Discussion paper – Feeding Australia: A National Food Security Strategy

Submission by Deakin University's Institute for Physical Activity and Nutrition and Institute for Health Transformation

IPAN
INSTITUTE FOR PHYSICAL ACTIVITY AND NUTRITION

INSTITUTE FOR HEALTH TRANSFORMATION

DEAKIN UNIVERSITY

Acknowledgement of Country

We acknowledge that the campuses of Deakin University reside on the traditional lands of the Wurundjeri, Boon Wurrung and Wadawurrung people of the Kulin Nation and the land of the Gunditjmara people. We pay our respects to their Elders past, present, and emerging.

Contact

Dr Christina Zorbas, Senior Research Fellow

c.zorbas@deakin.edu.au

This submission was prepared by Dr Christina Zorbas, Dr Rebecca Lindberg, Dr Erica Reeve, A/Prof Kristy Bolton, Prof Kathryn Backholer and Prof Mark Lawrence.

Deakin University's food security expertise

Deakin University is a recognised leader in food security and food policy research, particularly through its **Institute for Physical Activity and Nutrition** and the **Institute for Health Transformation**. Our researchers in these institutes conduct multidisciplinary, evidence-informed research to help address food insecurity across Australia, with a strong focus on policy development, public health, and community engagement.

Key areas of expertise include:

- **Policy innovation**: Our researchers are leading efforts to develop a comprehensive framework of public policy measures aimed at reducing food insecurity, including systematic reviews of effective interventions, real-world trials, and international comparisons.
- **Community-focused research**: Deakin researchers ensure lived experiences of food insecurity guide their research priorities, including working with priority groups such as families on low incomes, women, Aboriginal and Torres Strait Islander peoples, and migrant and refugee populations, to inform more equitable and culturally appropriate solutions.
- **Multidisciplinary research**: The Institute for Health Transformation integrates expertise from public health, nutrition, health equity, health economics and implementation science to support comprehensive evaluation of impactful food security strategies.

We recently hosted an Economic Food Policy Forum in partnership with Regen Melbourne and the Lord Mayor's Charitable Foundation. Speakers included Prof Shu Wen Ng (University of North Carolina), Dr Erica Reeve (Deakin University), Jacob Birch (Yaamarra and Yarral) and The Community Grocer (Georgia Savage and Roni Gomez). **Three key takeaways** were identified from the event that are relevant to our National Food Security Strategy:

(i) A National Food Security Strategy is needed and must support **a values-based food system that prioritises equity, health, and sustainability**, including by redirecting subsidies and resources toward small growers, Indigenous enterprises, and grassroots organisations.

(ii) A National Food Security Strategy should **integrate health, climate, economic, and social justice lenses and actors across these sectors—**recognising the need for stronger social security, health and environmental considerations—and **ensure the economics of food production serves communities** through initiatives like food subsidies, school meals, and small/medium food manufacturers, growers and businesses, and not just corporations.

(iii) Scaling successful pilots requires **long-term investment in place-based approaches and governance, including tailored approaches for priority populations** such as diverse First Nations, urban, and rural contexts.

Deakin University's submission to the Victorian Government's Inquiry into Food Insecurity (2024) can be found here.

Executive summary

The food system is failing most people who live in Australia. This is manifesting via a major food security crisis, whereby 1 in 8 Australian households are not able to consume sufficient nutritious food (1). A major opportunity exists for the Australian Government to pioneer a national strategy and implement policy actions that ensure **every Australian can enjoy access to healthy, affordable, culturally appropriate and sustainable foods**.

We commend the Australian Department of Agriculture, Fisheries and Forestry (DAFF) for preparing this discussion paper. We also welcome the opportunity for ongoing input and participation to ensure the recommendations and action that stem from this work are **evidence-based, effectively governed, and rigorously monitored and evaluated to ensure equitable impact** across communities in our nation. In particular, we welcome the alignment of a National Food Security Strategy with the Food and Agriculture Organization's (FAO's) definition and 6 dimensions (2). The inclusion of health, nutrition and First Nations communities is also pivotal.

To date Federal policy actions across the food system are typically geared towards commodity specific investments in agriculture, export-led development and economic prosperity. These investments **overwhelmingly promote the production and consumption of unhealthy foods and beverages** that can harm people and planetary health (3-5). Meanwhile local actions to address food insecurity focus on social services and health promotion efforts that make healthy food more accessible and affordable to priority populations, but they lack national coordination or scale.

The **disconnect between the responsibilities and responses of different government departments to food (in)security** may stem from the voices and interests of the commercial sector overshadowing those of community members (especially those with lived experiences of food insecurity) (5), environmental concerns, or productivity considerations for the long run.

We urge the Australian Government to ensure Feeding Australia: A National Food Security Strategy addresses the following **evidence-based recommendations in the medium-term**:

RECOMMENDATION 1: Clarify the purpose, nature and scope of the National Food Security Strategy

The scope and resulting actions of the National Food Security Strategy must be aligned with all of the FAO's dimensions of food security. In other words, the strategy should not be uni-dimensional and simply promote production and export-focused food systems. We also request clarity on the distinction between the Feeding Australia: A National Food Security Strategy and a National Food and Nutrition Policy. Given longstanding calls for a National Food and Nutrition Policy since 1995, we are concerned that this policy area has been deprioritised or replaced. However, the substantive food policy leadership at the national level right now means there is a major opportunity to serve Australia's interest in these aligned areas. A National Food Policy – which would include food security *and* food and nutrition objectives – could powerfully provide the structure to address cross-departmental coherence (e.g. co-led by DAFF, the Department of Health, Disability and Ageing, and the Department of Climate Change, Energy, the Environment and Water) and to deliver broad food system outcomes.

