, adaptable businesses with increased levels of productivity, circularity, **“emphasis on healthy eating”,** and innovation, which are competitive and able to maximise opportunities both in the NI marketplace and on the global stage.

Priority 2 Partners - include BDA NI Board. The British Dietetic Association has access to and produces a range of resources using the latest scientific evidence base on diet and nutrition. Dietitians are perfectly placed to interpret the complex science and to communicate national and international guidance to help the public understand what they need to do to improve their own health and that of the environment.

**Priority 3**

BDA NI Board request recognition within the strategy - Dietitians are qualified and regulated health professionals that assess, diagnose and treat dietary and nutritional problems at an individual and wider public-health level.

The public’s perception of good food is frequently linked to its source, appearance and cost. The more appetising or expensive food can equate to “being good”. However, source, cost and taste do not always equate to being healthy or improving / maintaining health. The word “good” should be replaced with “healthy”. Interestingly healthy eating does not need to be expensive. Eat well, spend less | British Dietetic Association (BDA)

Northern Ireland has a rich food heritage which should be celebrated, it is however essential to recognise the increasing diversity within our culture with 11% of the NI population born outside the country. Some of the most common countries of origin include other UK regions, India, Lithuania and the Philippines. [PR\_600731\_Census\_2011\_Ireland\_and\_Northern\_Ireland\_web\_version\_links.pdf (cso.ie)](https://www.cso.ie/en/media/csoie/census/documents/north-south-spreadsheets/PR_600731_Census_2011_Ireland_and_Northern_Ireland_web_version_links.pdf)

Dietitians are already working to establish relationships with these groups to help educate on food and health and have developed resources to compliment this work including the BME section of the Cook it! Programme. [Cook it! Fun, fast food for less: community nutrition education programme | HSC Public Health Agency (hscni.net)](https://www.publichealth.hscni.net/publications/cook-it-fun-fast-food-less-community-nutrition-education-programme)

The BDA considers it is essential that this diversity of culture is recognised and integrated into the Food Strategy. The Importance of Diversifying Healthy Eating Advice | British Dietetic Association (BDA)

Cultural Diets and the need for diversity in dietetics | British Dietetic Association (BDA)

Priority 3 Partners - include BDA NI Board

**Priority 4** BDA agrees that a reduction in food waste is of great importance both for individuals and the region as a whole. Dietitians are excellently placed to educate and support communities to reduce food waste. During the height of the Covid-19 pandemic dietitians were involved in supporting Food banks to ensure food parcels contained foods which would help contribute to a healthy balanced diet. Dietitians also stepped up on a regional basis with virtual education sessions on saving money on food shopping.[**https://vimeo.com/showcase/8198914**](https://vimeo.com/showcase/8198914) Dietitians have developed and delivered training to community tutors on the PHA “Food Values” programme which supports people to make healthier food choice within a limited budget so reducing waste.

Priority 4 Partners – include BDA NI Board

**Priority 5** BDA NI Board recommends key features of this priority should include developing and supporting **“evidence-based nutrition”** education interventions to improve the understanding of healthy foods and nutrition, how food is produced and the skills of growing fruit and vegetables, rearing animals for food, cooking, and minimising food waste. As dietitians are recognised as nutrition experts, for this strategy to be successful, we strongly recommend BDA and dietitians lead on the development and implementation of evidence-based nutrition education interventions. There needs to be an increase in awareness and training of nutrition – educating both the public and key agents as this will allow consumers to make more informed choices as well as allow food system players to implement more informed measures.

Dietitians are the only nutrition professionals to be regulated by law, and are governed by an ethical code to ensure that they always work to the highest standard. Dietitians have specific skills in nutrition education, enabling them to train and mentor others, including those delivering relevant food education. Dietitians in NI have extensive experience and expertise in training, advising and supporting others in health, social care and education to promote safe, sustainable and healthy nutrition, Consumer food habits are important factors which determine dietary intake. Behaviour change approaches used by dietitians can assist in making improvements and supporting the development of skills and food literacy. Consumer demand and purchasing power shape the incentives that farmers have to maintain a diverse array of crops. Therefore, dietitians have a key role in building consumer knowledge and practices, which can help to reshape food systems towards greater diversity, health, inclusiveness and sustainability.

