

# Victorian Parliamentary Inquiry into Food Security

**Response to consultation  
July 2024**

## **Recipient**

Parliament of Victoria - Legislative Council Legal and Social Issues Committee  
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**Dietitians Australia acknowledges all traditional custodians of the lands, waters and seas that we work and live on across Australia. We pay our respect to Elders past, present and future and thank them for their continuing custodianship.**

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## About Dietitians Australia

Dietitians Australia is the national association of the dietetic profession with over 8500 members, and branches in each state and territory. Dietitians Australia is the leading voice in nutrition and dietetics and advocates for the profession and the people and communities we serve.

The Accredited Practising Dietitian (APD) program provides an assurance of safety and quality and is the foundation of self-regulation of the dietetic profession in Australia.

This submission was prepared by members of the Dietitians Australia following the [Conflict of Interest Management Policy](#) and processes approved by the Board of Dietitians Australia.

Contributors included members of the Dietitians Australia Food and Environment Interest Group and others with wide ranging expertise in public health, clinical dietetics, food systems, and academia.

It is the position of Dietitians Australia that to promote equitable human and planetary health, a food system transformation is needed that supports the population to adopt healthy and sustainable diet-related practices.

An equitable, healthy and sustainable diet must:

- be nutritionally adequate, healthy and safe
- have low environmental impact and be protective of natural resources and biodiversity
- consider First Nations Knowledges and be culturally acceptable
- be accessible, economically fair and affordable.

Dietitians Australia acknowledges that it is critical to prioritise Indigenous knowledges in consultation, policymaking and implementation processes to achieve these recommendations.

## Terms of Reference

With this submission, Dietitians Australia responds to the following Terms of Reference of the Inquiry into Food Insecurity in Victoria:

The impacts and drivers of, and solutions for, food security in Victoria, including but not limited to:

1. the impact of food insecurity in Victoria on
  - a. physical and mental health
  - b. poverty and hardship
2. options available to lower the cost of food and improve access to affordable, nutritious and culturally appropriate food.

## Recommendations

Dietitians Australia calls on the Victorian Government to consider the following recommendations:

**1. POLICY: Support the development of national, state and local policies and plans, including:**

- supporting the Federal Government to create a National Nutrition Policy and implementation plan which prioritises public health across all food systems and food security for all Australians (Dietitians Australia, 2017, #)
- supporting a National Food Security Plan (Spencer, 2024, #), (VicHealth and the Food Systems and Food Security Working Group, 2022)
- legislating the right to food in Victoria and embedding it into all relevant state and local government policies, budgeting processes and activities. (VicHealth and the Food Systems and Food Security Working Group, 2022)

- supporting the Reducing Supermarket Dominance Bill 2024 (*Reducing Supermarket Dominance Bill 2024 – Parliament of Australia, 2024*)
- 2. GOVERNANCE: Strengthen food systems governance capacity by:**
    - investing in a Food Systems Committee to oversee the creation of a Victorian Food System Strategy and Investment Plan (VicHealth and the Food Systems and Food Security Working Group, 2022)(Adams et al., 2016, #)
  - 3. MONITORING: Work with the Federal government to implement routine, robust food insecurity monitoring and surveillance systems to identify drivers, impacts and effective strategies.**
    - Include the USDA 18-question Household Food Security Survey Module in government health surveillance systems and Australian Health Surveys (Mckay et al., 2019, #)
    - Implementation of a mandatory reporting system for pricing of staple food products in remote community stores. This information should be publicly available to consumers to improve transparency and competition in the market.
  - 4. HEALTH EQUITY: Address individual and community social determinants of health through:**
    - recognising social, cultural and environmental determinants of health in all policy decisions, including climate and energy policy
    - increasing Remote Area Allowance for recipients of social security payments (particularly those living in very remote areas) to adequately compensate for the higher cost of living associated with residence in remote communities (*Zone Tax Offset - Commissioned Study, 2020*)
    - supporting local second-hand appliance organisations and community tool/appliance pantries
    - supporting subsidies for equitable access to interdisciplinary care including, but not limited to:
      - Dietitians for assessment of individualised food and nutrition requirements to support disease prevention and management, and providing education on accessible and affordable meals and food sources
      - Occupational therapy for assessments and functional aides to assist in food preparation
      - Speech pathology for diagnosis of oral motor conditions and support to develop or rehabilitate feeding and oral motor skills
    - Public health campaigns breaking down social/conceptual barriers to accessing food relief namely fear/embarrassment and the belief that others have greater needs.
  - 5. FIRST NATIONS KNOWLEDGE: Involve First Nations peoples at all levels of decision making and implementation through:**
    - prioritising local expertise, local needs and local governance structures in both long-term planning and emergency responses to food and water security (Barbour et al., 2022, #), (Food and Agriculture Organisation, 2021) (Climate and Health Alliance, 2021)