RECOMMENDATION 2: Fund real implementation

We strongly recommend that the government ensure the National Food Security Strategy is supported by adequate resources for equitable, effective and evidence-based implementation. We fully endorse the principle that *"an outcomes-based and practical strategy seeks to prioritise tangible impacts and real-world benefits that can be achieved by direct stakeholder action. It should not be a strategy for strategy's sake, or a document that sits untouched on a shelf. Implementation of the strategy and associated actions should recognise that responsibilities lie across governments, industry and community."* To deliver on this vision, substantial investment in on-the-ground initiatives, governance structures, and monitoring systems is essential. A

comprehensive implementation plan should be developed alongside and then finalised immediately following the final National Food Security Strategy, with clear accountabilities, timelines, and resourcing to ensure momentum and measurable impact.

RECOMMENDATION 3: Embed equity and the right to food

We recommend that equity, justice, food as a human right, and Indigenous food sovereignty be added as a core principle and acknowledged as a priority area within the strategy. Equity and justice are foundational to national food security, and we endorse the use of the FAO definition and its six dimensions, which strongly emphasises the need to ensure safe and equitable access to nutritious food **for all**. We also urge the strategy to strengthen its recognition of *food as a human right* (6) and to explicitly support *Indigenous food sovereignty* (7) as essential to achieving long-term, inclusive food security outcomes.

RECOMMENDATION 4: Nutrition security should be a priority action area

We recommend that the National Food Security Strategy elevate nutrition and health as 'whole of system' considerations and embed this as a central purpose across all subsequent policy action. Nutrition and supporting healthy diets are a core pillar in FAO's food security framework, yet nutrition and food security do not feature in the objectives of government strategies addressing the food system. The current focus on agricultural productivity will likely increase availability and reduce prices on a narrow range of commodities but encourages externalisation of costs to health and environments.

RECOMMENDATION 5: Redefine 'productivity' as a food systems priority area

We encourage the DAFF to adopt a broader definition of food system productivity, reflecting the Productivity Commission's recent recognition that *"productivity growth is not just about having more money... productivity growth can support broader social progress"*. There is already a concerning concentration of power to large or corporate agrifood sector (8). To achieve more **equitable, healthy and sustainable food production and economic growth** in Australia, benefits of productivity must be more fairly distributed, including to strengthen local food economies and First Nations food economies.

RECOMMENDATION 6: Redefine 'resilience' of supply chains

We recommend investing in place-based initiatives, local supply chains, and sustainable food businesses that empower communities and improve access to nutritious food. There is growing evidence on the potential of community-led models to reduce food insecurity and enhance dietary outcomes, while also supporting local economies and growers (9). Focusing on **preparedness and localised solutions** through security, sustainability, democracy, defence, risk management and infrastructure development will help build a more resilient food supply—as outlined in Professor Tim Lang's food resilience framework (10).

RECOMMENDATION 7: Strengthen environmental sustainability considerations

We recommend that the National Food Security Strategy broaden its sustainability and climate change scope to include actions that also address **five related threats to food systems**: loss of biodiversity and ecosystems, land use, freshwater systems changes, nutrient cycles affecting soil and water health, and chemical pollution—aligned with the planetary boundaries framework (11). The strategy could also include the following actions to promote food systems sustainability: mandate climate risk assessments, invest in localised, sustainable food initiatives and fully implement domestic sustainability standards (e.g. the Australian Agricultural Sustainability Framework). We also recommend the strategy show better alignment with international commitments such as the COP28 UAE Declaration on Sustainable Agriculture, Resilient Food Systems and Climate Action.

RECOMMENDATION 8: Whole-of-food system governance and leadership

We commend the government's early commitment to the National Food Security Strategy and the leadership shown by the DAFF. However, food security is a cross-cutting issue that requires coordinated action across multiple government departments. Different agencies approach food systems through varied lenses—ranging from trade and rural development to public health and social equity—making broader representation essential. We recommend formal engagement and resourcing of Departments such as Health, Disability and Ageing, Social Services, Treasury, Finance, and Climate Change, Energy, the Environment and Water to ensure **integrated policy development and implementation**. These departments play a critical role in enabling income supports, inclusive visa schemes, and public food procurement reforms. We also recommend strengthening vertical coherence across federal, state, and local governments to support dignified food access models, such as universal school meals and targeted subsidies for community-based food initiatives.

RECOMMENDATION 9: Include monitoring and accountability systems

We recommend that "monitoring and accountability" be added as a core whole-of-food-system consideration in the National Food Security Strategy. Firstly, robust investment in evaluation and data systems are essential for accountable policy implementation. It is important to understand which policies do/do not work and why this may be. Secondly, aligning with the strategy's outcomes-based principles, it is important to track the strategy's impacts and progress toward national food security. This should include routine measurement of best practice indicators related to food insecurity, diet quality, nutrition status, and diet affordability. Additionally, a comprehensive monitoring framework should be developed to assess environmental impacts of food systems, such as biodiversity loss, water use, nutrient cycles, and chemical pollution.

