

**Submission
No 23**

FOOD PRODUCTION AND SUPPLY IN NSW

Organisation: Public Health Association of Australia (PHAA)

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Public Health Association
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Public Health Association of Australia submission to Parliamentary inquiry on food production and supply in NSW

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The **Public Health Association of Australia** (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public's health in Australia.

The PHAA works to ensure that the public's health is improved through sustained and determined efforts of our Board, National Office, State and Territory Branches, Special Interest Groups and members.

We believe that health is a human right, a vital resource for everyday life, and a key factor in sustainability. Health equity and inequity do not exist in isolation from the conditions that underpin people's health. The health status of all people is impacted by the social, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the unfair and unjust effects of conditions of living that cause poor health and disease. These determinants underpin the strategic direction of the Association.

Our mission as the leading national organisation for public health representation, policy and advocacy, is to promote better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health. Members of the Association are committed to better health outcomes based on these principles.

Our vision is for a healthy population, a healthy nation and a healthy world, with all people living in an equitable society underpinned by a well-functioning ecosystem and a healthy environment, improving and promoting health and wellbeing for all.

The reduction of social and health inequities should be an over-arching goal of national policy and should be recognised as a key measure of our progress as a society. Public health activities and related government policy should be directed towards reducing social and health inequity nationally and, where possible, internationally.

Introduction

The Public Health Association of Australia (PHAA) welcomes the opportunity to provide input to the Parliamentary inquiry on food production and supply in New South Wales (NSW), with a specific focus on the term of reference; 1. Improving food security and equitable access to food.

Our submission summarises evidence-based literature to justify the importance of providing a policy response to address both food insecurity and food waste and its linkages to health. We include recommendations for how the NSW government's investment can achieve better health outcomes to leverage public funding more effectively.

Food insecurity affects 6.9 percent of NSW residents (New South Wales Council of Social Services 2018). The growing rates of food insecurity is associated with poorer mental health and physical health, and therefore is a crisis that requires health as a key consideration (Hughes et al. 2011; Micevski, Thornton & Brockington 2014; Whatnall, Hutchesson & Patterson 2019).

Framing the inquiry

Improving food security and equitable access to food

In Australia we produce enough food to feed an estimated 60 million people and still food insecurity affects 4 percent of the Australian population (ABS 2013; Butcher et al. 2019; FAO 2016). Food insecurity is defined as the 'limited or uncertain availability of nutritionally adequate and safe foods or limited or uncertain ability to acquire acceptable food in socially acceptable ways' (Food and Agricultural Organisation (FAO) 2008). It encompasses the dimensions of availability (the existence of food), access (being able to obtain those foods), utilisation (the foods obtained providing adequate nutrition), and stability (referring to the constancy of the other three dimensions). Disruption to any of these dimensions could constitute food insecurity. It is important that the inquiry recognises that the COVID-19 pandemic, bushfires, drought, and floods has disproportionately impacted individuals who are experiencing socioeconomic disadvantage, and experiencing poor mental or physical health, as well as living in rural and remote areas, recent migrants or asylum seekers, and people who are Aboriginal and/or Torres Strait Islanders (Booth & Smith 2001; Foodbank Australia & McCrindle Research 2020; McKay & Lindberg 2019).

Health consequences associated with food insecurity

Food security entails access to healthy, nutritious food (rather than a certain number of calories). Food insecurity has been related to poorer physical and mental health and wellbeing and includes a higher risk of elevated levels of stress, anxiety, and depression, smoking and drinking alcohol, weight gain, and malnutrition among vulnerable populations (Bruening et al. 2017; Larson, Laska & Neumark-Sztainer 2020; Martinez et al. 2019). This is often due to food insecure individuals consuming poor diets that are generally low cost including energy-dense foods (high in fat and sugar), lower amounts of plant based foods (fruits, vegetables and wholegrains), filling carbohydrates based meals; and they are more likely to ration, reduce portion size or skip meals (Gallegos, Ramsey & Ong 2014; Hughes et al. 2011; Larson, Laska & Neumark-Sztainer 2020; McKay & Lindberg 2019; Whatnall, Hutchesson & Patterson 2019).

