



Question on Notice: Response

Legislative Council Legal and Social Issues Committee
Inquiry into food security in Victoria

11 September 2024

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Background

Sustain: The Australian Food Network was invited to give evidence on 21 August 2024 to members of the Legislative Council Legal and Social Issues Committee Inquiry into food security in Victoria. The issue of anti-competitive practices of the supermarket duopoly including price gouging and land banking was raised Drs Nick Rose and Kelly Donati.

Sustain’s recommendation to create a Victorian Food Security and Food Systems Fund via hypothecated taxation on the supermarket duopoly either through a proposed ‘Vacant Commercial Land Tax’ (extending the existing Vacant Residential Land Tax) and / or an extension of the payroll tax surcharge (currently raising over \$1 billion per annum for the Mental Health and Wellbeing Levy) was discussed. The Committee’s Deputy Chair Ryan Batchelor MP requested further evidence and insights about the extent of the problem and opportunities to address it.

Understanding the dimensions of food security

We preface our response by reference to the definition of food security, as the foundation to guide the Victorian government’s response to this urgent social issue. The six pillars of food security outlined below are of direct relevance to our discussion of supermarket land-backing and its implications for food system resilience and access to healthy and culturally diverse which we discuss below. In particular, the dimension of “stability” speaks to the need for a food system that can withstand shocks and the importance of protecting is as critical infrastructure.

THE SIX DIMENSIONS OF FOOD SECURITY	
Availability	Having a quantity and quality of food sufficient to satisfy the dietary needs of individuals, free from adverse substances and acceptable within a given culture, supplied through domestic production or imports.
Access (economic, social and physical)	Having personal or household financial means to acquire food for an adequate diet at a level to ensure that satisfaction of other basic needs are not threatened or compromised; and that adequate food is accessible to everyone, including vulnerable individuals and groups.
Utilization	Having an adequate diet, clean water, sanitation and health care to reach a state of nutritional well-being where all physiological needs are met.
Stability	Having the ability to ensure food security in the event of sudden shocks (e.g. an economic, health, conflict or climatic crisis) or cyclical events (e.g. seasonal food insecurity).
Agency	Individuals or groups having the capacity to act independently to make choices about what they eat, the foods they produce, how that food is produced, processed, and distributed, and to engage in policy processes that shape food systems. The protection of agency requires socio-political systems that uphold governance structures that enable the achievement of FSN for all.
Sustainability	Food system practices that contribute to long-term regeneration of natural, social and economic systems, ensuring the food needs of the present generations are met without compromising the food needs of future generations.

Source: Food security and nutrition: building a global narrative towards 2030 (HLPE 2020)

Food insecurity is defined as “the limited or uncertain availability of nutritionally adequate or safe foods or limited or uncertain ability to acquire foods **in socially acceptable ways**.”¹ This definition reveals the layered complexity of food insecurity. Food may be available but not culturally appropriate (e.g. halal, kosher, vegan, etc) or is culturally homogenous. Food may be accessible but nutritionally inadequate or unhealthy. Food relief recipients may have limited agency or choice in food on offer because services have not been co-designed with users. Frontline food relief providers may also have limited choice themselves in food donated to them and/or lack resources to provide culturally appropriate foods or offer choices.

Food relief is a lifeline that temporarily relieves the threat of hunger. This means, by definition, that food relief programs do not bring about community food security in itself.

Questions

The specific questions are highlighted in the exchange below:

Ryan BATCHELOR: I would be really interested in both **the extent of the issue – how many communities we think this is occurring in, the extent of the site holdings that are owned by these types of commercial entities, zoned in this particular way, designed for that particular retailing purpose** – but also **how long we understand that this is occurring for**, because obviously we have got general issues across the board about the time it takes for developers to bring housing onto the market. We have got a housing crisis; we are trying to incentivise people to do more construction so that people have got places to live. So the whole thing we are trying to push along –

Nick ROSE: Yes, we are happy to take that on notice.

Ryan BATCHELOR: and **if we can get some understanding about other ways we can incentivise it plus build an income stream**, I think that would be really helpful.

Response to Questions

Supermarket land banking

In the recent report of the Senate Select Committee Inquiry into Supermarket Pricing, the Committee adopted the Australian Securities and Investments Commission definition of land-banking as ‘a real estate investment scheme that involves buying large blocks of undeveloped land.’ Sustain consulted several planning academics and expert practitioners in responding to the Deputy Chair’s question. None were able to provide clear answers about the extent of land-

¹ Pollard, C. M., & Booth, S. (2019). Food insecurity and hunger in rich countries—it is time for action against inequality. *International Journal of Environmental Research and Public Health*, 16(10), 1804.

banking in Victoria nor for how long it has been going on. One remarked that, to answer this question properly, you 'would need access to comprehensive property data and a forensic accountant'. The unanimous conclusion was that there is insufficient monitoring and oversight of the problem to quantify the issue, but that it is a well-established problem. By way of example, we offer a case study (below) that was well-publicised at the time and involved intervention from the then Planning Minister Matthew Guy.²

Land-banking case study – Mernda

In 2014, Woolworths (Fabcot) purchased a planning-scheme-designated retail site in Mernda to provide retail, community infrastructure and pedestrian access and activation to the Mernda Train Station. The "main street retail" site remained an empty paddock for some time while the Mernda community established around it without a local grocery retailer. Coles sought to establish on the opposite corner (not in accordance with the strategic documents in the planning scheme). Council approved the Coles supermarket against its own strategic planning framework because it would deliver the community a place to shop locally for food. The VCAT reviewed the decision and determined Coles could not build their supermarket in that location. The appellant was Fabcot (Woolworths). Minister for Planning Matthew Guy intervened, changing the planning scheme so that the Coles supermarket could proceed. Today, both supermarkets have established on their respective sites, though Woolworths did not open until 2022. However, a lack of "critical weight" provided by services and retail meant to support high-density housing in the town centre means that the main street retail in the Woolworths shopping centre site still ends in a paddock.

One of Victoria's leading planning experts made the following observation about the impacts of the relentless growth of the supermarket sector in Victoria and elsewhere over many decades:

On broader land use planning rules, supermarkets have been progressively able to control the food retailing markets because governments have allowed them to greatly broaden their businesses. The need for governments forcing divestment would be reduced if governments regulated to prohibit [the supermarket duopoly] from selling certain items - particularly vegetables, fruit, meat, fish, bread and alcohol, even newspapers. The loss of shops in main streets which traditionally sold such items is a huge loss of amenity, ultimately helping to make traditional shopping centres ghost towns. [In Tasmania] supermarket chains are not allowed to sell alcohol. Governments could easily use planning rules to broaden choice and increase quality of food products this way.³

It is only in relatively recent history that supermarkets have sold fresh produce, bakery products, meat, fish and alcohol.