RECOMMENDATION 10: Inclusive representation in governance

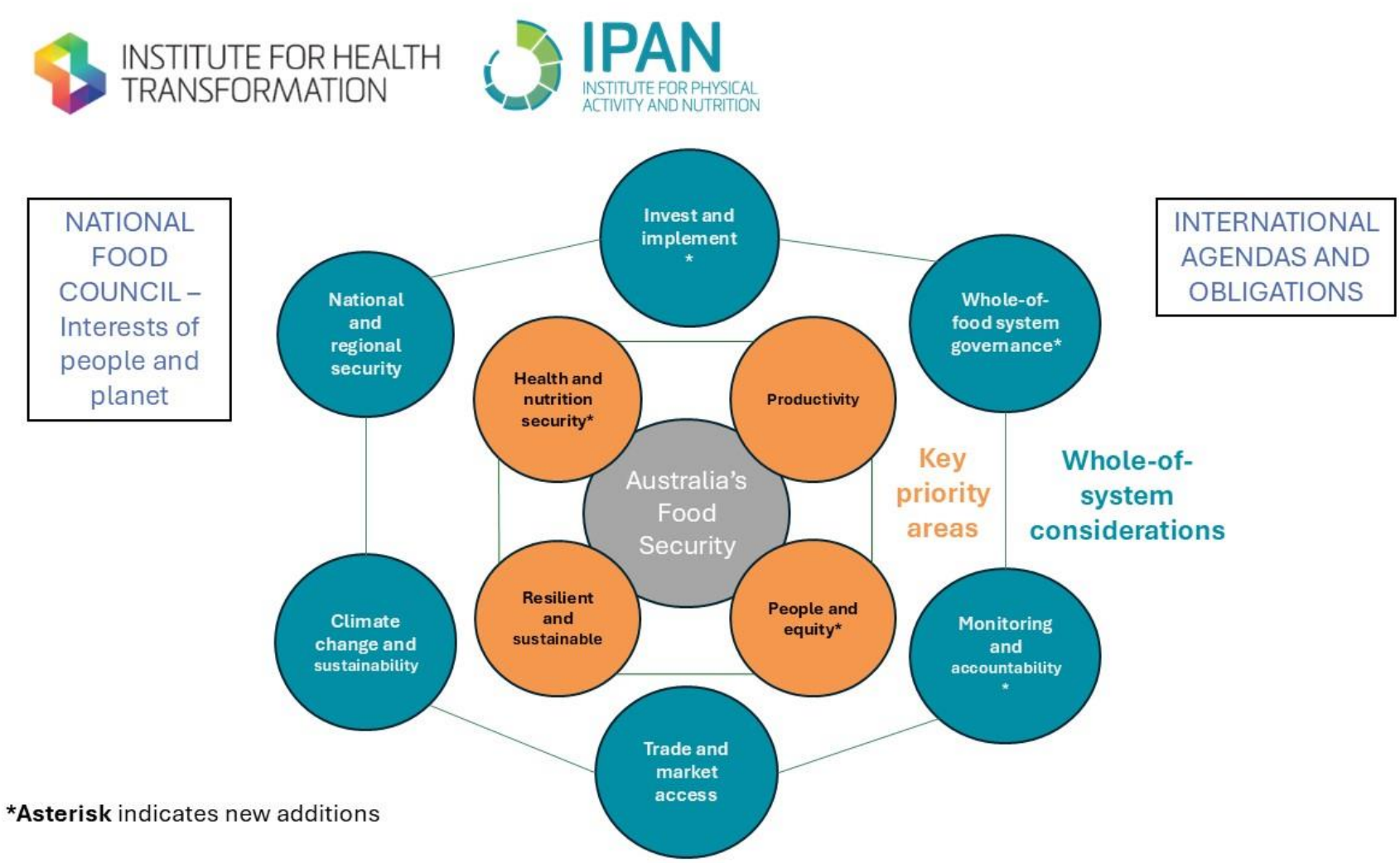
We recommend that the National Food Council adopt inclusive and participatory governance structures, with formal representation from community groups, civil society, social services, environmental and health organisations. While we acknowledge the importance of food production stakeholders, if the council is too weighted towards food industry stakeholders, we are concerned that critical perspectives related to health, equity, and sustainable food systems—essential pillars of food security—may be overlooked. To address this, we propose the establishment of a *Lived Experience Advisory Council* to provide ongoing input to the council and strategy. This body should include fairly compensated members with lived experience of food insecurity, including First Nations peoples, farmers, single parents, and those from regional and rural communities. Additionally, the National Food Council should report to Cabinet as a cross-portfolio body, not solely to the Minister for Agriculture, Fisheries and Forests, to ensure whole-of-food system governance.

RECOMMENDATION 11: Align with global frameworks

We recommend that the National Food Security Strategy be explicitly aligned with Australia's international obligations under the United Nations Climate Change Conference of Parties (COP) and the FAO. As a Member State, Australia has committed to advancing sustainable, resilient, and equitable food systems through global frameworks such as the COP28 UAE Declaration and the UN Committee on World Food Security. The strategy should reflect these commitments by integrating global best practices and working collaboratively across sectors to address food security comprehensively. Without this alignment, there is a risk that the strategy will reinforce the status quo of unsustainable and unhealthy food production, rather than driving the transformation needed to support the health, wellbeing, and productivity of all Australians.

The recommendations listed above are all within the purview of the Australian Government and call for the Department to work collectively with allies across sectors to ensure broad food security interests are comprehensively addressed. Without these changes, the strategy risks maintaining the status quo regarding unsustainable and unhealthy food production, rather than shifting to a thriving food system that serves the health, wellbeing and productivity of every Australian.