An ongoing state of food insecurity can result in chronic diseases in later life including diabetes, heart disease, kidney disease, hypertension, obesity, nutritional deficiencies including iron deficiency anaemia, and poor mental health (Crawford et al. 2015; Larson, Laska & Neumark-Sztainer 2020; McKay & Lindberg 2019, p.2; Willis 2021; Yii, Palermo & Kleve 2020). These conditions diminish community participation and

contribute to a burden on the health system and higher health care expenditure (Farahbakhsh et al. 2017; Gallegos, Ramsey & Ong 2014; Martinez et al. 2019; Rewa, Devine & Godrich 2020).

Food security and improving the healthiness of the food environment

A broad definition of food security implies that all people have physical access to healthy and sustainable food. Therefore, the inquiry should explicitly consider both the quantity and nutritional quality of food that is available, accessed, and consumed by NSW residents when examining matters related to improving food security and equitable access to food. This inquiry presents a critical opportunity to consider the healthiness (and sustainability) of the food environment in NSW, and how it can be improved to ensure residents can access healthy, fresh food on an equitable basis. Improvements could include, for example (The Australian Prevention Partnership Centre, Deakin University and INFORMAS (2019):

- Extending policies on healthy food procurement that currently apply to NSW healthcare facilities to all NSW Government departments and settings.
- Implementing policies to restrict unhealthy food and beverage advertising in all settings controlled or managed by the NSW Government, including public transport infrastructure and sports sponsorship.
- Identifying policy mechanisms to assist local governments to limit access to unhealthy take-away foods, and to assist retail outlets to improve the healthiness of the foods supplied.

Addressing the social determinants of food insecurity and diet-related health

Food insecurity and poor dietary health is linked to a complex mix of individual-, community- and societal-level factors, including employment, access to income, and housing (Friel & Ford 2015). A comprehensive response to food insecurity must therefore consider policies on topics such as welfare and income support, housing, and employment, as well as initiatives aimed at immediately providing more (nutritious and sustainable) food to residents (Cohen & Ilieva 2021).

PHAA's response to the Parliamentary inquiry into food production and supply in NSW

The following recommendations support the Food Governance Node Parliamentary inquiry into food production and supply in NSW submission and address the four dimensions which are integral to achieve food security; availability of quality food, economic and physical access to food, food utilisation, and stability of the three dimensions over time (FAO 2008).

We recommend the NSW government invest in a new **NSW Food Security Council that includes a network of cross government and sector members to provide local, low cost and nutritious food to food insecure individuals**. At present there is no organisation in NSW whose focus is on ensuring that there is food security for individuals who are food insecure. Successful examples of coalitions that supported social, economic and policy change for community food security include the Tasmanian state-wide Food and Nutrition Coalition (Adam et al. 2016) and VicHealth's food policy coalition (VicHealth 2008).

It is additionally recommended that the NSW state government created NSW Food Security Council of experts determine the degree to which NSW policy, legislation, services, and projects represent the food security needs of low-socioeconomic populations, with a clear measurable outcome of reducing food insecurity (Adams et al. 2016). Experts should include but not be limited to NSW Council of Social Services, NSW Health, public health, urban planning, and food relief. For the NSW Food Security Council to decrease

food insecurity by 10 percent by 2025 it is recommended that they be given; legislative mandate providing clear authority and capacity to affect change, clear transparent targets, performance indicators, and financial capacity to support services (Adam et al. 2016). It is also recommended that they take a responsive and democratic approach that incorporates not only consultation with industry experts but also with individuals who are food insecure, with clear lines of reporting into key government departments to translate work into government policy and action (Adam et al. 2016).