² <https://www.theage.com.au/national/victoria/planning-minister-seeks-to-break-deadlock-in-coles-and-woolworths-supermarket-stoush-20140715-zt7nm.html>

³ Personal communication with Sustain

As the evidence given by Grant Ramage (Metcash) to the Senate Select Committee Inquiry on Supermarket Prices makes clear, the extent and impacts of land-banking by the supermarket duopoly 'flies under the radar' because there are no requirements to report it to the Australian Competition and Consumer Commission (ACCC) or to any other regulatory body (Federal or State). This is reflective of the point we made in our submission and evidence to the Legal and Social Issues Committee, namely that federal and state governments have taken a *laissez-faire* approach to food systems and food security over many decades, the result being that the most economically powerful actors have risen to the point of over-bearing dominance across the system with well-documented deleterious impacts for both suppliers (farmers especially) and consumers. Sustain concurs with the authors of "Regulating Supermarkets: The Competition for Space" who wrote: "Competition policy continues to insist that we shall be better off if public regulation defers to the market and private regulation... More holistic regulation is needed, not less, if food outlets are to be diverse and amenable... Private regulation by the [supermarket duopoly] has become a key driver of... land-use configuration and social space allocation. The biggest reform priority therefore should not be to roll back public regulation but to seek regulatory measures that engage and moderate the strategies of the [duopoly]."⁴

The Senate Select committee found that supermarkets reduce competition, particularly in greenfield sites where new suburbs are being developed.⁵ It also heard evidence about the extent of land-banking by the supermarket duopoly as well as how long it had been going on, noting that: "Coles holds around 50 development sites, some acquired up to 20 years ago, while Woolworths holds around 60 development sites, some of which were acquired nearly 30 years ago. Between the two retailers, these are significant land holdings."⁶ Related to land-banking is the practice of 'creeping acquisitions' or mergers. Approximately one-third to one-fifth of the 1000-1500 mergers that take place in Australia each year are referred to the ACCC under "the current voluntary merger regime."⁷ The Senate Select Committee on Supermarket Prices commented:

The fact that so few mergers are subject to compulsory oversight and scrutiny is alarming, and in the context of supermarkets, does nothing to prevent the duopoly of increasing its market share without proper investigation and oversight...The current framework is clearly not working in the interests of the Australian public or economy...The steady acquisition of smaller food and grocery retailers by Coles and Woolworths is significantly dampening competition in an already highly-concentrated market. Alongside divestiture powers, merger reform will play a vital role in promoting a more competitive and diverse supermarket sector.⁸

⁴ Arup, C., Beaton-Wells, C., & Paul-Taylor, J. (2017). Regulating supermarkets: The competition for space. *UNSWLJ*, 40, 1035.

⁵ [https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Supermarket_Prices/SupermarketPrices/Report_Final_report_-_Parliament_of_Australia_\(aph.gov.au\)](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Supermarket_Prices/SupermarketPrices/Report_Final_report_-_Parliament_of_Australia_(aph.gov.au))

⁶ Senate Select Committee Report, para 9.67

⁷ Senate Select Committee on Supermarket Prices report, para 9.60

⁸ Senate Select Committee on Supermarket Prices report, paras 9.60-9.61

Most notably, the Committee heard evidence from the Chief Executive of rival supermarket business Metcash, Grant Ramage, who described the following practices including land-banking through which supermarkets use their power to influence planning processes in their favour:

*“Firstly, the chains try and **buy successful independent stores**. That **removes critical scale** from our network. They're often prepared to **pay significantly inflated prices**, far more than any other independent would ever afford to pay. If they can't buy the store, they try and buy the property. We have good examples where they then **turf out the independent at the end of a lease**, even when they already own multiple stores in that locality. If they can't buy the property, then they **apply for special treatment for spot rezoning**, which is when they take planning rules that apply to everybody else and that everybody else abides by and say: 'That doesn't suit us. We have a different site that we'd like to be zoned for a supermarket.' The problem with that is that it really **undermines planning in town centres**. It **distorts traffic flows** and **damages local businesses**. And, by land banking and **tying up viable sites for supermarkets**, they're successfully projecting this behaviour into the future and **protecting themselves from real competition in the future.**”*

Although the supermarket duopoly denies claims of land-banking, the Committee came to a different conclusion: “Despite their suggestions to the contrary, it appears to the committee that land banking practices are being used by supermarkets as means to reduce competition, particularly in greenfield sites.”⁹

In sum, supermarket land-banking is a complex and consequential phenomenon, with very little government oversight or monitoring of the practice and poor understanding of the implications for neighbourhood character, economic diversity, farmer viability, food system resilience or health.

Implications and further considerations

The practices of land banking and creeping acquisitions are consequential because of the ways in which they stifle competition from smaller independent food retailers and greengrocers. This lack of competition has several implications for food security:

- 1) **Health and nutrition:** The majority of unhealthy and ultra-processed foods are purchased in supermarkets. According to the George Institute State of the Food Supply Report (2021), 50% of products sold in supermarkets are considered discretionary products. Only 12% of products are fruits, vegetables, nuts and legumes, and 71.9% are classified as ultra-processed.

Yet supermarkets are assumed to be as “healthy food outlets” in municipal health and wellbeing planning processes, and they are the default anchor retailer in neighbourhood precinct planning and liveability indicators.

⁹ Senate Select Committee Report, para 9.66

- 2) **Affordability:** Although the supermarket duopoly market themselves as the most affordable food option, this is not the case. In Sustain's analysis of food affordability in inner metropolitan Melbourne, municipal markets are, by far, the most affordable option for fresh produce with cultural grocers often also being more affordable. Depending on the neighbourhood, greengrocers were also an affordable option. Municipal markets, cultural grocers and greengrocers create more economic diversity and therefore enhance neighbourhood character.

The cost-of-living crisis has seen growing numbers of Australians experiencing food insecurity for the first time. Yet the supermarket duopoly has posted record profits. Other inquiries have detailed practices of price gouging, demonstrating that the supermarkets first priority is their obligations to shareholders and not Australian communities.

- 3) **Culturally appropriate food:** Access to culturally appropriate foods is important dimension of food security, particularly for new migrants. The supermarket duopoly is a poor option for culturally diverse fresh produce. The centralised supply chains of the duopoly means that most supermarkets sell a standard range of produce that does not reflect the cultural diversity of the Victorian community.

4) **Food system resilience (supply)**

- a. **Supply chains:** A further dimension of food security is the resilience of the food system itself. The disruptions of the COVID-19 pandemic revealed the vulnerabilities of the food system. Many Australians were seeing empty supermarket shelves for the first time. Supply chain disruptions required many of the major supermarkets to ration certain items, and many standard offerings were out of stock. This is because centralised supply chains are less agile and able to respond to shocks to the system. They were also frequent sites of Covid transmission.

Municipal markets, greengrocers and other independent food retailers did not face these challenges, with most having little to no supply chain disruption. Yet the major supermarkets were prioritised over municipal markets and greengrocers during the pandemic. In 2021, the Rules of *Security of Critical Infrastructure Act 2018* were amended to include food and grocery outlets as critical infrastructure assets, naming the following specific corporations: Woolworth Group, Coles Group, Aldi and Metcash.¹⁰ The *SOCI Act* further entrenches the supermarket duopoly and other major players within emergency responses to protect the food system and excludes smaller players that proved more resilient during the pandemic.

¹⁰ While we take issue with the privileging of the supermarket duopoly in this context, we acknowledge the important role of Metcash in supporting independent retailers, the wholesale market sector and smaller producers and manufacturers.