Figure 1. Summary of Deakin's recommendations to support a National Food Security Strategy



Detailed responses to discussion questions

Section 1 - Principles	
1) What other **principles** should government, industry and community prioritise to support the development of the strategy and why are these important?	We recommend **equity** be included as a key principle of the National Food Security Strategy. Equity is distinctly different from the other principles 'Whole of food system, collaborative, ambitious and forward-looking, and outcomes-based and practical'. It is tied to key concepts and actions related to First Nations food sovereignty, gender transformative approaches, culturally responsive approaches, all of which are key to achieving food security for everyone in Australia.
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?	The strategy should be **medium term**. This should include allocating sufficient resources over the next 5-10 years to sufficiently achieve clear objectives and actions that are outlined in the strategy. Implementation of actions (which is the focus of an ambitious National Food Security Strategy) cannot be fully achieved in the short term. Moreover, it is unlikely that a longer-term strategy (10-plus years) will hold relevance to the future Australian population. At this point in time, key priorities, actions and investments should be reviewed and a new 10-year strategy should be developed. Nonetheless, key implementation milestones must be made explicit within the strategy for the short, medium and long-term. The strategy should also be monitored and publicly reported against each of these milestones for transparency.
3) Are there examples of **current or planned initiatives** by you or your organisation to improve food security in your sector?	• **Developing evidence for the implementation of effective Food Voucher InitiaTives in AustraLia (FOOD VITAL).** National Health and Medical Research Council-funded project led by Dr Christina Zorbas, $689K, 2026-2028. This project has received full support of the Victorian Government's response to the Parliamentary Inquiry into Food Security in Victoria (12). • **Collaborative Food Security Solutions among Migrant Populations (CULTIVATE).** Discovery Early Career Research Award by the Australian Research Council led by Dr Christina Zorbas, $483K, 2025-2028 • **The "RISE study" - investigating Australia's policy Readiness to Invest in food Security in Early childhood**, led by Dr Rebecca Lindberg (2025-current) • **The evaluation of the VicHealth funded community Food Hubs across regional Victoria** (2023-2026), led by Dr Rebecca Lindberg • **Schools for Future Healthy Food Leaders** (pending), supporting healthy food supply in regional schools, led by Dr Cindy Needham • **Local level food security solutions among migrant and refugee communities in Victoria's Western Public Health Unit catchment area** (2026-2029), Dr Christina Zorbas and Kim McCormack – alongside **Food First in the West**, Western Public Health Unit, VicHealth Local Food Partnership grant (2025-2029) • **National actions to reduce food security among migrant and refugee communities** (2026-2029), PhD, Deborah Osborne • **African Youth Food Policy Study** (2024-current), co-developing African youth-led food security solutions, led by Dr Christina Zorbas

	• **Farm My School** (2022- current). A groundbreaking model of food education that transforms unused land into regenerative market farms within schools that feed, educate and connect communities. Board chair, Dr Erica Reeve • **It takes a Village** (2023-current), led by Associate Professor Kristy Bolton, evaluation of multi-faceted community-based program located in an area of high-deprivation and barriers to food security. $225K, funded by VicHealth. • **Food secure communities in South Australia: An evidence summary to support food security across food and social systems.** Led by Dr Rebecca Lindberg, https://doi.org/10.26187/0ax1-0740 • **Developing a healthy food policy approach** (phases 2, 2024 – 2025). Led by Associate Professor Kristy Bolton. $22K, City of Greater Geelong - D24-283445. • **Feed Me Right, Meli and Deakin University partnership for improving food security** (via food literacy) in young people living in emergency accommodation. Led by Associate Professor Kristy Bolton. Funded by The Collier Foundation and the Institute for Physical Activity and Nutrition. • **Food policies for Aboriginal and Torres Strait Islander health (FoodPATH)**, led by Dr Jennifer Browne and the Murnong Mob

Section 2. Priority areas	
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**?	We advise **two key additions to the priority action areas** that will enable the strategy to be genuinely '*ambitious and forward-looking' (principle 1.3)* by strengthening nutrition security and equity across Australia, rather than focusing predominantly on agricultural food production that is not currently nourishing people adequately or sustaining the planet. 1. **We recommend nutrition and healthy diets be made more central as a priority area.** The listed priority areas set the tone of the strategy which currently conveys a focus on increasing food system productivity as a solution to increasing food security. This is how the food systems works now, with actions geared towards promoting the production and consumption of unhealthy foods that can harm people and planetary health. Policy objectives in the Department of Agriculture seldom serve public health and nutrition objectives (13). Positioning nutrition and healthy diets as priority areas will break from 'business as usual', positioning these considerations as central to decision-making and aligning better with the FAO dimensions of food security. **We also recommend that improving access to the five core food groups outlined in the Australian Dietary Guidelines (14), be the core focus of the National Food Security Strategy.** These guidelines were prepared to reflect diets that are both healthy and sustainable. We further recommend that the strategy include actions to protect and promote breastfeeding, which is a major source of food security in early life. 2. Whilst we also acknowledge that 'People' have been included as a Whole-of-system consideration in the discussion paper, **equity and people-centred responses to food security should be a priority action area**. This could be included instead of the key priority on 'Competition and cost of living', which we do not think adequately captures the points made under this section in the draft discussion paper. We commend this section for focusing on