Key areas the NSW Food Security Council could address include creating public health plans addressing insecurity (Reeve et al. 2020; Rewa, Devine & Godrich 2020). Specifically, the NSW Public Health Act 2010 does not require local government to create public health plans, unlike Victoria, South Australian and Western Australia. This legislative gap limits local government's financial and technical capacity to address this serious public health issue (Reeve et al. 2020; Rewa, Devine & Godrich 2020). The NSW Food Security Council could also ensure NSW homeless services are provided with a quality framework, monitoring or training to include food and nutrition in their service provisions (Crawford et al. 2015).

The NSW PHAA recommends the NSW government invest in the emergency food relief (EFR) agencies that enable food insecure individuals, in times of crisis, access to healthy nutritious food by socially acceptable means. One of the most common responses to address food insecurity in times of crisis is EFR initiatives in the form of pantry style services, food trucks, mobile markets, student meals and emergency relief hampers (Foodbank Australia & McCrindle Research 2020; West et al. 2020). These services offer a safety net that seeks to alleviate hunger and other impacts of poverty and is often delivered by non-government organisations (Barbour et al. 2016; Davison et al. 2020). While EFR may not solve all the problems that are facing food insecure individuals, particularly in the period of COVID-19, the top benefits of food relief include feeling less hungry (40 percent) as well as improvements in mental (27 percent) and physical (26 percent) health (Foodbank Australia & McCrindle Research 2020).

NSW state government funding provides additional support to food relief agencies to purchase consistent quantities of nutritious foods including larger amounts of plant-based foods (fruits, vegetables, and wholegrains) (Henry 2017; Larson, Laska & Neumark-Sztainer 2020; McKay & Lindberg 2019). Food bank providers will work with specific organisations including charities and community centres to revise how food relief is provided with the aim of ensuring agencies are discreet, work to alleviate stigma and protect confidentiality. Initiatives include providing a home delivery service, building food support into broader packages of resources and skills, and as part of an ongoing support relationship that people have with external organisations (McPherson 2020). However, although EFR offers a vital immediate response to the serious public health issue of food insecurity, it is not a substitute for whole community or public policy level solutions to address the root cause of food insecurity (Adams et al. 2016; Davison et al. 2020).

We have also identified key pieces of legislation that could be reformed to enable the creation of a healthier, more sustainable, and more equitable food system in NSW (Carrad et al 2021):

The NSW Government should follow the examples of Victoria, South Australia, and Western Australia by **establishing a Public Health legislative framework that sets goals and targets at the state level.** This framework would require all NSW local governments to develop a Public Health and Wellbeing Plan that explicitly sets targets and requires action on key food system priorities, including critical public health threats such as food security and diet-related health. The absence of supportive public health legislation currently limits the ability of NSW local governments to pursue policies and programs that address diet-related public health issues and can be adopted or 'scaled-up' to the state level (Adams et al. 2016; Reeve et al. 2020; Rewa, Devine & Godrich 2020).

The Government should also legislate on Climate Change (as Victoria has done), and in doing so, make clear the link between climate change and health includes food security and food systems The recommended NSW local government Public Health and Wellbeing Plans should require councils to act on both climate change and health, with an explicit focus on food systems.

NSW needs to urgently amend its planning framework, including the Environmental Planning and Assessment Act 1979 (NSW), to address local government's lack of power to approve or refuse food outlet types based on the healthiness of the food sold. This would stem the phenomenon of 'food swamps': geographical areas characterised by a high density of fast-food restaurants and a relatively low density of healthy food retail outlets, typically found in lower-income areas, on the outskirts of growing cities, and in more regional areas (Needham et al 2020). Historically, communities have been ignored in their objections to new fast-food outlets they believe will be detrimental to the welfare and public health of their communities. NSW local governments have limited powers to modify the mix of food retail outlets based on the nutritional quality of the products sold, despite strong local government, public health, and community interest in acting on this issue (Slade, Baldwin & Budge 2016).

Reforms to planning legislation and state planning instruments should also recognise and provide for urban agriculture. This could be supported by additional measures such as auditing and identifying suitable public land and creating pathways to facilitate access (e.g., rates discounts), developing dedicated grant streams for community and commercial operators, establishing a strategy and advisory group to build capacity across local and state government, and establishing new research institutes to conduct training and research.

