

13 October 2025

ATTN: Australian Department of Agriculture, Fisheries and Forestry

foodsecurity@aff.gov.au

Subject: Response to National Food Security Strategy: Discussion Paper

Thank you for the opportunity to respond to the *National Food Security Strategy* discussion paper.

The Western Australian Health Promotion Foundation (Healthway) is the only State Government agency solely dedicated to health promotion and preventative health in Western Australia (WA). Healthway work focusses across five priority health areas, including promoting healthy eating, to prevent chronic disease. All Australians, regardless of where they live, need regular, reliable access to healthy food, which is essential to reduce the impacts of overweight and obesity, which has overtaken tobacco as the number one factor contributing to chronic disease.¹

We recognise that food security is a widespread issue in WA and nationally, with more than one in eight households nationally (13.2%) experiencing food insecurity in 2023.² This underpins the need for Australia's first food security strategy.

We commend the Department of Agriculture, Fisheries and Forestry on its work in developing a discussion paper to inform critical strategy in this space and are pleased to provide the enclosed response.

Should you wish to discuss any aspect of our submission further, please do not hesitate to contact me on 9488 6839 or email carina.tan-vanbaren@healthway.wa.gov.au.

Yours sincerely

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About Healthway

Healthway is the only State Government agency solely dedicated to health promotion efforts in Western Australia (WA). We work across systems to create healthy environments, motivate behaviour change and influence policy to reduce and eliminate barriers to good health.

Healthway's work focusses on creating healthy environments to support our community to make more informed choices about health and leading a healthy lifestyle, reducing the need for hospital and clinical care. We do this through health promotion campaigns and education, grants and partnerships with sports, arts, racing and community organisations, research, and advocating for and coordinating policy and systems change across government and non-government organisations.

Response to National Food Security Strategy Discussion Paper

We commend the Australian Government's Department of Agriculture, Fisheries and Forestry on developing the discussion paper to inform Australia's first National Food Security Strategy. This is an important step to not only boost the productivity, resilience and security of Australia's food system, but also ensure that quality, affordable and healthy food is available and accessible to all.

Please find our response below to the six questions posed for discussion.

1. What other principles should government, industry and community prioritise to support the development of the strategy and why are these important?

Healthway notes the development of the strategy will be shaped by the following proposed principles of:

- Whole of food system
- Collaborative
- Ambitious and forward-looking
- Outcomes-based and practical.

Healthway proposes the following to broaden and strengthen these principles.

Consider how industry and community will be included in the strategy

While food security necessitates a coordinated effort across sectors, leadership from government is essential and should be reflected in the hierarchy of roles within any strategy.³ This means involving key departments in the development of the National Food Strategy, at state and Federal levels, across planning, transport, health, social services, defence and others. Government strategies outline the vision and role of government in setting the framework and guardrails within which commercial actors operate to contribute to food security.

It is noted that the discussion paper indicates responsibility for implementation of the strategy and associated actions lies across governments, industry and community. It is unclear how this will work in practice. Healthway encourages further consideration of how this will occur as well as consideration of appropriate guardrails and protections for industry and community involvement in implementing the strategy.

As a principle, recognise the commercial determinants of food security.

The commercial determinants of health are defined as "the systems, practices, and pathways through which commercial actors drive health and equity". Commercial influences include, for example, the marketing of unhealthy and ultra-processed foods, and industry lobbying to influence regulation in this regard.

The commercial determinants should be discussed in the context of a collaborative approach to food policy and regulation for the food system and food security. There is strong evidence showing regulatory approaches are the most effective at improving the food environment and that industry voluntary agreements and partnerships have limited effectiveness.⁴ A stakeholder map could be developed to outline the commercial and non-commercial actors in the system to help manage these interests.

Another example relating to commercial determinants relates to the role limited supermarket competition plays in food security⁵. Australia's supermarket sector is one of the most concentrated in the world.⁵ Woolworths and Coles account for around two-thirds (65%) of the sector – representing a large concentration of power and price setting ability⁵ Such a market share has been discussed in Commonwealth government Senate Inquiries as allowing supermarkets to use their market power to create unfair relationships with their suppliers.⁵ Supermarkets hold high bargaining power in price negotiations with wholesalers and farmers and can extract a disproportionate level of profits from some products.