	addressing food security among priority populations (e.g. low income, single parent, remote households) and the statement that *"The government is taking action to address this power imbalance within the supermarket sector by agreeing in principle to all recommendations from the ACCC's supermarkets inquiry."* However, this key action area would be better summarised by more holistically addressing inequities in food systems and food access in Australia.
5) What **actions** could the strategy take to address challenges under each key priority area?	The National Food Security Strategy must both coordinate and strengthen existing efforts, while ensuring that any new actions are evidence-informed, cost-effective, and developed through meaningful consultation. The recommendations below reflect solutions well-established and frequently endorsed by the academic community.
	2.1 Resilient supply chains • Climate change is a major threat to Australian food systems resilience, with every 1°C increase in temperature increasing food insecurity by 2% globally (15). • **Food systems resilience requires preparedness and localised solutions** according to Professor Tim Lang from City University London's Centre for Food Policy. His model of food resilience includes food security, food sustainability, food democracy (i.e. moving beyond consumerism to foster active participation in food governance), food defence (protection from geopolitical disruptions), food risk management, and infrastructure development (16). • **Invest in place-based initiatives, local supply chains and sustainable business solutions.** Place-based and community-level food initiatives offer opportunities to improve food security and boost healthy diets (17). Initiatives such as community supported agriculture and food cooperatives can help to improve access to fresh produce and empower communities through education, participation and collaboration offering local employment opportunities and enhanced wellbeing. • We acknowledge the draft paper included reference to Dr Katherine Kent's evaluation of Boxy Divvy – a community co-op and family business that has been established in NSW and the ACT to connect communities with farmers and provide fresh and locally grown produce (including through shorter supply chains). This evaluation showed that the initiative reduced food insecurity among participants by 23% and increased fruit and vegetable consumption (17). This study adds to the decades of evidence and innovation (by small and medium enterprises, social enterprises and food disruptors) showing the potential and impact of food businesses that support short and resilient supply chains, consumers and growers (18). Box Divvy are currently expanding in Victoria and our team is in regular communication to support evaluation locally. • Australia must also **fully implement all international climate change commitments**, including all commitments made at the UN COP. For example the COP28 UAE Declaration on Sustainable Agriculture, Resilient Food Systems and Climate Action (19) was a world-first and clearly outlines key actions to reduce climate-related threats on agriculture, food systems and hunger and malnutrition globally. This includes:

	*"1. Pursue broad, transparent, and **inclusive engagement**, as appropriate within our national contexts, to integrate agriculture and food systems into National Adaptation Plans… before the convening of COP30.* *2. Revisit or orient policies and public support related to agriculture and food systems to promote activities **which increase incomes, reduce greenhouse gas emissions, and bolster resilience, productivity, livelihoods, nutrition, water efficiency and human, animal and ecosystem health** while reducing food loss and waste, and ecosystem loss and degradation.* *3. Continue to scale-up and enhance **access to all forms of finance** from the public, philanthropic and private sectors… to adapt and transform agriculture and food systems to respond to climate change.* *4. Accelerate and scale science and evidence-based innovations - including **local and indigenous knowledge** - which increase sustainable productivity and production of agriculture and related emerging domains, promote ecosystem resilience and improve livelihoods, including for rural communities, smallholders, family farmers and other producers.* *5. Strengthen the **rules-based, non-discriminatory, open, fair, inclusive, equitable and transparent multilateral trading system** with the World Trade Organization at its core."* • Finally, Australian farmers want the Australian Government to take stronger responsibility for climate action. This includes (1) via an *Integrated Climate Risk Assessment* where The National Food strategy must mandate climate risk assessment in all food, trade, and agriculture policies, ensuring climate considerations are mainstreamed rather than treated as separate issues, and (2) by moving *Beyond Voluntary Compliance to Sustainability Standards and including mandatory compliance* with emissions reduction and climate risk mitigation through the Australian Agricultural Sustainability Framework.
	2.2 <u>Productivity, innovation and economic growth</u> • We endorse strategies and actions that support more equitable, healthy and sustainable food production and economic growth in Australia. • We note the statement in the discussion paper that *"recent trends show a slowdown in productivity growth with implications for competitiveness"*. The recent report from the Productivity Commission (20) noted that: ***"productivity growth is not just about having more money and more stuff****…. productivity growth can support broader social progress by increasing the time, money and resources available to put towards things like healthcare, education and a social safety net. Where additional government spending is necessary to meet Australia's policy goals, in the long run the only way to pay for it is through increased growth: more GDP per hour worked in our market based sectors and more and better quality services per hour worked in our education and care sectors."* • The Productivity Commission's report further noted that that governments should prioritise the follow policy reforms to enhance productivity in Australia: (1) Promote economic dynamism and resilience through investment (i.e. diversify investments) (2) Find the lowest cost ways to meet the climate challenge (e.g. invest in cheaper, cleaner energy and net zero transformation) • **Redistribution of investment and benefits.** We also note that the government has recognised *"the value of exploring under recognised contributors to productivity growth, such as Indigenous-owned agribusinesses, which have grown at an average of 10% since 2012 (DAFF, ILSC & NFF 2024)."* It is essential that strategies to boost Australia's food security include working to **support Indigenous-owned food business that support growing traditional foods**

	and economic gains that are redistributed back into Indigenous communities (7). Jacob Birch recently completed a Churchill Fellowship and is researching Indigenous-led, circular food economies at the University of Queensland. His work with native grains and learnings from the Oneida Nation's white corn initiative shows how land access, capital, and governance can empower communities and revive ancestral food systems. He also highlighted the need to redirect funds from large corporations toward local food economies in Australia (7).