- b. Farmer viability:** There is ample evidence that the supermarket duopoly has an outsized influence on the farming sector. The duopoly determines not only what is produced and how it is packaged, but also sets prices and aesthetic standards that have profound consequences for farmer profitability. Sustain has held workshops with market gardeners in South Werribee who have stated that the prices they receive for their produce has not gone up since 1987, while input costs have gone up astronomically over that period. Farmers and supermarkets operate on an increasingly uneven playing field that presents a threat to the future viability of Victorian agriculture and therefore to the resilience of the food system itself.

Similarly, the Inquiry into supermarket prices arrived at similar findings in their report: “The committee heard from some farmers and other suppliers who struggle to make ends meet when they haven’t been given a price increase in 15 years. We heard that farmers fear retribution for trying to negotiate on a level playing field. The committee heard again and again of the numbers of smaller farmers who are leaving the industry, saying ‘there are easier ways to lose money’. **Not only does this impact those individual farming families, but it also puts Australia’s food security at risk.**”

We urge the Legal and Social Issues Committee (VLC) in this Inquiry to highlight the supermarket duopoly’s anti-competitive practices and their negative impacts on suppliers, consumers and the broader Victorian food system, as we and others have documented. The case for constraining supermarket power is now overwhelming, and the Senate Select Committee Inquiry into Supermarket Powers reached that conclusion, as seen by its substantive recommendations for reform, up to and including divestiture.

We reiterate that existing Federal competition policy and law (as noted above) and the Victorian government’s existing planning framework have enabled the expansion of the supermarket duopoly in both brownfield and greenfield sites for many years. The combined effect of the current legal and policy frameworks is that they enable land-banking and fail to constrain other anti-competitive practices such as creeping acquisitions. Victoria’s food security is critically dependent on maintaining an independent food system that operates outside of the influence of the supermarket duopoly.

Along these lines, a critical aspect of Victoria’s food system infrastructure has been overlooked in policy and planning, namely the Melbourne wholesale market, municipal markets and other private markets which are critical to maintaining a robust, fair, affordable and resilient food system. These markets were once actively protected by the Victorian government and City of Melbourne (prior to the establishment of the Epping market). **There is therefore a strong precedent for the State Government to play a more active role in ensuring Victorians benefit from an independent and resilient food system into the future.**

Recommendations

Sustain recommends to the Legislative Council Legal and Social Issues Committee Inquiry that it consider measures to constrain the stranglehold of the supermarket duopoly as part of a broader response to growing food insecurity in Victoria. In the first instance, we urge the Committee to support the recommendations of the Senate Select Committee Report on Supermarket Prices and insist that the Victorian Government advocate to the Commonwealth government for their full adoption and implementation.

Development of an integrated food system strategy

We recommend that the State Government adopt a statewide, whole-of-system and whole-of-government approach to Victoria's food system and food security.

The food system does not respect the boundaries or limitations of government departments or municipal boundaries. The food system – the integrity of which is essential for current and future food security – impacts and is impacted by virtually all areas of government policy as well as nearly all social and economic activity. Its effective governance therefore requires a systems approach that is commensurate with its cross-cutting nature. As we stated in our response to the Questions on Notice from the Environment and Planning Committee (VLA) Inquiry into Securing Victoria's Food Supply (Appendix 1), this requires a Victorian Food Systems and Food Security Strategy, developed with the full participation of Victoria's diverse communities. In particular, such a Strategy should emphasise and support the role of community food infrastructure and municipal markets (see below) for the vital role they play in securing affordable access to healthy and culturally appropriate food for all Victorians. This will require a thorough review of the Victorian Planning Provisions and Framework to reorient its current privileging of the supermarket duopoly in the design and development of new and existing suburbs, to prioritise municipal markets and community food infrastructure in significantly diversified and therefore much more resilient food retail environments for Victorians in the coming years.

Opportunities for action

- Co-design a Victorian food system strategy in consultation with Victorian communities, with food security as a priority action.
- Embed the USDA food security questions into the Victorian Population Health Survey on an annual basis with LGA level data analysis to inform targeted policy action.
- Resource the establishment of Regional Food Security Networks to support more coordinated responses to food insecurity at the local level.
- Reinstate the Victorian Food Relief Taskforce with broader representation from community food relief organisations.
- Complete priority actions outlined in the Food Relief Taskforce Action Plan, particularly the food relief volunteer capacity building initiatives such as weVolunteer and making the Food Stress Index and Food Relief Data Dashboard publicly available to all local governments.

Benefits

- Provides strategic priority, focus and direction for supporting outcomes of the Victorian Government's Health and Wellbeing Plan.
- More informed decision-making
- Creates a food-enabling state and local government policy ecosystem which integrates food as a public good rather than a commodity.
- Provides a framework for monitoring and evaluating impact
- Supports a regional monitoring framework with strong agency involvement.
- Improved flow of information and resources across municipal boundaries
- More diversified stakeholder representation in responding to diverse community needs

Deploy hypothecated taxation

As noted in our submission, the Victorian Government has significant revenue-raising powers that can be used to finance the achievement of these social and economic goals that will bring immense benefits to all Victorians, especially the most vulnerable. The case for the utilisation of these powers has clearly been made, both through the evidence presented to this Inquiry and many others, including the Senate Select Committee Inquiry on Supermarket Prices.

We urge the Committee to adopt our recommendations for deployment of hypothecated taxation to address the social and economic harms caused by the supermarkets (and the fast-food industry) to create a substantial Victorian Food Systems and Food Security Fund.

Opportunities for action

- Identify the most appropriate mechanism for using hypothecated taxation to address the social harms of the supermarket.
- Explore opportunities to introduce a similar tax for the fast-food industry which contributes to poor health and wellbeing outcomes and reduces economic diversity of local economies.
- Consult with health economists to understand the true costs of food insecurity for the Victorian economy as well as potential cost savings of preventative action.

Benefits

- Generates revenue to resource a Food Systems and Food Security Fund as part of a Victorian food systems strategy
- Develops a pool of funds to resource a grants program for councils and communities to respond to food insecurity at the local level.

Strengthen the existing municipal and wholesale market sectors

We believe that the importance of municipal markets has been overlooked in considerations about food security, which significant implications as noted above. Municipal markets and the Melbourne wholesale market should be regarded as critical food system infrastructure and prioritised as such in the state planning framework, local planning schemes and in neighbourhood precinct planning processes. As part of this, the food system resilience and its importance for health and wellbeing must be integrated into planning processes and thinking, alongside housing, transport, health and sanitation infrastructure.

The Victorian Government is, to Sustain's knowledge, in the unique position of owning the only publicly-owned wholesale market in Australia. State government oversight of Victoria's food supply also falls within the remit of the *Melbourne Market Authority Act 1977* whose objects are to:

- 1) provide a commercially viable wholesale facility for the efficient distribution of fresh produce;
- 2) optimise returns on land and assets controlled and managed by the Authority; and
- 3) ensure **a fair and competitive environment for the wholesale trading of produce.**

State and local government planning frameworks should be used to protect the competitiveness of the wholesale market by creating incentives to support municipal markets and independent greengrocers that depend on them.

