

The incorporation of food environments into the Brazilian National Food and Nutrition Policy: an approach to possibilities, advances and challenges

A incorporação dos ambientes alimentares na Política Nacional de Alimentação e Nutrição: uma abordagem de possibilidades, avanços e desafios

La incorporación de los ambientes alimentarios en la Política Nacional de Alimentación y Nutrición: un enfoque de posibilidades, avances y desafíos

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In the debate article entitled *Advances and Setbacks in the 20 Years of the Brazilian National Food and Nutrition Policy* ¹, the authors address historical, theoretical, and methodological aspects from the perspective of elaboration, implementation, and advances of the Brazilian National Food and Nutrition Policy (PNAN). The discussion of the article is mainly based on the stages of the theoretical model of the public policies cycles adopted in the study of the PNAN, synthesis and comparison between the guidelines of the first edition of the policy (1999) ² and its updating, which occurred in 2011 ³. The authors discuss in a very interesting way the advances and challenges of politics, detailing its main actions and programs.

Regarding the inclusion of the approach of food environments in the PNAN, it is noteworthy that the scientific production on the subject is relatively recent in Brazil, and, therefore, it is essential to contextualize the evolution and maturation of the debate on this theme .

In the late 1990s, Egger & Swinburn ⁴ gave voice to the environmental approach to obesity, discussing the need to change the traditional view of obesity as an individual disorder that requires treatment for an ecological approach that considers obesity as a normal response to an abnormal environment. In this sense, they suggested that understanding, measuring, and altering the “obesogenic” environment was fundamental to reverse the increasing cases of this disease ⁴ and the central elements of the model proposed for the obesogenic environment ⁵, in which contemporary definitions of food environments are present. More specifically in relation to the studies of food environments, there is another advance in the theme from 2005, when Glanz et al. ⁶ propose a theoretical model that operationalizes the measurement of the food environment and organizes the variables of the environment in dimensions – community, consumer, organizational and informational environment. Despite the limitations of the model that are discussed today, such as presenting a more restricted approach focused on the nutritional aspects of food, it is essential to recognize that the aforementioned models were guidelines for metrics and scientific production in this area.

Therefore, from the 1990s until today, the theoretical and methodological framework of the theme of food environments has evolved and some points revealing these advances include conceptual evolution, incorporating the issue of access to food and also improving the delimitation of its dimensions ⁷; comprehension of food environments as an integral part of food systems and point

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of intersection between food production chains and consumers⁸; and the proposition of conceptual models that seek to incorporate different realities, such as that of low- and middle-income countries and the formal and informal environment of food retailing^{9,10}.

Specifically, in relation to PNAN, it is noted that the first edition, published in 1999², presented the human right to food and food and nutritional security as principles, which were considered in different dimensions. The main purposes of PNAN were to guarantee the quality of foods available for consumption in the country, the promotion of healthy eating habits and the prevention and control of nutritional disorders, especially nutritional deficiencies. It is also noteworthy the stimulus to intersectoral actions that favor universal access to food, which reflects in its guidelines and definitions of responsibility.

Despite the mentioned focus, among its guidelines, principles and approaches of aspects that are recognized today as part of the food system and, more specifically, of food environments can be identified. In the guidelines “encouraging intersectoral actions with a view to universal access to food”, “ensuring food safety and quality and providing services in this context” and “promoting food practices and healthy lifestyles” actions are recommended on agricultural production and supply, nutritional labeling and marketing practices, respectively. Although nutritional labeling is mentioned, at that time there was a greater concern in the guideline concerning the sanitary quality of food, records in animal products regulatory agencies, etc. Regarding the recommendations for monitoring marketing practices, we emphasize the presence of a significant initial debate on the need for a regulatory agenda focused on food, which we understand as one of the major determinants of food practices that are present in the various food environments currently studied, such as the consumer environment⁶ and the digital environment¹¹.

In 2012, the PNAN was revised³, with the collaboration of different actors of civil society, technical-scientific community and management, in a social, epidemiological, food and nutritional scenario very different from that of the first edition, emphasizing the rapid increase in the prevalence of obesity and the worsening of the quality of food in urban centers. In the current edition, the role of the environments is highlighted, with greater clarity on the recognition of the contextual determinants of health, food and nutrition of individuals and the population: “*Coping with this situation calls for actions in the several sectors, from production to the final commercialization of food, with the guarantee of environments that promote the change of conduct of individuals and society*”³ (p. 20).

In the current edition of PNAN³, the theme of healthy eating environments converges directly in some guidelines. In the second guideline, “promotion of adequate and healthy eating” (PAHE), the need to create health-friendly environments in which individuals and communities can exercise healthy behavior is mentioned. Although community or institutional scenarios are not specified, this concern becomes more explicit. There is also a more emphatic incorporation of the issue of environmental sustainability, prioritizing adequate and sustainable productive practices with minimal amounts of physical, chemical, and biological contaminants.