	2.3 <u>Competition and cost of living</u>
	• We suggest revising this key priority to 'Equity and people-centred' (details above).
	• **Increased government coherence in food security actions** at the local, state and national levels is necessary to achieve a food secure nation that puts people first.
	• At the **local and state levels** this should include investing in:
	  ○ More dignified emergency food access models (21).
	  ○ Trialling alternatives to current emergency food relief such as social enterprise markets and food voucher programs that are operated by The Community Grocer. Our team is leading the first robust evaluation of their voucher program, funded by the National Health and Medical Research Council (22). The Community Grocer's model shows how local food markets—serving over 14,000 customers across 6 sites in Victoria and doubling in number in recent years—can be vibrant, inclusive spaces. With over $130K in food vouchers distributed and a 70% redemption rate at these market sites which mix voucher and community customers, their model demonstrates how blended finance, food vouchers, and co-designed markets can improve food access and social connection (23).
	  ○ Strengthening connection between consumers and food sourced from social enterprises and small businesses where there is a greater distribution of benefit. Community-owned food businesses have been advocated for by First Nations peoples and African Australian communities in our research (24).
	• At the **national level**, we urgently call upon the government to invest in the following actions in a National Food Security Strategy:
	  ○ Increase income supports such as Jobseeker as per ongoing recommendations by the Australian Council of Social Services. Insufficient income to meet basic living expenses, including housing and food, are the biggest driver of food insecurity in Australia (25).
	  ○ Ensure visa schemes include sufficient access to resources such as income, employment, education and healthcare opportunities so that migrants and refugees can afford basic living expenses in Australia.
	  ○ **A powerful but overlooked opportunity to promote food insecurity (with dignity) is the provision of a Universal School Meals Program**. Australia is one of the only high-income countries around the world that does not offer children a nutritious meal at school. Providing children with a lunch meal can improve nutrition and promote healthy environments and skills for school-aged children (26). It can also create market and financial opportunities for local producers as shown by VicHealth commissioned research (26). Evidence is mounting on impacts of Universal School Meals on dietary intake and preferencing, food insecurity, and academic performance of students (27).

	○ The Australian Government already heavily subsidise agricultural export production and subsidies can be repurposed to strengthen health, equity and sustainability in our food systems. Investment in a universal school meal program can help address food insecurity and healthy and sustainable food systems. A meals program can be designed to promote equitable local and rural livelihoods opportunities (as has been done in the US) (27). ○ The National Food Security Strategy should also focus on redirecting public procurement from concentrated retail chains towards regional and local producers to further support the livelihoods of growers and ensure food affordability. • We also advocate for governments to **fully support the 10 recommendations put forward in the FoodPATH Policy Statement** (prepared by the Victorian Aboriginal Community Controlled Health Organisation and Deakin University) to support Aboriginal and Torres Strait Islander food sovereignty. This includes community-led and ACCO-led programs such as community gardens, food sharing, yarning circles to support education, and early years and school food programs.

Section 3 – Whole of system considerations	
1) 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**?	• We recommend that the National Food Security Strategy **broaden its sustainability and climate change scope** to include actions that also address five related threats to food systems: loss of biodiversity and ecosystems, land use, freshwater systems changes, nutrient cycles affecting soil and water health, and chemical pollution—aligned with the planetary boundaries framework (11).
	• **Cross-government action:** We commend the government for their commitment to the plan early in their second term and for the Department's leadership. Other Departments are vital to the Plan's success. Our recommendation is to ensure the National Food Security Strategy is a success by including representation from cross-cutting government departments such as the Department of Health and Aged Care, Department of Social Services, Treasury & Department of Finance, and Department of Climate Change, Energy, the Environment and Water. There is extensive literature on how different agencies view the role of food systems (28). Some government institutions view the food system as an opportunity to build export-led development. For others the food system is important for livelihood and rural development. For others it is about supporting the Australian population with sufficient healthy diets to prevent poor health.
	• **Whole-of-food-system "governance" and more participatory forms of governance need to be included as a whole of food system consideration.** We are concerned that the National Food Council (the council) may be weighted towards representation of stakeholders who can speak to food but not healthy, equitable and sustainable food systems. We recommend that the National Food Council include as many places as possible to ensure representation from community, civil society, social services, environment and health organisations to mitigate the major risk of failing to include these interests in decision making (29). • **Community members with lived experience of food insecurity** and other priority communities such as farmers, First Nations communities, single parents, and regional and rural communities, should be included as **an**

	advisory council on the National Food Security Strategy. Their time and expertise should be recognised and compensated adequately for their contributions (29). • Given this, we recommend this council be positioned outside of the DAFF and within a broader framework of food systems interests that has food security – as defined by the FAO – at its core.
	• **We suggest adding "Governance" and "Monitoring and accountability" as whole-of-system considerations.** • Our international research has shown that robust data, monitoring and evaluation of policies are key to support accountability for effective policy implementation (30). Better food security data systems are key to create awareness, strengthen coherence and capacities, promote transparency and accountability, promote equity and inclusion across sectors. We urge this to be added as a key whole of system consideration that enables Australia to track our progress towards being a food secure nation and track the impacts of our National Food Security Strategy. This also clearly aligns with the key strategic principle to be 'Outcomes-based and practical'. Harnessing data and digital technology is also a key focus of the recent Productivity Commission report "Growth mindset: how to boost Australia's productivity". Data governance should also be inclusive and aligned with global standards. • Data monitoring should also include **globally standardised food security indicators as well as those concerning population diet quality, nutrition status, and diet affordability (31)**. Such data monitoring should be established and led by ABS/AIHW to measure food insecurity, diet quality, affordability, and access, disaggregated by population group and geography. The Australian Government should also set targets to reach zero hunger and food insecurity among First Nations, low-income, student and regional households (aligning with the Global Sustainable Development Goals). • Data and monitoring systems should enable evaluation of policy options to understand which policies do/do not work and why this may be.
2) What **actions** could the strategy take to address challenges under these whole-of-system considerations?	**3.1 <u>Climate change and sustainability</u>** • To mitigate issues related to loss of biodiversity and ecosystems, land use, freshwater systems changes, nutrient cycles affecting soil and water health, and chemical pollution—the FAO recommendations include but are not limited to (32): ○ Holistic food systems approaches that promote health, sustainability and equity ○ Agroecological, regenerative and circular food systems ○ Restoring biodiversity and mainstreaming biodiversity consideration sin national policies ○ Climate smart agriculture ○ Community-led adaptations ○ First Nations food systems and food sovereignty ○ Inclusive and participatory governance of food systems ○ Invest in rural infrastructure and livelihood diversification to support the resilience and sustainable practices of agrifood communities • **Implement global UN COP agreements that Australia is a signatory of.** This includes the **COP28 UAE Declaration** on Sustainable Agriculture,