Case study – Gleadell Street Market

Gleadell Street Market (GSM) has been running for 150 years and is part of the cultural and economic fabric of the City of Yarra, which owns and operates the market. Running Saturdays from 7am to 1pm, the market features an array of stallholders selling seasonal produce, bread, seafood, meat, dairy, condiments and other artisan products. Stallholders are culturally and linguistically diverse, thereby reflecting the broader Victorian community. In a fresh produce price analysis of 38 food retailers in inner metropolitan Melbourne, GSM was the third most affordable source of fresh produce, following Queen Victoria Market (most affordable) and a cultural grocer (second most affordable). A fresh produce basket at GSM cost \$509 compared to \$600 at the closest major supermarket. Savvy shoppers know fresh produce is even more affordable at the end of the market when stallholders offer "dollar bags." This low infrastructure, pop-up municipal market format is a tested model that benefits low-income households but is enjoyed by everyone by enlivening the built environment and offering affordable access to good food outside the retail monoculture of the supermarket system.

Opportunities for action

- Develop planning incentives for the establishment of new greengrocers in brownfield sites.
- Explore opportunities to replicate the low infrastructure, pop-up format of the Gleadell Street Market (case study above) in low-income neighbourhoods poorly provisioned by affordable, fresh food options.
- Create fiscal incentives to enable existing greengrocers to stay open into the late evening to assist them in competing with supermarket convenience.
- Prioritise the establishment of new municipal markets in greenfield developments, particularly on Melbourne's growth corridors where they can support local producers.
- Advocate to the Commonwealth government that wholesale markets and municipal and independent markets are considered.

Benefits

- A more resilient food system for Victoria
- Better access to affordable and culturally diverse produce
- More economic diverse neighbourhoods that reflect cultural, social and economic diversity of Victoria's communities
- Supports local food economy
- Healthier neighbourhoods and communities
- A stronger agricultural sector with diversified opportunities for market access

Invest in community food infrastructure

Community food infrastructure (CFI) encompasses a broad range of community-oriented food infrastructure from production to disposal. CFI is also sometimes described as culinary infrastructure, public food infrastructure, community food assets, and collective infrastructures of care. CFI can include community gardens, urban farms, communal bakeries, food co-ops, food hubs, community fridges, government-owned commercial kitchens or warehouse space, public pantries, municipal or community markets, public eating spaces or community composting hubs. CFI embeds food as a public good by providing vital urban infrastructure for communities to grow, prepare, access, share and celebrate food in non-market contexts.

CFI also support the exchange of cultural and intergenerational food knowledge and strengthen social cohesion. During the pandemic, CFI played an important role in enabling community organisations and local councils to collaborate in responding to the needs of vulnerable communities. Outside of crisis, CFI places an important role in social cohesion by providing a space for people to come together around food.

Despite the importance of CFI for supporting more equitable, sustainable, resilient and healthier community food systems, CFI has been overlooked in urban policy and planning.

Embedding community food infrastructure in public and social housing estates provides an opportunity to support food security at a local level. Some public housing estates have established resident-led food relief initiatives such as the Park Towers Food Pantry. These would benefit from more concrete support as they often lack DGR status and are not eligible for grants. A cluster of community food infrastructure in the Fitzroy and Carlton public housing estates (see case study below) demonstrate the multifunctional benefits. However, access to community kitchens for food relief and social connection activities are often hindered by excessive bureaucratic hurdles from the relevant state government departments.

Case study – Fitzroy/Carlton public housing estates

The Fitzroy Community Food Centre run by Cultivating Community at the Atherton Gardens public housing estate has emerged into a unique community food system ecosystem supporting the local community to share and access affordable food. A commercial kitchen at the bottom of the building is used for **free weekly “Meet & Eat” lunches** open to all where people can share meal preparation or simply enjoy the lunch. **Integration of social support services** such as Fitzroy Learning Network and CoHealth into the lunch program provides other assistance where needed. The **commercial kitchen** provides space for **cooking programs and clubs**, including an **after-school cooking program for children**. Public housing residents also use the kitchen to **host cultural celebrations** such as Eid. The Atherton Gardens community garden provides a place for estate residents to grow edible plants that reflect the community’s culinary diversity.

Cultivating Community facilitates the High Rise Community Bakery, also located at Atherton Gardens, a **local baking group and social enterprise** that enables community members to bake affordable, nutritious and delicious bread, build social connection and foster a space for knowledge sharing. The bread is sold on a ‘pay-as-you-feel’ sliding scale at **Community Grocer**. A separate initiative operating within the same space, Community Grocer is a low-cost market selling fresh produce at affordable prices in the communal spaces of both the Atherton Gardens and Carlton public housing estates. Just up to the road at a nearby public housing estate is the **Carlton Kitchen Library** where residents can borrow cooking items at no cost. This encourages cooking at home, supports community celebrations and contributes to a circular economy by giving unwanted appliances new life and keeping them out of landfill.

All within short walking distance of each other, this cluster of community gardens, community kitchen, community bakery, kitchen library and social grocery markets highlights the multifunctional benefits of **mobilising the infrastructure and spaces within public housing estates**. It offers a best-practice example of how community food infrastructure supports communities to prepare, distribute, share and celebrate food together, often at no cost or at subsidised prices. Because many of the events are open to the broader community, they also serve to break down barriers created by socio-economic disparity.

Opportunities for action

- Prioritise access to community food infrastructure in neighbourhood precinct planning processes.
- Nominate community food infrastructure as a key community infrastructure asset by the Victorian Planning Authority.
- Integrate community food infrastructure into state government-managed assets and spaces, particularly public/community/social housing developments, via the Community Infrastructure Loans Scheme, community infrastructure levies and developer contribution schemes. The Victorian Government's Level Crossing Removal Project offers the potential for new open spaces suited to the integration of community food infrastructure, alongside dog parks, skateboard parks and other new public infrastructure.

Benefits

- Enables cost-sharing for community food infrastructure with developers benefiting from urban development
- Facilitates government-community partnerships to address food insecurity at a local level.
- Contributes to more convivial and socially inclusive communities that reflects the diversity of the Victorian broader community.

Conclusion

Sustain believes that the practice of land-banking requires a whole-of-system approach involving improved government oversight of property ownership by the supermarket duopoly and the development of taxation strategies to address the harms. This would also enable resourcing of an integrated, statewide food systems strategy to enable coordinated action. We also see greater investment in public and community food infrastructure as a critical need in providing viable alternatives to the dominance of the supermarket duopoly. We believe this infrastructure is essential for strengthening the resilience of the Victorian food system and agricultural sector. Investment in public and community food infrastructure has the potential to delivery significant social, environmental, economic and health outcomes for all Victorians.

As food system experts, we welcome the opportunity to work with the Victorian government in creating a food system that serves the interests of the Victorian people.

Contact information

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Dr Kelly Donati
Sustain: The Australian Food Network, Co-founder and Acting Chair
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APPENDIX 1

QUESTION TAKEN ON NOTICE

David HODGETT: It is a bit separate to this, but I was fascinated when you were talking, Nick, about some of the benefits of improving food. You gave an example of \$182 million. I would be interested if you have done any work – and you can take it on notice if you like – around changing behaviour. I know I should probably eat better or drink less or exercise more, and doctors will tell you they keep telling that to their patients, but how do we actually change human behaviour? I just wonder if you have done any work around that, even if you want to take that on notice.