Food governance: A significant body of research demonstrates that the corporate practices of large, transnational food companies are detrimental to public health, including the production, sale, and aggressive marketing of highly processed, energy dense, and nutrient poor products that are implicated in the global rise of obesity and diet-related non-communicable diseases (Mialon 2020). As importantly, these companies use strategies such as lobbying, legal challenges, and introducing self-regulation to forestall or weaken public health policies and regulation that would impact on their profits, and to secure ineffective forms of governance more favourable to their interests (Mialon 2020). For this reason, we recommend that processes of legislative and policy development concerned with the food system are protected from inappropriate influence by large, corporate actors in the food sector. This could include, for example, adopting recommendations for limiting industry influence and improving transparency in food policy making (on which NSW has done little to date) (The Australian Prevention Partnership Centre, Deakin University and INFORMAS 2019):

- Introducing real-time declarations of political donations.
- Modifying the government lobby register to require more detailed reporting, including details of specific lobbying activities.
- Adding food manufacturers (and associated entities) to the list of prohibited political donors.

A broad definition of food security (based on the concept of agency) also entails that food system governance processes are democratic, inclusive, and participatory, and which ensure the empowerment and participation of vulnerable groups (High Level Panel of Experts on Food and Nutrition (HLPE) 2020). Historically, disadvantaged individuals and communities (including vulnerable/migrant workers, Indigenous people, and people of colour) often lack agency within food systems and within processes of food system governance, in contrast to the disproportionate power exercised by actors such as large corporations (HLPE 2020). The NSW Government should ensure that food law and policy processes minimise power differentials and empower traditionally marginalised groups to participate (HLPE 2020), with a particular focus on facilitating meaningful participation by First Nations people.

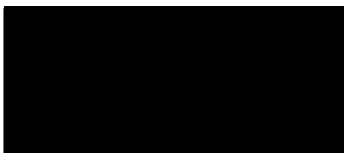
Conclusion

The NSW PHAA supports the Parliamentary inquiry into food production and supply. We would like to emphasise the following recommendations in our submission:

- Adopt a broad definition of 'food security' that: encompasses both the nutritional quality of food and total number of calories consumed; recognises the connections between food insecurity and both under- and over-nutrition; and addresses the importance of agency and sustainability for achieving food security.
- Examine both the quantity and nutritional quality of the food that is available, accessed, and consumed by NSW residents.
- Assesses how the healthiness (and sustainability) of the food environment in NSW can be improved to ensure that all residents can access healthy, fresh, and sustainable food.
- Considers interventions to address the social and economic determinants of food insecurity and poor diet-related health, including those relating to income, social welfare, and housing.
- Map all NSW government laws, policies, and regulations that are directly concerned with the food system, as well as those that impact on food system functioning, e.g., laws and policies on urban planning, agriculture, and housing.
- Puts forward to the NSW Government a comprehensive, integrated, state-wide Food System and Food Security Plan, informed by a rights-based approach.
- Ensures this Plan is implemented and overseen by a new, whole-of-government Food Systems Committee, and is accompanied by dedicated, significant funding.
- Creates a new Food Security Council with diverse representation to provide local, low cost, and nutritious food to residents.
- Invests in the emergency food relief agencies that enable food insecure individuals in times of crisis the ability to access healthy nutritious food by socially acceptable means.
- Investigates amendments to NSW's food, public health, and urban planning legislation to enable action on healthy, sustainable, and equitable food systems.

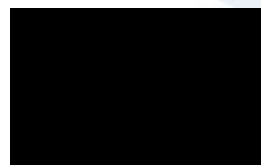
The NSW PHAA appreciates the opportunity to make this submission and commends the New South Wales Government on undertaking this inquiry, which if enacted, will play an important role in our sustainable future and public health more broadly.

Please do not hesitate to contact us should you require additional information or have any queries in relation to this submission.



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