	Resilient Food Systems and Climate Action (19)– a world-first and clearly outlines key actions to reduce climate-related threats on agriculture, food systems and hunger and malnutrition globally. • **Environment-related risk monitoring and management** should also be integrated into the National Food Security Strategy and policies should reflect the true ecological costs of food production.
	3.2 People • **People should be a key priority of Australian food systems** and policies should include investments to support: o Youth engagement and employment o Gender equality and women's and girls' empowerment o First Nations food sovereignty o Addressing income inequality and poverty o Migrant and refugee communities o Regional and remote communities o People with disabilities o Single parent households
	3.3. Health and nutrition • **This should be a key priority area (see earlier responses)**.
	3.4 Trade and market access Align with recommendations in the **Committee on World Food Security's** "Connecting Smallholders to Markets (2016)" recommendations. In sum, this includes (i) supporting local food markets, (ii) helping small farmers—especially young people and regional farmers—to access resources, (iii) use good data to guide decisions and make sure farmers have a say in shaping food policies, and (iv) grow a variety of nutritious foods.
	3.5 National and regional food security • Adhere to agreements made at the World Trade organization ministerial conferences. • Ensure Official Development Assistance targets are met to support our neighbouring Pacific Islands and States to achieve food security.

References

1. ABS, National Nutrition and Physical Activity Survey (NNPAS), 2025, Canberra, Aus. Available at: https://www.abs.gov.au/statistics/health/food-and-nutrition/food-insecurity/latest-release
2. HLPE (2020) Food Security and Nutrition: Building a Global Narrative Towards 2030. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security. Rome, Italy: FAO.
3. Smith, K., Bellotti, W., Davey, T., Dean, J., Durham, J., Ferguson, M., Muriuki, G., Oliver, G., Schubert, L., & Xu, H. (2017). Food system governance in Australia: Co-creating the recipe for change. Global Change Institute, The University of Queensland.
4. De Schutter O, Jacobs N, Clément C. A 'Common Food Policy' for Europe: How governance reforms can spark a shift to healthy diets and sustainable food systems. Food Policy. 2020;96:101849.
5. Díaz-Méndez C, Lozano-Cabedo C. Food governance and healthy diet an analysis of the conflicting relationships among the actors of the agri-food system. Trends in Food Science & Technology. 2020;105:449-53.
6. Rebecca L, Liza B, Stephanie G. A rights-based approach to food security in Australia. Health Promotion Journal of Australia.
7. Birch JCFtcwFNPoNAtlftewMWCTAfhw.
8. Díaz-Méndez C, Lozano-Cabedo C. Food governance and healthy diet an analysis of the conflicting relationships among the actors of the agri-food system. Trends in Food Science & Technology. 2020;105:449-53.
9. Kent K, Brooks C, Attuquayefio T, Ewald A, Morrison N, Alhassani G, et al. Participation in a community-based food cooperative impacts self-reported food security status and dietary intake in Australian adults. Appetite. 2025;212:108030.
10. Lang, T. Reshaping food systems: the urgent call for resilience and democracy. Insights from Professor Timothy Lang, Emeritus Professor of Food Policy at City University London's Centre for Food Policy. March 17 2025. Available from: https://feast2030.eu/reshaping-food-systems.
11. Richardson K, Steffen W, Lucht W, Bendtsen J, Cornell SE, Donges JF, et al. Earth beyond six of nine planetary boundaries. Science Advances. 2023;9(37):eadh2458.
12. Victorian Government. (2025). Response to the Parliamentary Inquiry into Food Security in Victoria. Department of Families, Fairness and Housing. Authorised and published by the Victorian Government, 1 Treasury Place, Melbourne. ISBN: 978-1-76130-862-8. Available at: Parliament of Victoria – Tabled Documents Database.
13. Goessler, C, Jarrett, L, Liu, M, McClure, E, Sperling, F, Thomas, F, & Wynn, K 2023, Reshaping Australian Food Systems – A Roadmap towards a more sustainable, productive and resilient future for Australia's food, its environment and people, CSIRO, Canberra, accessed 25 June 2025.
14. National Health and Medical Research Council. (2013). Australian dietary guidelines. Australian Government Department of Health and Ageing. https://www.health.gov.au/resources/publications/the-australian-dietary-guidelines.
15. Dasgupta S, Robinson EJZ. Attributing changes in food insecurity to a changing climate. Scientific Reports. 2022;12(1):4709.
16. Lang, T. Reshaping food systems: the urgent call for resilience and democracy. Insights from Professor Timothy Lang, Emeritus Professor of Food Policy at City University London's Centre for Food Policy. March 17 2025. Available from: https://feast2030.eu/reshaping-food-systems.
17. Kent K, Brooks C, Attuquayefio T, Ewald A, Morrison N, Alhassani G, et al. Participation in a community-based food cooperative impacts self-reported food security status and dietary intake in Australian adults. Appetite. 2025;212:108030.
18. Lindberg R, McCartan J, Stone A, Gale A, Mika A, Nguyen M, et al. The impact of social enterprise on food insecurity – An Australian case study. Health & Social Care in the Community. 2019;27(4):e355-e66.
19. COP28 UAE Declaration on Sustainable Agriculture, Resilient Food Systems, and Climate Action. COP28. 2023. Available from: https://www.cop28.com/en/food-and-agriculture.