Nick ROSE: We can speak to it a little bit, but it might be good to take it on notice and get back to you with some actual references. But yes, it is critical, because that is ultimately what we are talking about here, a cultural change, if we are actually interested in a healthy Victorian population, which I think we should be. We have grown up in the last 50 or 60 years in a convenience culture, from TV meals through to fast food and now to Uber apps. Everything is on notice, and that is what is marketed and that is what is promoted. As anyone knows that goes into a supermarket and into the aisles, what is on discount, what is on special, what is in line of sight and what is near the check-out is not fruit and veg. So yes, it is a huge challenge. That is why we say, and Kelly mentioned this, that there is great value in changing what people experience when they walk around their streets and their suburbs, seeing what used to be commonplace, which was veggie gardens and fruit actually growing – the living tree with fruit, the living veggie patch with herbs.

ADDITIONAL QUESTIONS FROM THE COMMITTEE

Statewide food systems planning

1. What do you envisage a statewide food system and security strategy encompassing?
2. What types of initiatives would you like to see included in a strategy?
3. Why is it important that local governments get involved in food system strategy?
4. How do you envision protections for agricultural lands featuring in a statewide strategy?

1. What do you envisage a statewide food system and security strategy encompassing?

The aim of a Victorian food system and food security strategy should be to provide effective governance and coordination of Victoria's food system to ensure its integrity and healthy functioning for current and future generations, guided by a shared vision and key principles.

Key components and principles

These should include:

- **Participatory development**, foregrounding the perspectives of First Nations communities as well as those with lived experience of food insecurity
- **Whole-of-government and whole-of-system collaborative governance and coordination mechanism** (e.g. a Victorian Food Systems Committee) to guide implementation
- **Human and ecological health** as a core priority and guiding objective
- A **rights-based approach**, committing to the progressive realisation of the human right to good food for all Victorians
- A focus on food system **localisation and decentralisation** to strengthen resilience
- A focus on **regenerative and sustainable agriculture** to adapt to and mitigate the impacts of accelerating climate change as well as to reduce dependency on imported inputs
- **Mapping and auditing the Victorian food system and supply chains** to identify key vulnerabilities, gaps and inefficiencies
- A **supportive state planning framework** that prioritises food system considerations and public health (including production, distribution and sale of healthy food) as well as **protects vital farmland including in peri-urban areas**
- **Clear, measurable targets** with appropriate indicators and **regular monitoring and evaluation** to track progress
- **Ensure alignment with other key policy portfolios and key strategies** to ensure coherence across government (e.g. First Nations Treaty, environment and climate change, health, transport, infrastructure, regional development)

A good starting point for the Committee is [*Towards a Healthy, Regenerative and Equitable Food System in Victoria: A Consensus Statement*](#).¹ Developed in 2021 by a collective of cross-sector organisations under the facilitation of VicHealth and launched in June 2022, the Consensus Statement sets out the following vision for Victoria's food system:

“An equitable, regenerative, prosperous and resilient food system that ensures access to healthy and culturally appropriate food for all Victorians; a system that values nourishment, fairness, dignity, democracy, participation, inclusivity and stewardship of the natural environment.”

The Consensus Statement also articulates **a set of seven principles to guide action by the Victorian government** as it engages with this vital area of public policy, namely:

¹ <https://vicfoodsystem.org.au>

- *Uphold food as a basic human right*
- *Value inclusion and self-determination so that historically marginalised and disadvantaged groups participate in decisions and activities to reshape the food system*
- *Provide healthy foods within planetary boundaries, focusing on diverse, nutritious and minimally processed foods*
- *Strengthen local and regional food economies, fostering social connection, diversification and resilience*
- *Cultivate food literacy in the broader context of eco-literacy*
- *Promote fair incomes and working practices for farmers and food workers*
- *Celebrate the traditional food practices of Victoria's multiple ethnicities and diverse communities*

To these principles we would add the following:

- *Uphold the aspirations of Victoria's First Nations to realise their aspirations for food sovereignty and connection to Country through the recovery of cultural food knowledge, plants and practices.*

Leverage points for effective action

The Consensus Statement **set out ten leverage points** that can **serve as a roadmap for the Victorian government** in taking the actions necessary to realise the Statement's vision. These leverage points are as follows:

1. Legislate the right to food to create an enabling policy environment.
2. Establish a whole-of-government Food Systems Committee to oversee the participatory development and implementation of a Victorian Food System Strategy and Investment Plan.
3. Establish a comprehensive performance measurement and monitoring framework for Victoria's food system in the State of the Environment Report.
4. Support the transition to regenerative farming and agroecological solutions.
5. Create a Local Food Investment Fund to strengthen local and regional food systems.
6. Support Victorian farmers and food businesses through mandatory public sector food procurement policies.
7. Invest in universal food systems literacy for all Victorian school students.
8. Mandate and resource the participatory development of local government community food system strategies through amending the *Public Health and Wellbeing Act 2008*.
9. Amend the Victorian Planning Provisions to include health and environmental promotion as key considerations in planning decisions.
10. Develop a coordinated and collaborative food relief sector that prioritises dignified access to fresh and healthy food.

These 10 leverage points provide a good indication of the **scope for a Victorian Food Systems and Food Security Strategy. Coordination and governance (Leverage Point 2) are critical and must be adequately resourced by the State government.**

The need for a participatory, whole-of-system approach

The Committee will note that Leverage Point 2 speaks of the ‘**participatory development and implementation of a Victorian Food System Strategy and Investment Plan**’. This commitment to participatory policy making and wide public consultation is vital to ensure that the Strategy reflects the needs and priorities of Victorian communities as well as their trust and confidence in its purpose and aims, as they will need to be involved in its implementation for it to be successful. A **participatory, collaborative and inclusive approach has been widely followed** in the creation and implementation of food system strategies, policies and plans, both in Victoria and internationally. Sustain has supported the community consultation, development and/or implementation of several food system strategies at the local government level in Victoria:

- [City of Melbourne Food Policy 2024-2034 \(endorsed 4 June 2024\)](#)
- [Community Food Strategy 2018-2026](#) (Cardinia Shire)
- [Food System Strategy 2020-2030](#) (Greater Bendigo)
- [Food Economy and Agroecology Strategy 2022-2028](#) (Mornington Peninsula Shire)
- [Urban Food Strategy 2023-2027](#) (Banyule)
- [Food System Strategy 2017-2024](#) (Merri-Bek – [now consulting on an extension to 2027](#))

These and other examples demonstrate the need for participatory approaches to the development of food systems and food security strategies and plans.