- supporting the priority actions recommended in the Food Policies for Aboriginal and Torres Strait Islander Health (FoodPATH) Project Publications released this month (Browne et al., 2024, #)

**6. FOOD SYSTEM: Support a resilient food system for human and planetary health through:**

- creating a Local Food Investment Fund to grow capacity, improve coordination and drive efficiencies in local food infrastructure (Victorian Food Security and Food Systems working group, 2022)
- transitioning all public sector food procurement and retail to preference healthy and sustainably produced food sourced locally or regionally by developing compulsory social and ethical food procurement and retail standards and implementation assistance (Barbour et al., 2022, #) (Victorian Food Security and Food Systems working group, 2022)
- investing in regional infrastructure that centralises the collection of surplus or off-specification food, to allow greater volumes to be collected and sold for repurposing, or donated to food rescue organisations (Barbour et al., 2022, #).

## Background and Priority

Dietitians Australia welcomes the opportunity to provide input into this inquiry.

Food insecurity is defined by the Food and Agricultural Organisation as the lack of reliable physical, social or economic access to enough nutritious, safe and appropriate foods for an active and healthy life (Food and Agriculture Organisation, 2021). The 2023 Food Bank report identified 3.7 million Australian households (36%) that experienced moderate to severe food insecurity in the last 12 months (almost double since 2021/2022 data) and 79% of food insecure households reported the rising cost-of-living as the biggest reason for their hardship, a rise from 64% in 2022. (Food Bank, 2023, #). In Victoria, food security dropped by 2% between 2022 and 2023 - from 67% to 65% households reporting feeling food secure (Food Bank, 2023, #).

### The impact of food security on health and wellbeing

Cost of living pressures and financial insecurity has had a large impact on food access and choices. Weekly menu plan shopping lists for healthy dinner meals for 4 people (using Coles online) increased from ~\$100 in 2015 to ~\$140 in 2024” when purchasing the same products - of this rise in cost only \$14.48 can be attributed to inflation (Reserve Bank Australia, n.d.). The consequence of such is that many Australians are not able to choose the foods they eat and are at the mercy of donations which often consist of largely processed foods and minimal fresh produce, unlikely to adhere to the Australian Guide to Health Eating. Nearly half (48%) of respondents to the Food Bank Hunger Report shared they reduced their purchasing of fresh produce and protein due to rising costs.” (Food Bank, 2023, #).

Food insecurity is thought to be more prevalent amongst people with mental illness due to disruptions across several of the domains of food security (Figure 1), such as higher rates of insecure housing with limited cooking facilities, changes in capacity to access transport and food stores, as well as difficulties preparing food. People living with a mental health condition may also experience decreased economic participation and an associated lower income, which may lead to food insecurity (Seivwright et al., 2020, #) (Browne & Ponce, 2020, #).