20. Productivity Commission 2025, Growth mindset: how to boost Australia's productivity, 5 productivity inquiries, Canberra, July. Available from: https://www.pc.gov.au/inquiries/current/five-productivity-inquiries/growth-mindset.pdf.
21. University of Melbourne. Foodprint Melbourne. Food with dignity. Available from: https://science.unimelb.edu.au/foodprint-melbourne/toolkit/food-with-dignity.
22. The Community Grocer: Grocer Gift Pay it Forward. 2024. Available from: https://www.thecommunitygrocer.com.au/grocer-gift-pay-it-forward.
23. Duong-Nguyen A, Ko C, Mehta M, Savage G, Kleve S. The Community Grocer Gift Evaluation. 2023. Monash University & The Community Grocer. .
24. Braniff P. Young African Australians lead advocacy for affordable food [media release]. Institute for Health Transformation, Deakin University. 2024. Available from: https://iht.deakin.edu.au/2024/03/african-youth-food-policy-study/.
25. Foodbank Hunger Report 2024. Ipsos Public Affairs. Available from: https://reports.foodbank.org.au/wp-content/uploads/2024/10/2024_Foodbank_Hunger_Report_IPSOS-Report.pdf.
26. Esdaile EK and Gallegos D (2024). Policy Mapping Report: School Provided Meals in Victoria. Prepared at the Centre for Childhood Nutrition Research, Queensland University of Technology on behalf of Victorian Health Promotion Foundation, Melbourne.
27. Cohen JFW, Hecht AA, McLoughlin GM, Turner L, Schwartz MB. Universal School Meals and Associations with Student Participation, Attendance, Academic Performance, Diet Quality, Food Security, and Body Mass Index: A Systematic Review. Nutrients. 2021;13(3):911.
28. Parsons, K., & Hawkes, C. (2019). Policy Coherence in Food Systems. Centre for Food Policy, City University, London.
29. Venegas Hargous C, Kapeke K, Backholer K, Jeyapalan D, Nunez V, Browne J, et al. Equalising power imbalances or a trail of broken promises? A qualitative study on engaging people with diverse lived experience of marginalisation in food policymaking in Australia. BMC public health. 2025;25(1):613.
30. Zorbas, Christina; Resnick, Danielle; Jones, Eleanor; Suri, Shoba; Iruhiriye, Elyse; Headey, Derek D.; Martin, Will; et al. 2024. From promises to action: Analyzing global commitments on food security and diets since 2015. IFPRI Discussion Paper 2238. Washington, DC: International Food Policy Research Institute. https://hdl.handle.net/10568/138946.
31. Kleve, S, Kent, K, and Lindberg R. Two minutes is all it takes: measuring food security in Australia. 2024. Available from: https://thepolicymaker.appi.org.au/two-minutes-is-all-it-takes-measuring-food-security-in-australia/
32. High Level Panel of Experts on Food Security and Nutrition (HLPE-FSN). (2025). Building resilient food systems. Rome: Food and Agriculture Organization of the United Nations. https://www.fao.org/cfs/cfs-hlpe/publications/hlpe-20.

Key resources from the Committee on World Food Security

Equitable, healthy and sustainable foods systems -

- **Global Strategic Framework for Food Security and Nutrition**. *Committee on World Food Security (2021). This calls for:*
    - **i.** A twin-track approach: combining direct assistance and long-term development.
    - **ii.** Investment in smallholders and responsible agricultural investment.
    - **iii.** Gender equality, social protection, and climate resilience.
    - **iv.** Food systems transformation, tenure rights, and nutrition-sensitive agriculture.
    - **v.** Reducing food loss and waste, biofuels, water, and livestock roles
    - **vi.** Emphasizes multi-level coordination (country, regional, global).
    - **vii.** Encourages resource mobilisation, policy alignment, and monitoring progress.
    - **viii.** Promotes inclusive participation of stakeholders, including civil society and the private sector.
- **Sustainable agricultural development** for food security and nutrition: what roles for livestock? *Committee on World Food Security (2016)*
- **Agroecological and other innovative approaches for sustainable agriculture** and food systems that enhance food security and nutrition. *Committee on World Food Security (2021 Policy recommendation)*

People -

- Promoting **Youth Engagement and Employment** in Agriculture and Food Systems for Food Security and Nutrition *(2022 Committee on World Food Security Policy recommendation)*
- Voluntary Guidelines on **Gender Equality and Women's and Girls' Empowerment** in the Context of Food Security and Nutrition *(2023 Committee on World Food Security)*

Trade and market access -

- "Connecting **Smallholders** to Markets (2016)" recommendations, *Committee on World Food Security*

Data and monitoring -

- Strengthening Collection and Use of **Food Security and Nutrition (FSN) Data** *(2023 Committee on World Food Security Policy recommendation)*