As another example, supermarkets can require suppliers to comply with onerous cosmetic food standards.⁵ This can have direct implication for food security when cosmetic fruit and vegetable standards imposed by supermarkets are responsible for considerable volumes of food waste.⁶ Alternatives to the two-supermarket model include food co-ops (i.e., where community members group together to order fresh produce directly from growers and suppliers) which may offer a cheaper and more food secure alternative to the two-supermarket model.⁷

We also draw attention to corporate and industry framing and encourage future strategies and action plans to reflect evidence-based framing. An example would be the use of the term 'global warming and food security' in place of 'climate change and food security' which is a term favoured by industry. 8-11 When industry sets the narrative of health related discussions, they seek to avoid regulation and favour weaker and often ineffective policy solutions, such as public education. 12-14 We strongly recommend following public health evidence of what does and doesn't work at the population level to improve food security and the adoption of evidence-based framing in this regard.

An action plan and funding requirements for implementing the National Food Security Strategy should be identified

In the 2025–26, \$3.5 million over two years was provided for the development of a National Food Security Strategy. ¹⁵ While this is an important first step, it is vital that consideration is given to additional funding beyond the development of the strategy, to ensure it can be fully delivered. It is well documented that funding is critical to ensure that the strategic visions of government are realised. ^{16, 17} For example, the Federal Government invested \$11.8 million over two years for strategy development and early implementation of priority projects for the National Strategy for Food Security in Remote Aboriginal and Torres Strait Islander communities ^{18, 19}. This included

reducing the price of healthy food products (such as canned vegetables) sold in more than 70 remote stores by around 30-50% to help improve food security in remote communities through the highly effective price policy lever.²⁰

2. What timeframe should the strategy work towards – short (1 to 2 years), medium (5 to 10 years) or long (10-plus years) term, and why?

We believe a timescale of five to ten years would be most appropriate. This would allow for the implementation of short-term actions to address food security, health and sustainability challenges, while also building action towards longer-term transformation of the food systems required for health, equity and sustainability. A longer time frame would also allow for more accurate measurement of impact.

To ensure appropriate monitoring and evaluation of the strategy's actions during this time, we recommend the development of program logic models

3. Are there examples of current or planned initiatives by you or your organisation to improve food security in your sector?

As part of its priority focus on healthy eating, Healthway provides grant funding for health promotion research and community projects relating to food security, particularly those addressing food systems that ensure quality, affordable food is available and accessible for all. Two major projects relating to food security are provided below.

Food Community

The Food Community project was established in 2018 as a pilot in the South West region of WA, funded by Healthway. During 2022-2024, it was scaled up with further Healthway funding to a further six WA regions. The project sought to explore many initiatives that support healthy food availability, access, use, stability, agency and sustainability, and strengthen how these initiatives work together to support food security action at the community level. The Food Community website currently outlines 486 food security related initiatives in WA, organised by location on a map and can be filtered by several categories (e.g., emergency food relief programs, health promotion projects, strategies/plans).²¹

Food Community also used Food Action Groups in WA communities across six regional areas to provide opportunity to co-create place-based solutions to food security. The Food Action Groups include a diverse range of stakeholders working collaboratively with governments to incorporate food system solutions into policies and plans and undertake a range of activities to create and support a more sustainable and resilient local food system. An evaluation found 378 partnering organisations were working on 148 food security initiatives across the regions as part of the study.²²

The Food Community project has been disseminated via a website (https://foodcommunity.com.au/), fact sheets²³ (e.g., social supermarkets, community kitchens), academic publications and in peer-reviewed journals.²²

The WA Food Atlas

Food environments have been shown to have a direct effect on alcohol²⁴ and diet.^{25, 26} This project mapped, measured and monitored food environments and access across WA. An online,

interactive tool, 'The WA Food Atlas', was developed to visualise and quantify the presence and location of all food outlets across WA. This project revealed that the food environment of Perth has more than five times as many junk food outlets as supermarkets.²⁷

As a translation tool of this research, three interactive dashboards were produced for:

- Fast Food mapping the density and distribution of fast-food outlets (food swamps);
- Fruit and Vegetables highlighting access to fresh produce. (food deserts); and
- **Alcohol** visualising the location and concentration of alcohol retailers.