The BDA NI Board recommends support and investment is needed for healthy lifestyle and food skills programmes, such as the BDA’s Let’s Get Cooking. Lifestyle programmes such as this can be delivered through schools, in the community or as part of health and social care services. Everyone has an important role in helping children and families learn and develop appropriate skills to maintain a healthy diet and weight from childhood into adulthood. Let’s Get Cooking uses a skills progression approach. A rigorous evaluation of the Let’s Get Cooking programme confirmed that the model is effective in teaching healthy cooking skills, transferring these skills from the school’s cooking club to home and encouraging participants and their families to eat more healthily. BDA NI Board and members in NI have tried to get the BDA “Let’s Get Cooking” Programme implemented in NI. However, implementation and delivery of this programme needs to be resourced by government. We deem that learning to eat well, make health choices and prepare cost effective meals should be embedded firmly into the school experience. British Dietetic Association | (letsgetcooking.org.uk)

Across NI, Dietitians deliver Community nutrition skills programmes. There is great potential for Dietitians to add significant value under this priority. The focus appears very much on education of children and within schools. What about other education – adult and lifelong learning opportunities re food and nutrition? Dietitians across NI are currently involved in the delivery of wellbeing initiatives from early years, throughout childhood and adulthood. What about agri food workers education re food and nutrition – food producers, processors, caterers as well as consumers – the full food chain? There is huge potential for dietitians to educate people working across all these sectors. BDA NI Board advocates that as regulated nutrition experts, dietitians can protect and improve public health by working with agri food businesses and their employees. BDA and dietitians have a view right across the whole food system. BDA NI Board asks for recognition of the benefits of having dietitians working alongside the Agri-food and Education sectors to offer advice, training and practical guidance compatible with a sustainable and healthier food environment in NI. We ask for the vision to be realised to allow dietitians full potential to work across the food system and make a real and lasting difference.

Within the proposed strategy reference is made to nutritional standards. BDA NI Board advises any nutritional standards used must be evidence based and there needs to be monitoring of their implementation and reward for compliance. We are aware of the beneficial work to date in developing nutritional standards for public sector procurement in NI. We strongly advocate for this to continue and progress as we recognise government needs to lead by example. BDA NI Board asks for recognition within the strategy for the important role that dietitians play in working within the public sector in advising on healthier processes, portion sizes, promotions and nutritional standards.

Priority 5 Partners - include PHA, BDA NI Board and NI Public Health Dietitians Group

Priority 6 Partners - NI Public Health Dietitians Group played a significant role when Covid-19 struck, by advising Dept of Communities, PHA and the voluntary and charitable sectors on a range of issues including food parcels, best use of food parcels, and creating other tools to assist vulnerable communities suffering from food insecurity.<https://www.dhcni.com/news/making-the-most-of-your-food-parcel> They continue to work with food banks across NI. Also, as a result of Covid-19 with the need to change approaches, the NI Public Health Dietitians Group developed an innovative series of regional public nutrition webinars were developed. Webinars covered information on nutrition for babies through to older adults and everyone in between. This platform enabled evidence-based nutrition information and expertise to be delivered during a time when the pandemic had exacerbated already difficult situations.

**QUESTION 11. From your perspective, are there any strategic priorities that are missing from the NI Food Strategy Framework? If ‘yes’, what are they and why?**

Yes

Need a strategic priority around food manufacturers and retailers to produce and do much more to promote healthy eating choices, by reducing production and retailing of less healthy options.

Need a strategic priority around access, availability and cost of healthy food choices. To make the healthier food choices the more attractive and go to options for the consumer.

Need a strategic priority around how revenue raised from taxes, for example, sugar levy is reinvested into healthy eating initiatives.