A diet low in quality protein and fresh food intake often results in an increased intake of ultra processed foods (Lane et al., 2024, #) which can significantly increase risk of developing chronic health conditions and complications including but not limited to: Type 2 Diabetes Mellitus, osteoporosis, cardiovascular disease and malnutrition (US Dept Health and Human Services, n.d., #). Chronic conditions make up an overwhelming proportion of the burden of disease – 91% of non-fatal burden and 78% of fatal burden in 2023 (AIHW, 2024, #). These conditions lead to diminished community participation, contribute to a burden on the health system and higher health care expenditure (*Chronic Conditions*, 2024). The rising cost of living impacts the way dietitians do their job. The level of food insecurity “does not impact the health advice but does impact the practicalities of implementing the advice (eg, needing to provide more budget friendly ideas and solutions).” This means that individuals seeking dietetic support may not be able to adhere to best practice nutrition advice for their condition. Individuals unable to eat according to their health condition increase the likelihood of presentation to hospital Emergency Departments, longer hospital admissions and higher mortality rates. For individuals not able to access culturally appropriate foods or partake in cultural and religious events and practices, this can lead to increased feelings of cultural disconnection and poor mental health outcomes. (AIHW, 2023)

## Drivers of food security

### What determines food security?

Availability	Access	Utilisation	Stability	Agency	Sustainability
Food quality and quantity	Physical (mobility, transport)	Biological utilisation of food	Adequate food for economic or health crises	Personal capacity to make food choices	Long-term regeneration of natural, economic and social systems
Home food production	Social acceptability	Nutrition knowledge	Stability across seasons	Engagement in policy processes	
Meeting dietary needs	Financial means	Clean water		Food sovereignty	

**Figure 1:** The six pillars of food security: availability, access, utilization, stability, agency and sustainability (adapted from FAO – Food and Agricultural Organisation of the United Nations)<sup>3,4</sup>

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## Rationale for recommendations: opportunities to improve food insecurity

### Policy

#### National Nutrition Policy

We call on all Australian governments to support the development of a new National Nutrition Policy. There is an urgent need for the Federal Government to develop an up-to-date National Nutrition Policy with a well-resourced, co-ordinated, evidence based and strategic action plan (Dietitians Australia, 2017, #). Since 1992, there has been no new National Nutrition Policy in Australia. The Federal Government has committed funding to the development of a National Nutrition Policy, and we continue to urge governments across Australia to support its development. A coordinated ‘whole-of government’ approach is required to support national, state and local governments to work together with non-government organisations and civil society to tackle food insecurity, unhealthy food environments, reduce the incidence, prevalence and cost of diet-related health problems and promote health and wellbeing. A new National Nutrition Policy would look to provide food and nutrition security for all Australians with a commitment to equitable action. This policy would involve departments beyond health and consider the role of sectors such as agriculture and trade (Dietitians Australia, 2017, #).

#### Local Strategies

Dietitians Australia recognises the work many Victorian local governments are already doing in leading the way in food security and food system policies including the The FoodPATH Project (Browne et al., 2024, #), VicHealth Food for All Program 2005-2010; Bendigo’s Food System Strategy 2020-2030 (City of Greater Bendigo, 2020, #); Melbourne’s signing of the 2013 Milan Urban Food Policy Pact (MUFPP) committing to promote fairer and more environmentally sustainable foods (Food and Agriculture Organisation, 2019, #) and Sustain Australia’s activity within the state of Victoria. As outlined in the recommendations and reflections from the Food for All Program - these localised, siloed initiatives can be enhanced by a whole of state government food security policy (Urban Sustainability Exchange, n.d.).

## Governance

### Food Security Council/Committee

Dietitians Australia recognises that Victoria Health is leading the way in many food security initiatives and supports the leverage point recommendations outlined in the Consensus Statement prepared and approved by VicHealth and the Food Systems and Food Security Working Group in December 2021, including the development of a Food Systems Committee or Council to oversee the creation and implementation of a Victorian Food System Strategy and Investment Plan (VicHealth and the Food Systems and Food Security Working Group, 2022).

Dietitians Australia recommends that a Victorian Food System Strategy and Investment Plan should have a clear goal of reducing household food insecurity by 10% by 2030. To achieve this goal, the council should be given a legislative mandate that provides clear authority and capacity to affect change, clear transparent targets, performance indicators and financial capacity to support services. The Council should be required to take a responsive and democratic approach that includes consultation with industry experts and with people experiencing food insecurity. The Council should have clear lines of reporting into key government directorates to translate work into government policy and action.

## Monitoring, surveillance and screening

Data drives economies and government priorities, and without robust and ongoing information about the state of food security in Australia, no informed decision making is possible.