In addition to participation and inclusion, the complexity of food system issues requires a coordinated, whole-of-system approach. The Federal House Standing Committee on Agriculture’ 2023 report, [Australian Food Story: Feeding the Nation and Beyond](#), made several recommendations that, in our view, provide guidance to the Committee in terms of what a Victorian Food Systems and Food Security Strategy should encompass, including the following:

- Expand urban agriculture, including to develop skills and encourage careers in agriculture (Rec.10)
- Protect agricultural land from urban sprawl and non-agricultural uses (Rec. 13)
- Develop a Food Supply Chain Map, identifying key points of vulnerability (Rec.14)
- Develop a transport resilience plan focused on food security (Rec.15)
- Develop measures to eliminate food waste, including through improved data sharing across the supply chain and establishing regional food hubs (Rec.18)
- Develop and fund a research program focused on the development of a circular food economy (Rec.22)

- Develop and fund long-term research, development and extension to promote sustainable agriculture (Rec.25)
- Conduct surveys of household food insecurity every three years using the USDA Household Food Security Survey Module (Rec.29)
- Develop a school curriculum for food and nutrition education including basic cooking skills (Rec.30)

The NSW Environment and Planning Committee’s 2022 report on its Inquiry into food production and supply similarly recommends the development of a comprehensive Food System Plan for NSW that addresses the food system as a whole, including:

- strategies to address food insecurity
- promoting equitable access to nutritious food
- consideration of food production, including urban agriculture
- any required changes to planning and development frameworks
- points of integration with local government and service providers

While state government food system planning and strategy development is in its nascent stages in Australia, it is well advanced in the United States and elsewhere. In its [Overview of State and Regional Food System Plans and Charters](#) (2021), Michigan State University’s Centre for Regional Food Systems found that ‘nearly 60% of US states have an active food systems plan or one under development.’

Best-practice examples at the state level in the US include the [Vermont Farm to Plate Plan 2009-2030](#). However there are a range of other examples at the state and national level from which to benchmark a best-practice approach:

- [Colorado Blueprint of Agriculture and Food 2017](#)
- [Food Policy for Canada 2019](#)
- [UK National Food Strategy 2021](#)
- [Alaska Food Strategy Taskforce / Statewide Action Plan 2022](#)
- [Good Food Nation Act Scotland 2022](#)

2. What types of initiatives would you like to see included in a strategy?

We strongly encourage the State government to focus strategic actions towards systemic and structural changes that shape the food and commercial environments in which Victorians live, eat and make decisions about food. Research has demonstrated that policies and strategies targeting (for example) food environments and the commercial determinants of health are far more effective than policies focused on individual behaviour change.² It is also noteworthy that

² Hagenaars, L. L., Schmidt, L. A., Groeniger, J. O., Bekker, M. P., Ter Ellen, F., de Leeuw, E., van Lenthe, F.J., Oude Hengel, K.M. & Stronks, K. (2024). Why we struggle to make progress in obesity prevention and how we might

public health policies that have had the greatest positive impacts on population health are those led and coordinated by government with little to no external influence from food and beverage industries.³

We would like to see several high-level as well as specific initiatives included in a statewide food system and security strategy. For example, the 10 leverage points in the aforementioned Consensus Statement as well as the roadmap (page 59) and recommendations in Sustain's 2022 *Growing Edible Cities and Towns* report (commissioned by Agriculture Victoria (see Appendix) offer high-level recommendations for changes needed to the state government planning framework and other critical needs for transitioning to a more resilient, sustainable and healthy food system. In addition to the recommendations in the documents above, we would like to see the following initiatives in a food system and security strategy.

Type of initiative	Recommendation	Rationale
First principles		
First Nations sovereignty	Foreground First Nations knowledge and culture in the food system	To ensure that food system investments and initiatives support connection to Country and economic self-determination for all Aboriginal Victorians.
The human right to food	Legislate food as a basic human right	Provide the strongest possible legal and moral grounding for the Strategy in core principles of international human rights law
Participatory policy approaches	Establish a whole-of-government Food Systems Committee to oversee the participatory development and implementation of a Victorian Food System Strategy and Investment Plan.	To ensure the Strategy reflects the needs and priorities of Victorian communities as well as their trust and confidence in its purpose and aims.
Effective resourcing and investment		
Fiscal innovation and taxation	Create an Ultra-Processed Food and Beverage Act (similar to the Victorian Tobacco Act 1987)	To reduce the growing health harms from these products and to establish a significant fund from which preventative health and food system initiatives can be financed for the long-term. ⁴
Fiscal innovation and taxation	Identify community food infrastructure (facilities for communal growing, cooking, eating) as part of the Essential	To ensure infrastructure needed for community food system resilience can be funded through existing fiscal mechanisms such as developer contribution schemes (including public open space

overcome policy inertia: Lessons from the complexity and political sciences. *Obesity Reviews*; Tseng, E., Zhang, A., Shogbesan, O., Gudzone, K.A., Wilson, R.F., Kharrazi, H., Cheskin, L.J., Bass, E.B. & Bennett, W.L., 2018. Effectiveness of policies and programs to combat adult obesity: a systematic review. *Journal of general internal medicine*, 33, 1990-2001.

³ Ngqangashe, Y., Friel, S., & Schram, A. (2022). The regulatory governance conditions that lead to food policies achieving improvements in population nutrition outcomes: a qualitative comparative analysis. *Public Health Nutrition*, 25(5), 1395-1405.

⁴ [Modelling released by the Australian Medical Association in June 2024](#) revealed that a tax on sugar-sweetened beverages only would generate nearly \$4 billion over the four financial years (24/25 - 27/28). Proportional to population, that would equate to \$1 billion for Victoria, \$250 million per year – which could easily be doubled by extending the tax to ultra-processed and fast foods.

Type of initiative	Recommendation	Rationale
	Works List and open space facilities.	contributions, developer infrastructure levy and community infrastructure levy). To create a planning framework that empowers local government to invest in community food system priorities (including food system localisation and security as well as social cohesion and ecological wellbeing).
Community food system investment	Develop and implement a community food projects scheme (akin to Agriculture Victoria's Small-Scale and Craft grants program).	To address under-resourcing in the Victorian community food sector. To ensure local communities are supported to ensure the food supply needs are met at the local level. A useful model is the USDA's Community Food Projects Competitive Grants Program .
Planning reform		
Community food system planning	Embed food system considerations into neighbourhood precinct planning. Incorporate access to greengrocers and other independent food outlets as key liveability indicators in precinct planning.	To ensure precinct planning frameworks and processes encourage economic diversity of food retailing and access. To embed, measure and monitor food retailing diversity in strategic planning for 20-minute neighbourhoods.
Planning reform	Mandate that public health and other food system considerations are incorporated in the state planning framework and must be considered in local planning schemes and decisions. Implement planning controls on new convenience, fast food and takeaway outlets, particularly near schools and early childhood education.	To ensure that planning decisions enhance public health and reflect community food system priorities. To tackle the dominance of unhealthy food in the urban landscape and mitigate the impacts on young people's food choices and their health now and into the future.
Planning reform	Integrate community food infrastructure (communal spaces for growing, cooking and eating) in all new social and public housing.	To ensure vulnerable and/or low-income households have good food access. A best-practice example of a thriving food infrastructure cluster is the Atherton Gardens Public Housing Estate (Fitzroy) which includes a community kitchen, community garden, kitchen equipment library, community bakery and low-cost weekly community market.
Urban agriculture	Recognise and support urban agriculture as a legitimate land	To support the diversification of Victoria's food supply. See Sustain's 2022 report Growing Edible