The project website (<u>www.australianfoodatlas.org</u>) with dashboards is currently under redevelopment.

- 4. Do the proposed key priority areas and whole-of-system considerations adequately represent the actions needed for an effective food security strategy? If not, what is missing?
- 5. What actions could the strategy take to address challenges under each key priority area?
- 6. What actions could the strategy take to address challenges under these whole-ofsystem considerations?

A combined response is provided for questions 4-6.

We refer to the analysis of 187 submissions conducted by Sustain in relation to the 2023 Federal Inquiry into Food Security in Australia. This report provides a traffic light list of addressed, partially addressed and omitted themes within the Federal Government's 2023 Australian Food Story.^{28, 29}

Aligned with the eight recommendations in the Sustain report²⁸, we provide a number of recommendations below that align with best practice food security approaches and our own priorities to promote healthy eating, including creating environments that promote and increase access to healthy food and drinks and reduce the provision of unhealthy food and drinks.³⁰

Whole-of-system considerations

We note that the proposed structure of the strategy includes three key priority areas (resilient supply chains; productivity, innovation and economic growth; and competition and cost of living) and five 'whole-of-system considerations' (climate change and sustainability; people; health and nutrition; trade and market access; and national and regional security).

We support these whole-of-system considerations but argue that people, health and nutrition, and climate change and sustainability, as fundamental dimensions of food security, should be the greater focus.

Land use laws for healthy food environments

Healthy food environments mean affordable, nutritious and quality food is highly available and access to cheap, unhealthy food and drink is limited. Giving community control over their local area and food environments is a priority for food security. This can be achieved through land use laws that prevent oversaturation of fast food outlets and allow health as a consideration in planning decisions.

In WA, changes to planning laws to limit unhealthy food outlets and support access to healthy food options, including near schools, has been recommended in the Sustainable Health Review.³¹ The Western Australian Health Promotion Strategic Framework 2022-2026 also recommends increasing local access to healthy food and drink and reducing exposure to unhealthy food outlets, particularly for children.³²

The terms 'food swamps' and 'food deserts' have been used to characterise land use for two different types of problematic food environments. 'Swamps' refer to an oversaturation of cheap unhealthy food, including ultra-processed 'junk' food outlets. By contrast, 'deserts' refer to limited access to affordable healthy and nutritious food. In this way, food swamps and deserts can exist concurrently. Recently published research using data from 2022 in Perth found that fast food outlets creating food swamps are most prevalent (11.2 outlets per 10,000 population).²⁷ By contrast, only 1.98 supermarkets per 10,000 population were found, meaning there are five times as many fast food outlets than supermarkets.²⁷ Food deserts are a more prevalent issue in rural, regional and remote areas.^{33, 34}

Income support and affordable housing

Fundamental to food security is financial access. Around 3.5 million people (13%) live below the poverty line in Australia.^{35, 36} Addressing poverty will tackle a root cause of food security. The role that increased income support payments and affordable housing security with walkable access to healthy food would play in food security should be considered.³⁷

Fiscal and price-based measures

As well as maintaining subsidies for reducing the cost of food, such as the GST exemption on fruit and vegetables³⁸, additional fiscal measures on harmful products, such as a levy on sugary drinks and ultra-processed foods, would both increase food security through the taxes by shifting consumer purchasing and raise revenue to support food security and preventative health initiatives.^{39, 40} Robust evidence shows that a health levy on sugary drinks can also encourage manufacturers to reformulate their products and lead to a drop in purchase and consumption of free sugars.

Local sustainable food production (decentralisation) and global warming

Food systems both impact, and are impacted by, global warming.⁴¹ The short-, medium- and long-term impacts of global warming on food security should be considered. Structural strategies to tackle global warming are also strategies for tackling food security, such as incentivising Australian farmers to transition to sustainable food production, or changing land use policy to reduce urban sprawl and thus reduce the distance food travels, or the establishment of new zero-waste food outlets.⁴²

Local and regional land use decisions also have direct impacts on food security. Protecting periurban agricultural land from rezoning for housing development underpins strategies to reduce reliance on imported food and encourages local food to be grown. Local and regional food systems can bolster food security when food production and processing is decentralised.