It is important to consider that anyone can experience food insecurity and to screen people appropriately with cultural sensitivity and safety (Lindberg et al., 2015, #). Screening of food insecurity should be incorporated into business as usual for all healthcare settings.

Food security is not measured at a population level regularly or consistently. Measures we currently have often underestimate the prevalence due to the limitations in the surveys used (Bowden, 2020, #) (McKechnie, et al., 2018, #). There are several population groups who may be more vulnerable to food insecurity. Monitoring these populations would provide essential information to identify opportunities to design strategies that would support them sustainably and for the long term. There is a critical need to implement a routine, robust food security monitoring and surveillance system in Australia using comprehensive survey questions such as the 18 Question USDA Survey utilised in the latest Food Bank Hunger Report (Food Bank, 2023, #) (Mckay et al., 2019, #).

### Monitoring food wastage

Aggregate food waste audits (which measure preparation waste, excess food, and plate waste) are important to quantify baseline waste, highlight problem areas or products within a foodservice, and monitor waste over time. The Australian National Food Waste Roadmap and feasibility study lists 47 interventions to prioritise reducing food waste. It predicts that measuring food waste is the intervention that has the second largest capacity to reduce food waste (2.69 million tonnes over 10 years). This is due to the ability to adjust procurement or design reuse and re-servicing of edible food when food waste is identified as likely (Food innovation Australia Limited [FIAL], 2021, #).

### Monitoring of food prices

Dietitians Australia calls on the Victorian government to work with the Federal government on planning and zoning of grocery stores and food retail stores to improve access and affordability (Commonwealth of Australia, 2024, #). This year, the Federal Treasury conducted an independent review to mandate the previously voluntary Food and Grocery Code of Conduct (the Code) creating a complaints pathway that enables penalties for not complying with the Code. Although this is not

specifically targeting the price of food, a fairer deal between retailers and suppliers may flow to lower prices for consumers.

## Health Equity

### Food Access

Dietitians Australia recommends reforming the emergency food relief system to ensure its efficiency and effectiveness, by reorienting to nutrition-focussed food relief and client focussed services providing pathways to food security. Food relief organisations offer a vital immediate response to the serious public health issue of food insecurity and are not a substitute for whole community or public policy level solutions to address the root cause of food insecurity (Public Health Association of Australia, 2019, #). Research shows that many people attending food relief organisations have been doing so for years, with some getting half or more of their food needs from these organisations, and many accessing support from multiple food relief organisations in the space of a year. (Seivwright et al., 2020, #) The reliance on food relief organisations may be masking a higher-level issue of cost of living, stagnant wage growth and social welfare payments below the poverty line (Mckay & Lindburg, 2019, #). Dietitians Australia recommends local homeless services be provided with a quality framework, monitoring and training to support them to include optimal food and nutrition in their service provisions. (Crawford et al., 2015, #)

Shame and embarrassment were the greatest barriers to accessing food relief support, as identified by Australians in 2023, followed by the belief that others are in greater need of assistance (Food Bank, 2023, #). The idea that “other people need it more” also speaks to the mateship and community that is integral to the Australian way of life. Addressing these and other access barriers needs to form part of efforts to reform the emergency food relief system.

When individuals have the tools they need, studies show they are better able to partake in health promoting behaviours. (McCutcheon et al., 2024). If we view equitable access to nutritionally balanced foods as a tool to combat rising levels of disease and mental illness, we empower our population to engage in positive health behaviours.

The dignity of choice is often missing from food relief initiatives, as is access to fresh produce, as these are the most difficult and expensive items for food banks to source and store (Oldroyd et al., 2022). *The Community Grocer* has been able to overcome these barriers through their *Pay it forward Gift Card Program* which converts community and corporate donations into physical and digital gift vouchers that people in need can spend at their farmers market or grocery store. Since the program launched in 2020, almost \$85,000 has funded approximately 5,000 individual vouchers to those in need.