Type of initiative	Recommendation	Rationale
	use in the state government planning framework.	Cities and Towns for a detailed roadmap to support the Victorian urban agriculture sector (Appendix 1).
Economic development		
Regional development	Support cooperative models for food processing, distribution and retailing through public investment in shared food processing infrastructure in rural and regional areas (including small-scale abattoirs, storage/coolrooms, food hubs, commercial kitchens etc).	<p>To build greater economic diversity in the Victorian food economy.</p> <p>To revitalise regional food economies and strengthen supply chain connections.</p> <p>To strengthen the financial viability of smaller-scale food businesses in urban and regional areas.</p> <p>To encourage cross-sectoral and B2B collaboration in the Victorian food system.</p>
Food system diversification	<p>Provide incentives for greengrocers and independent retailers to have extended hours (e.g. stay open till 7pm).</p> <p>Incentivise empty commercial real estate to be used by independent food start-ups.</p> <p>Use precinct neighbourhood planning schemes to incentivise mobile and/or pop-up fresh produce markets, particularly in outer suburbs and neighbourhoods with empty high street shops.</p>	<p>To create more economic diversity in the Victorian food retailing landscape.</p> <p>To ensure diverse market channels for Victorian food producers and makers.</p> <p>To support urban and economic revitalisation at the local level.</p> <p>To improve and diversify access to healthy and fresh produce in outer suburbs, particularly where unhealthy food outlets are over-represented and/or healthy food outlets are under-represented.</p> <p>To retain existing independent food retailers by supporting them to compete with the supermarket duopoly.</p>
Public procurement processes	Work with procurement managers across the public service to map current arrangements and identify opportunities to progressively support Victorian food producers.	<p>To ensure diverse market channels for Victorian food producers and makers.</p> <p>To enhance the viability, sustainability and resilience of the Victorian food economy.</p>
Food system capacity building, education and training		
Capacity building in government	Invest in food systems professional development programs across local and state government departments.	To support government departments and policymakers with the skills and knowledge needed for effective food systems policy and action.
Secondary schools	Resume the Secondary Schools Agriculture Fund and incorporate a focus on urban agriculture.	To strengthen the urban agriculture sector while building agricultural literacy in young people across urban and regional settings.
Vocational training	Embed food systems knowledge in relevant free TAFE courses, e.g. cookery, hospitality, kitchen	To provide the foundations for a workforce that can support the transition to a secure, sustainable and healthy food system.

Type of initiative	Recommendation	Rationale
	management, agriculture, horticulture, etc.	To ensure vocational graduates working in food-related industries have the skills and knowledge to meet current and future food system challenges.
Higher education	Work with the higher education sector to embed food systems thinking into planning curriculum.	To ensure planning professionals are well equipped to understand the food systems implications of planning processes and decisions.
Adult education	Invest in the urban agriculture training and employment pathways. Develop farmer incubator programs for young and new farmers.	To support the development of new and non-traditional entries into the agricultural sector. <i>Examples:</i> Sustain's First Nations urban agriculture internship program .

3. Why is it important that local governments get involved in food system strategy?

There are many reasons for local government to be involved in food system strategy development and implementation, including their obligations to develop Municipal Public Health and Wellbeing Plans every four years and to give consideration to climate change at a local level. Recent research on local government food systems governance has articulated other reasons why local governments can and do play an active role in food system strategy:⁵

- their responsibility for policy areas that impact on, and are impacted by, food systems, including land use planning, transport, sustainability, waste management and community services;
- their management of public land which can be made available for community and / or commercial food growing as well as public assets and facilities (e.g. neighbourhood houses, commercial kitchens, storage facilities) which can support community-led food programs, social enterprises and initiatives;
- their ‘unique insights into local and community needs, enabling them to respond with targeted, place-based measures’;
- their role in facilitating ‘community participation to support deliberative forms of food system governance unavailable at state and federal levels.’

A survey of 64 local governments in Victoria and NSW conducted in 2021 found that many local governments are already engaged in a range of activities including food waste minimisation, social and cultural events and education programs, community gardening/verge planting, Meals on Wheels programs and, increasingly, food relief initiatives.⁶ Much less frequent were actions or

⁵ Carrad, A., Aguirre-Bielschowsky, I., Reeve, B., Rose, N., & Charlton, K. (2022). Australian local government policies on creating a healthy, sustainable, and equitable food system: analysis in New South Wales and Victoria. *Australian and New Zealand Journal of Public Health*, 46(3), 332-339.

⁶ Carrad, A., Aguirre-Bielschowsky, I., Rose, N., Charlton, K., & Reeve, B. (2023). Food system policy making and innovation at the local level: Exploring the response of Australian local governments to critical food systems issues. *Health Promotion Journal of Australia*, 34(2), 488-499.

programs supporting urban and peri-urban agriculture, sustainable and regenerative agriculture and market gardening (e.g. through the provision of land).

While not all councils have food system strategies, many (in addition to those mentioned above) have recently supported the establishment of food system coalitions or networks at the local level to ensure strong partnerships between council and the local community. These include:

- [Local Food Coalition 2023-2025](#) (City of Ballarat)
- [Local Food Network 2024-2026](#) (Golden Plains Shire Council)
- [Food Systems Roadmap 2024](#) (Central Goldfields Shire Council)
- [Food Systems Collective 2024](#) (City of Melton)

Enablers of local government involvement in food systems work

A significant enabler (and funder) of this work has been VicHealth through its [Local Government Partnership and Modules flagship](#). Other key enablers of local government engagement in food system strategy development and implementation include:

- strong internal support and leadership (either from executive or elected officials);
- the creation and funding of dedicated food system or food security officer positions;
- strong local and regional partnerships and collaborations; and
- access to funding (state or federal).

Barriers to effective state government action

A recent study regarding the barriers to local government implementation of food systems initiatives identified the following issues: lack of human resources (81%), insufficient funding (70%) and organisational priorities (53%).⁷ In particular, the authors offered these reflections on short-term, project-based funding as a barrier to local government food systems action:

*[Local governments] achieve policy adoption and implementation of activities but [often] cannot demonstrate positive impact or sustain programs of work prior to funding ceasing. **Dedicated long-term investment for food system work is essential at local, state and federal levels, including resourcing for governance processes** (e.g. data collection, community involvement and policy development) in addition to project implementation and evaluation.*

Short-term funding is not the appropriate financing mechanism when the goal is to achieve systemic change and impact. Funding must be for the long-term – such as the Vermont Farm to Plate Plan, now entering its 15th year and has at least another six still to run.

⁷ Carrad, A., Aguirre-Bielschowsky, I., Rose, N., Charlton, K., & Reeve, B. (2023). Food system policy making and innovation at the local level: Exploring the response of Australian local governments to critical food systems issues. *Health Promotion Journal of Australia*, 34(2), 488-49.

Other research focused on food system strategy and policy development and implementation in local government in Victoria has identified a range on systemic factors and barriers to effective local government action on food systems.^{8 9 10 11 12}

Organisational factors impeding local government action

- Lack of commitment from senior leadership (this is linked to the lack of policy mandate at state and federal level mentioned below);
- Limited organisational capacity (funding, staffing and expertise);
- An institutional culture of risk-aversion;
- Lack of engagement in food systems outside community and health directorates;
- Loss of specialised knowledge through poor staff retention on food system initiatives (often resulting to short-term project funding);
- An overestimation by state government partners of local government's capacity to address systemic drivers of food system issues.