This guideline can also be expanded, with regard to sustainability, incorporating elements of the revised and expanded definition of the food environment, recently proposed by Downs et al.¹⁰, which is then understood as the interface of the individual with the food system, which encompasses the availability, accessibility, convenience, promotion, quality and sustainability of food and beverages in natural spaces (wild and cultivated) and built (formal and informal markets) that are influenced, among others, by the ecosystems in which they are inserted. The definition has as main innovation include attributes of food and beverage sustainability, aiming to integrate the relationships between food environments and sustainable diets, showing the need for the food environment to also promote environmental sustainability.

The seventh guideline of the PNAN, which addresses food control and regulation, also incorporates significant issues for the debate on healthy and sustainable food environments, such as the regulation of food labeling and nutritional information and food advertising, based on the perspective of the right to information and the need for a regulatory agenda. Another advance refers to the proposition of the creation of organizational food environments that should encourage and promote adequate and healthy eating, focusing on the supply of healthy foods in schools and work environments. Moreover, this guideline reinforces that the supply of healthy foods should also be stimulated between small food shops and meals of so-called “street food”. In this sense, it is presupposed the com-

mitment of the guideline to the theme of the retail food environment, focusing directly on issues that benefit the consumer, also verifying the emphasis for the creation of organizational and healthy food environments, considering both formal and informal food trade. Note that, in the expanded definition of food environment¹⁰ all commercialization points of the supply chain must be considered, which is a current, necessary and timely debate.

Finally, the ninth guideline, “cooperation and articulation for food and nutrition security”, stands out, directing actions in the dialogue of the food system and food environments, highlighting as an example those directed “to the dialogue with the sectors responsible for agricultural production, distribution, supply and local food trade aiming at increasing access to healthy foods; the promotion of adequate and healthy food in institutional environments such as schools, creches, prisons, hostels, workplaces, hospitals, community restaurants, among others”³ (p. 53-54).

Therefore, it seems that even though the term “food environments” is not explicitly, progress in the conceptual and methodological field contributed to the incorporation of elements that compose them in the PNAN agenda, although it was not yet possible to deepen and to expand the scope of the interventions proposed in its guidelines at the time of its publication, since the discussion was still incipient in the academic sphere.

It is also verified that among the publications of the first and second version of the PNAN, several policies and actions addressed or considered the relevance of the study of the environment in the scope of their actions. Although this comment is not intended to inventory all initiatives that address the theme, we will cite a few examples.

Adequate and healthy eating is part of a priority theme of the Brazilian National Health Promotion Policy (PNPS) in the current edition of this policy of September 28, 2017¹², and reinforces the recommendations of the Global Strategy for the Promotion of Healthy Eating, Physical Activity, and Health¹³.

In the context of the PAAS, other examples of initiatives addressing issues related to the food environment can be cited. One of them is *Interministerial Ordinance n. 1,010*, of May 8, 2006¹⁴ of the Brazilian Ministries of Health and Education, which instituted the guidelines for the promotion of healthy eating in schools nationwide. The fifth article discusses the implementation of the following actions: restricting the supply and sale of foods with high fat content, saturated fat, trans fat, salt, and sugar-free; developing healthy food and meal options at school; stimulating and supporting school feeding services in the dissemination of healthy options and developing strategies that enable these choices; and incorporating the theme of healthy eating in the school’s political pedagogical project.

Another regulatory measure focused on organizational environments was *Ordinance n. 1,274*¹⁵. Published in 2016, it provides for PAHE actions in the work environments, to be adopted within the Brazilian Ministry of Health and related entities. Some actions contemplated in the ordinance relate to the exclusive and varied offer of fresh or minimally processed foods and culinary preparations, following the recommendations of the *Dietary Guidelines for the Brazilian Population*¹⁶, in the organized events, as well as by the companies contracted to provide meals in events held by the Brazilian Ministry of Health. It also includes an incentive to the acquisition and consumption of organic and agro-ecological foods, the adoption of measures to reduce the supply of processed foods and a ban on direct sales, promotion, and advertising of ultra-processed foods.

The *Dietary Guidelines for the Brazilian Population*¹⁶ is another example of a strategy for PAHE whose principles dialogue with the concept of food sovereignty and with an incentive to the adoption of food systems and sustainable food environments.

In a statement, the editions of the PNAN published so far are sensitive to the issue of food environments, even if in some points the narrative of the policy and its guidelines are not explicit or do not directly incorporate the most used concept at the moment on the theme, which was to be expected in view of the moments of publication of each of them.

Important advances are perceived as the incorporation in the PNAN of aspects related to the consumer’s food environment, regulation of healthy community and organizational food environments, the regulation of aspects related to the consumer’s food environment and sustainability in components of the production chain; that denote advances consistent with the level of intellectual maturation of the scientific community and sensitivity of the Brazilian governments of the time. This debate has great potential for continuity and qualification. It is believed that the policy incorporates

the dynamism of food environments and their new concepts and elements that support the implementation of improvements in food environments and, it is emphasized the importance of intersectoral actions of public policies that may focus more incisively on food systems, which, in turn, will contribute to deepening, potentiating and directing this dialogue.

Contributors

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Additional informations

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