In June 2024, 81 vouchers were redeemed across the markets with vouchers making up an average of 11% of all transactions at the market stall. Eighty-three percent of recipients of Grocer Gift Cards who were surveyed indicated that using the cards provided them with greater variety and choice compared with emergency food relief. Eighty-two percent of recipients of Grocer Gift Cards who were surveyed reported worrying about running out of food in the last week/fortnight or month, and 60% did run out of food and couldn't afford to buy more. Eighty-eight percent of recipients of Grocer Gift Cards who were surveyed reported increasing their consumption of fruit and vegetables because of having access to a Grocer Gift Card (The Community Grocer, 2024).

This highlights that community-run organisations are well equipped to design and execute programs that best suit the needs of their communities. Effective community programs, such as described above, should be further funded and supported.

Many Victorian schools are incorporating School Breakfast Clubs (Jose et al., n.d., #) and Crunch and Sip (Crunch and Sip, n.d.) to address concerns of children's food insecurity and the impact on



concentration at school with good effect. We call on the Victorian government to ensure the sustainability of these programs through adequate support and funding to continue to provide free access to nutritious foods to children in need.

#### Physical and functional barriers

Dietitians Australia highlights the role of dietitians as experts in assessing and implementing strategies to address barriers to adequate food and nutrition provision; experts that work in interdisciplinary practice with other allied health counterparts such as occupational therapists and speech pathologists. Speech pathologists can identify risks to safety due to oral motor skill deficits or diseases (e.g. dysphagia) and occupational therapists can address strategies, equipment and modifications to food-related activities to improve safety and accessibility.

Access to this interdisciplinary team is essential for many to provide alternative food and nutrition pathways or strategies (such as enteral routes of feeding through nasogastric tube or percutaneous endoscopic gastrostomy tubes). However, these methods of alternate feeding or modifications and the associated burden of medical appointments can become costly for patients, particularly for those not eligible for NDIS. Dietitians Australia highlights the importance of the Victorian government's continued support of the Home Enteral Nutrition Program and considers regular review of the tender to ensure affordability of oral and enteral nutrition supplements (*Home-Delivered Enteral Nutrition and Total Parenteral Nutrition: Funding Arrangements for Victorian Public Health Services, 2022*). Furthermore, in regional areas there can be limited access to available clinicians and resources. Dietitians Australia calls on the Victorian government to consider assessment of current capacities, waitlists of public and private allied health clinicians to review allocations of Non-Admitted Patient activity-based funding to identify areas of increased demand and need for additional FTE funding.

#### Food and nutrition literacy

Community-based nutrition education programs such as Ozharvest NEST have demonstrated improvements in food security status ( $p = 0.030$ ), cooking confidence ( $p = 0.001$ ), food preparation behaviours ( $p = 0.006$ ), nutrition knowledge ( $p = 0.033$ ), vegetable consumption ( $p = 0.043$ ), and a reduction in intake of sugar-sweetened beverages ( $p = 0.017$ ), and salty snack foods ( $p = 0.011$ ) (West et al., 2020, #). The program provides practical strategies to enable individuals to stretch their food budgets and make meaningful changes to their food utilisation (a key dimension of food security) (West et al., 2020, #). We call on the Victorian government to support and adequately fund such programs.

### First Nations knowledges & food systems

Indigenous peoples of the world have cultivated sustainable food systems for millennia, providing food, livelihoods and wellbeing to humankind (Food and Agriculture Organisation, 2021, #). The way food is produced and consumed has changed drastically over recent decades and disregards Indigenous knowledge of human–ecology interaction and its balance (Willett et al., 2019, #). To adequately achieve a sustainable food secure nation, we urge all Australian governments to connect with Indigenous knowledges of land, communities and systems thinking.

Community-based workshops held with six Aboriginal Community-Controlled Organisations (ACCOs) in urban and regional Victoria during 2022 provided a comprehensive understanding of the interconnected factors shaping food choices for Aboriginal people living in Victoria and these communities' perspectives on priority community and government actions. We call on the Victorian government to support the priority actions identified during these workshops: ban junk food marketing in all its forms; mandate nutrition and cooking education in schools; support mandating the health star rating food labelling system; support setting limits on the amount of sugar, salt and

saturated fat allowed in packaged food; and support exempting fresh foods from the goods and services tax (GST) (Browne et al., 2024, #)

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