**QUESTION 12. What are your views on the proposed guiding principles to be used to guide the development of future policy interventions?**

The guiding principles could be utilised to examine the current policy and implementation to review strategies that are currently being undertaken and the identification of areas of good practice and information sharing across all policy areas that could form the foundation for future interventions.

Principle 2 add - Collaboration and Leadership - improved integration, shared responsibility in “healthy” food related policies and programmes.

Include dietitians under principle 2

Principle 3 - Dietitians can contribute valuable information to the evidence base.

Principle 4 - BDA NI Board very much approves of the ‘Right to Food’ approach. A rights-based approach would ensure NI government must consider the impact of all its policies on NI citizen’s ability to access a healthy diet. We believe that a focus on the ‘Right to Food’ would ensure that the broad range of forms of food insecurity are considered. Although poverty is a key reason for food insecurity, it is not the only one, with many people being food insecure for reasons such as reduced physical or mental capacity, poor housing, poor access, social isolation or illness. BDA considers the term ‘Food Sovereignty’ describes what people’s right to food should be. Food Sovereignty is about the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems.

Principle 5 - Please include health too.

**QUESTION 13. From your perspective, are there any guiding principles missing? If yes, what are they and why?**

BDA NI Board considers greater emphasis is needed on the promotion and marketing of healthier food choices. Restriction of the promotion and marketing of foods high in fat, sugar or salt are essential to establish healthy environments that encourage and enable people to select and eat a healthy diet more easily.

BDA NI Board recommends there is a need for a change in culture in NI to ensure everyone has access to a wide range of healthy food choices when eating out including opportunities for children and young people to access food and drink on the way to and from school. We advocate for an increase in availability and promotion of healthier options at all food outlets (including shops and mobile units) especially in the vicinity of schools.

**QUESTION 14. Do you agree with the high level vision, principles and strategic areas contained in the proposed NI Food Strategy Framework?**

**• Completely agree** if the high level vision and principles are transferred into strategic policy areas that are implemented with leadership and accountability.

**• Agree**

**• Neither agree/disagree**

**• Disagree**

**• Completely disagree**

**QUESTION 15. Have you any other comments on the proposed NI Food Strategy Framework?**

There needs to thought around how accountability is measured in terms of food producers and retailers promoting and supplying healthy food choices. Food is grown, produced and sold to be eaten – the end product needs to be beneficial to good health.

BDA NI Board believes greater involvement is needed of private, community and voluntary sectors. There is mention of such sectors within the strategy however we consider their involvement is essential in the early planning, development and implementation. We deem the proposed strategy is too public sector/government department focused. Cross government department linkages are being proposed. However, to be truly effective, this strategy needs to be cross cutting across food industry, community and voluntary sectors, with the consumer voice firmly heard.

**QUESTION 16. What are your views on the proposed approach to implementation, i.e. five year action plans will be developed and implemented in collaboration with key stakeholders and partners?**

We suggest a similar to reporting structure to the Food Strategy as for the Fitter futures with information published on targets and review at regular intervals.

BDA NI Board have concerns there is little mention of third sector organisations, such as professional bodies. It is paramount for third sector organisations to be closely involved in the implementation of this strategy. Relevant food, nutrition and health professional bodies, including the BDA, have considerable expertise and support to offer to the successful implementation and roll out of the proposed strategy.

As detailed under Question 15, we also strongly recommend the voice of the consumer is heard, listened to and acted upon*.*

**QUESTION 17. What are your views on the establishment of a Food Programme Board that is embedded within the governance arrangements for Green Growth?**

It is required but need to ensure those with a strong evidence base in nutrition are included within the Food Programme Board, including dietitians.

Public health dietitians will be key in the delivery of many of the objectives and implementation of the proposed food strategy.