Policy barriers that create a poor policy mandate for action include:

- Lack of direction from, and coherence between, state and federal law and policy relevant to food systems, including a state planning framework that acts as a major legislative barrier to improving healthy food environments;
- Lack of political will and institutional interest to engage with evidence on a range of food systems issues;
- Lack of state funding supporting a whole-of-food-system approach, with most funding directed towards short-term projects and specific topics rather than core functions such as hiring staff (in contrast to the Vermont Agriculture and Food System Strategic Plan 2021-2030, a statewide food system strategy supported since 2009 by 20 years of dedicated funding and backed by state government legislation);
- Limited ability of local government to increase its revenue streams to effectively resource food system policy initiatives;
- Lack of jurisdiction over taxation, advertising regulation or welfare policy;
- An overemphasis on individual behaviour that devolves responsibility to consumers while ignoring corporate actors in shaping food system behaviour;
- Unequal power dynamics and policy influence between corporate and community actors in the food system;

⁸ Carrad, A., Turner, L., Rose, N., Charlton, K., & Reeve, B. (2022). Local innovation in food system policies: A case study of six Australian local governments. *Journal of Agriculture, Food Systems, and Community Development*, 12(1), 115–139. <https://doi.org/10.5304/jafscd.2022.121.007>

⁹ Clarke, B. and Moore, J. (2015). An investigation of Victorian municipal public health plans for strategies that alleviate food insecurity: a qualitative case study. *International Journal of Humanities and Social Sciences*, 6(1), 1-16.

¹⁰ Slade, C. and Baldwin, C. (2016). Critiquing Food Security Inter-governmental Partnership Approaches in Victoria, Australia. *Australian Journal of Public Administration*, 76(2), 204–220.

¹¹ James, S. W., Friel, S., Lawrence, M. A., Hoek, A. C., & Pearson, D. (2018). Inter-sectoral action to support healthy and environmentally sustainable food behaviours: a study of sectoral knowledge, governance and implementation opportunities. *Sustainability Science*, 13(2), 465–477. <https://doi.org/10.1007/s11625-017-0459-8>

¹² Carrad, A., Aguirre-Bielschowsky, I., Rose, N., Charlton, K., & Reeve, B. (2023). Food system policy making and innovation at the local level: Exploring the response of Australian local governments to critical food systems issues. *Health Promotion Journal of Australia*, 34(2), 488-49.

- Onerous reporting and inflexible “approach to community, management, and accountability structures” in intergovernmental partnerships (state-local) on food system issues;
- An absence of systematic, comprehensive monitoring of food system issues at state and federal levels, impacting data available to local governments to plan, implement and evaluate their activities.

Recommendations to support local government involvement in food systems strategies

While the Victorian Health and Wellbeing Plan 2023-2027 mentions food systems as a challenge and consideration for health and wellbeing, it presents several limitations for action. Although there are targeted strategies identified under each of the Plan’s ten priorities, there is no food system strategy at the state or local government level. This provides a weak mandate for investment and action.

Research supports the following recommendations for state government action to support local governments to engage more deeply and effectively in food system strategy development, implementation and governance:¹³

- A statewide, comprehensive food system and food security plan that set objectives and targets on priority food system issues.
- An explicit legislative and / or policy mandate for food systems [to] empower local governments to develop and implement food system policies and programs that promote positive health, environmental, social and economic outcomes for the community.
- Amendment of state government planning frameworks to enable local governments to encourage opening fresh food retail outlets and restrict new fast-food restaurants.

As regards the **critical issue of resourcing and capacity for local government and community organisations to engage in food system strategy development and implementation**, a useful model for the Committee and the Victorian government to consider is the recently launched [Regional Food System Partnerships grants program](#) of the US Department of Agriculture. This creates two streams of grants: 24-month Planning and Design Projects (\$USD100,000 - \$USD250,000) and 36-month Implementation and Expansion Projects (\$USD250,000 - \$USD1,000,000). Eligible entities include local governments, food councils / networks, not-for-profit organisations, First Nations organisations and producer cooperatives.

4. How do you envision protections for agricultural lands featuring in a statewide strategy?

There are several examples for the protection of agricultural land that could be embedded in a statewide food system strategy.

The [Ontario Greenbelt Plan \(2017\)](#) aims to protect the province’s most important and productive farmland through the following:

- Protecting against the loss and fragmentation of the agricultural land base and supporting agriculture as the predominant land use;
- Providing permanent protection to the natural heritage and water resource systems that sustain ecological and human health;

¹³ Carrad, A., Aguirre-Bielschowsky, I., Rose, N., Charlton, K., & Reeve, B. (2023). Food system policy making and innovation at the local level: Exploring the response of Australian local governments to critical food systems issues. *Health Promotion Journal of Australia*, 34(2), 488-49.

- Creating an environmental framework for urbanisation in south-central Ontario;
- Supporting a diverse range of economic and social activities associated with rural communities, agriculture, tourism, recreation and resource uses; and
- Building resilience to and mitigates climate change.

The [British Columbia Agricultural Land Reserve](#) aims to

- preserve the agricultural land reserve;
- encourage farming of land within the agricultural land reserve in collaboration with other communities of interest;
- encourage local governments, First Nations, the government and its agents to enable and accommodate farm use of land within the agricultural land reserve and uses compatible with agriculture in their plans, bylaws and policies.

The City of Boston planning reform ([Article 89](#)) is an exemplar planning framework that:

- establishes zoning regulations for the operation of urban agriculture activities;
- provides standards for the siting, design, maintenance and modification of Urban Agriculture activities that address public safety and minimize impacts on residents and historic resources in the City of Boston.

With regard to specific changes to the planning framework, we defer to the expertise of planning expert Linda Martin-Chew and the recommendations in her own submission to the Inquiry:

1. Commit to land use planning regulation to prioritise peri-urban agriculture over other land uses. Apply the benchmarking principles (relating to food production, processing, distribution and waste management) in any review of planning regulation because they are specifically aimed at supporting a local, sustainable food system.
2. Government intervention is required to reduce the rate of conversion of agricultural land to residential use. Bring forward Action 16 from the Planning for Melbourne's Green Wedges and Agricultural Land Action Plan to require parliamentary ratification to subdivide land below the minimum lot sizes in the Farming Zone and Rural Activity Zone within 100 kilometres of Melbourne. Noting this appears to require an amendment to the *Planning and Environment Act 1987*, investigate measures to prevent a rush of rural subdivision applications in the wake of the recent release of the Action Plan and prior to the implementation of this action.
3. Skills development in food systems planning and food literacy is needed at all levels of government so that long-term planning and policy actions promote a resilient, sustainable, healthy, and fair food system for Melbourne.
4. Sustainable agricultural practices that are associated with productive uses should be a specific inclusion in the purposes of each rural zone in Victoria. The support for "sustainable agriculture" in Victorian planning schemes could be strengthened, along with additional guidance on what attributes sustainable agriculture is likely to have. For example, agroecological production models are recognised as providing and supporting biodiversity enhancement, sustainable land management, and the retention of landscape values.