Food relief

Further clarity on the role of food relief systems in food security should be outlined in a National Food Security Strategy. The broad role of food relief, including emergency food relief, should be

discussed in the context of food security. Specifically, while emergency food relief can offer support in times of acute need or crisis, in its current form, it often does not offer dignified food security.

Food relief systems can help secure the basic right for every person to be food secure. For example, three major organisations providing emergency food relief (Foodbank, OzHarvest and SecondBite) have put forward positions relating to the broad scope of opportunity with food relief⁴³. This includes strengthening programs in schools (e.g., free provision of fruit and vegetables and school breakfasts and lunches) as part of food relief more broadly.

In WA, the WA Council of Social Service (WACOSS) has developed the WA Food Relief Framework.⁴⁴ The framework provides the impetus to identify local government areas of particular concern and estimate the quantity and types of food needed for food relief.

Structural change at the system-level is required

Existing responses to food security in Australia have focused on a limited number of siloed solutions such as emergency food relief, community gardens, nutrition education, and cooking programs. Researchers conducted interviews in late 2022 and early 2023 with leaders of food initiatives in rural, regional and remote WA revealed that when asked about their perspectives on a food secure region they typically described existing and siloed solutions that, despite their widespread implementation, have been critiqued for their inability to adequately address the complexities of food security. The authors suggested that more time should be invested in enhancing community and interest holder understanding system-level structural actions that are effective.

This may be achieved by the creation of Food Policy Groups which include cross-sector food policy councils, coalitions, collaboratives, networks, partnerships, boards or steering committees.⁴² The cross-sector groups can include government, agriculture (i.e. food producers), social services, economic development, public health, hunger relief organisations and advocacy groups in identifying issues and facilitating effective solutions across the food system.

Scaling and expansion of existing programs

With funding through a National Food Security Plan, existing programs with large reach could be expanded. In WA, the school vegetable and fruit program Crunch&Sip© has recently celebrated its 20-year anniversary. ⁴⁶ Crunch&Sip© is a program where parents/carers provide fruit and/or vegetables for their child to take to school each day. Schools typically set a time during the day that children eat their fruit or vegetables together with water, known as a 'Crunch&Sip© break'. The program has reach across more than 560 primary schools in WA.⁴⁷ Expansion could include free provision of fruit and vegetables for all primary and secondary school students, especially for schools in lower income areas. International evidence suggests that providing free fruit and or vegetables (rather than parent pays and supplies model) can improve fruit and vegetable consumption⁴⁸, and support families with the cost of living. This aligns with broader evidence that shows that price and accessibility are the two major levers on population healthy eating behaviours.¹³

Monitor food stress at the national level and set measurable targets

National data on food security is poor and surveillance systems could be strengthened.⁴⁹ Food security reporting is irregular, with recent data releases in 2023⁵⁰ and 2011-12¹. A validated 18-item tool for surveillance of food security may be adopted for regular use into national surveillance systems (e.g., annual survey) which would provide robust and representative data to inform food security policy and evaluate the success of the proposed strategy.^{49,51} Such monitoring would also enable the setting of measurable targets for key food security outcomes. This would support the Sustainable Development Goal for food security targets and indicators, which Australia is signed up to.⁵² A food security strategy should outline targets for both hunger and nutrition quality, such as vegetable consumption.

Government purchasing power and local food production procurement policies

A new approach to procurement policies that support the development of local supply chains could be used for large government food supply contracts, such as federal government (e.g., through residential aged care) and state government (e.g., through hospitals and public schools) services.⁵³ The role of modifying procurement policies could be discussed in relation to building food security locally.

Consider protecting the right to food in Australian law

In 1976, Australia signed up to key international provisions for a right to food through Article 11 of the International Covenant on Economic, Social and Cultural Rights.⁵⁴ Article 11 stipulates that parties recognise the "right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing, housing, and to the continuous improvement of living conditions. The State Parties will take appropriate steps to ensure the realisation of this right."⁵⁴

This has not translated into domestic legislation recognising the right to food in Australia. Several examples of countries recognising in law the human right to food include Ecuador, Ireland, India, and others.^{55, 56} We encourage the strategy to consider outlining a pathway to protecting the right to food in Australian law as a key sustainability measure to ensure any changes to strategy funding or political support are shielded through a right to food.

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