[What do public health dietitians do? | British Dietetic Association (BDA)](#:~:text=Public%20health%20dietitians%20help%20groups%20of%20people%20to,healthier%20food.%20Who%20do%20public%20health%20dietitians%20help%3Q18)

Engagement and communication of information will be at the core of providing a successful food strategy and a reporting structure. Cross government department agreement on the setting up of robust and ongoing systems for evaluation and monitoring will be essential. Political leadership is essential for longevity of the strategy. Including the NI Executive is an important priority to gain cross party ministerial support to ensure the continuation and progression of the strategy.

**QUESTION 18. Do you have any comments on future arrangements for engagement with stakeholders about implementation and delivery of the NI Food Strategy Framework?**

Yes

Ensuring timely engagement with stakeholders will be crucial. Also ensuring adequate and appropriate resource is available for implementation and delivery.

Regards suggested foundation projects for the strategy’s early implementation, to encourage schoolchildren to eat more fruit and vegetables – we recommend this is implemented via the Regional Food in Schools yearly workplan. Recognition and enablement however will also be required for additional staffing resource using Public Health Dietitians / Registered Nutritionists for implementation.

BDA NI Board strongly recommends the correct professionals are sought to provide nutrition advice. Many people claim to be experts in nutrition yet have very limited knowledge and offer no protection to the public. Therefore, having engagement with the correct nutrition professionals for implementation and delivery of the food strategy will be essential. [Dietitian or nutritionist? | British Dietetic Association (BDA)](https://www.bda.uk.com/about-dietetics/what-is-dietitian/dietitian-or-nutritionist.html)

**QUESTION 19. Have you any other comments on how to achieve a diverse and inclusive process for public engagement?**

Reach out to Professional Bodies for expertise, e.g. British Dietetic Association!

The whole population needs to be brought into the development, implementation and roll out of this strategy. Innovative and creative ways need to be considered to ensure a population wide response is captured. A customary consultation approach is unlikely to target and engage the general public. A traditional consultation response format such as this is at risk of not portraying accurately and adequately what the whole population needs, aspirations and wishes are and is unlikely to promote innovation or shared commitment. There is a strong need to engage the public with this issue which will likely take more thought, energy and time and a shift in culture. Deliberative research / citizen jury approaches would allow the issues of food to be explored in greater detail with the general public.

BDA NI Board strongly recommends the need to work alongside communities and people with experience of food insecurity to ensure the food strategy is meaningful, clear and adopted by everyone. We advocate a method to do this is to work with the existing dietetic led nutrition community based initiatives and allow Dietitians to actively support the implementation of the NI Food Strategy framework.

**QUESTION 20. Do you agree with the potential benefits to be derived from taking a Food Strategy Framework approach?**

There appears to be no mention of health benefits in taking this food strategy framework approach, therefore, we recommend health benefits are listed and included.

To Fig 6 suggest adding – “improved nutritional knowledge”

BDA NI Board very much agrees there is a need for co-ordinated repositioning of food messages. We urge for joined up non conflicting messages are promoted to the citizens of NI. For the benefits to be fully realised the communication and new partnership working structures will need to strongly supported by government. Without this support we are concerned this may yet be another strategy which could result in ‘business continuing as usual’.

**QUESTION 21. Are there any rural needs comments that you wish to raise at this point about the impact of the NI Food Strategy Framework on Rural areas?**

**Do you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.**

**QUESTION 22. Are there any equality comments that you wish to raise at this point? Do**

**you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.**

**QUESTION 23. Are there any environmental impact comments that you wish to raise at this point? Do you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.**

**QUESTION 24. Are there any other comments you wish to make or any other evidence of need that you think Departments would find helpful? Please submit any evidence with your response.**

BDA NI Board strongly urges the need for interdepartmental government working plans and budgets to fully achieve the ambitions of this food strategy. Without interdepartmental working plans and joined up budgets, BDA NI Board are concerned the innovation and advances indicated will not be accomplished, and instead continuation of a disjointed food system will be the result.

BDA - Any Section 75 comments - There needs to be a recognition of the diverse population in Northern Ireland from a range of ethnic groups with different food cultures.