

Centre for Policy Futures

# Response to the National Food Security Strategy ('Feeding Australia') discussion paper

## Recommendations on progressing food security through the Right to Food and inclusive food governance

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#### **EXECUTIVE SUMMARY**

This submission provides recommendations for the Australian Government's National Food Security Strategy to move beyond a narrow focus on supply chains, productivity and competition. To be effective, the Strategy must be grounded in the **Right to Food** and institutionalise **participatory food governance**. These provide the foundations for addressing the structural drivers of food insecurity - poverty, inequality, over-reliance on charity, and the exclusion of community voices from decision-making.

#### 1. Principles for the Strategy

The Strategy should embed the Right to Food, social justice and equity as guiding principles. Current framing risks treating food insecurity as a matter of supply alone, rather than a systemic outcome of poverty and inequality. A rights-based approach requires shifting away from charity and instead creating public, universal, institutional food programs. Establishing a National Food Council with strong civil society representation will ensure the Strategy reflects diverse perspectives, including First Nations peoples, small farmers, and communities experiencing food insecurity.

#### 2. Timeframes

A concurrent approach is needed: short-term (1–2 years) actions to relieve immediate food insecurity (e.g. public food programs in schools, hospitals, aged care), medium-term (3–4 years) measures to align procurement and welfare policies, and long-term integration of food, climate, housing and health agendas. Governance structures such as the National Food Council must enable adaptive policy development over time.

#### 3. Initiatives and Evidence

Our research demonstrates the value of evidence-based, participatory approaches - from community food networks and regional procurement strategies to agroecological innovation and national data observatories. These initiatives illustrate that food justice, local resilience, and democratic participation are achievable and scalable when embedded in policy.

#### 4. Key Priorities and Whole-of-System Considerations

The Strategy's priorities currently overemphasise economics and underplay equity. A fourth priority area on social equity and the Right to Food is missing. Likewise, whole-of-system considerations must explicitly include participatory decision-making, not only consumer access or workforce development. Without centring people's voice and agency, the Strategy risks entrenching existing market and/or charity-based solutions.

#### 5. Actions Under Priority Areas

- Resilience: Redefine as long-term equity and sustainability, not just crisis recovery.
- Productivity/Innovation: Measure ecological and social outcomes alongside economic ones.
- Competition/Cost of Living: Address supermarket concentration and implement values-based public food procurement.

#### 6. Whole-of-System Actions

- Health & Nutrition: Guarantee access to nutritious food through public programs, replacing reliance on charity.
- Climate & Sustainability: Invest in agroecology, regenerative production, and localised food systems.
- Trade & Markets: Ensure accountability, protect small producers, and reform procurement and retail concentration.
- People: Institutionalise participatory governance in a National Food Council, ensuring meaningful inclusion of marginalised groups.
- National and regional security: Ensure Australian labour mobility programs (e.g. PALM) meet human rights standards, and support Asia—Pacific neighbours to build rights-based food systems.



#### Introduction

The Centre for Policy Futures welcomes the opportunity to provide a response to the 2025 DAFF National Food Security: discussion paper. Our response is informed by our research into the social justice, equity and agency dimensions of food security and sustainability transformations. **We recommend that** Australia's National Food Security Strategy must move beyond a narrow focus on productivity, competition and supply chains. To be effective, it must embed the **Right to Food** and institutionalise **participatory food governance**. Food insecurity is driven primarily by poverty, inequality, supermarket concentration and an over-reliance on food charity. Addressing these systemic drivers requires a shift to universal public food programs (e.g. in schools, hospitals and aged care), values-based procurement that supports local producers, and integration of food policy with housing, climate and health agendas.

Equally important is ensuring that people experiencing food insecurity, along with First Nations peoples, small farmers, and culturally diverse communities, have a direct voice in shaping solutions. Establishing a **National Food Council with strong civil society representation** will provide the institutional capacity to adapt short, medium, and long term measures. Embedding the Right to Food and participatory governance will ensure the Strategy delivers not only resilient supply chains, but also a fair, sustainable and dignified food system for all Australians.

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

Recommendation: Embed the Right to Food, justice, and equity as governing principles of the National Food Security Strategy, to ensure it addresses the structural drivers of food insecurity - inequality, reliance on charity, and lack of participatory governance - rather than only its symptoms.

The Right to Food is defined as the right to have regular, permanent and unrestricted access – either directly or by means of financial purchases – to quantitatively and qualitatively adequate and sufficient food corresponding to the cultural traditions of the people to which the consumer belongs, and which ensure a physical and mental, individual and collective, fulfilling and dignified life free of fear. It protects people's entitlements to grow and access healthy, affordable food as well as determine their own food system through democratic governance. The Right to Food therefore has the potential to provide a way out of the food crisis by addressing the structural drivers of hunger, through key shifts towards:

- Addressing inequality as a key driver of food insecurity: Policy responses to food insecurity must recognise the broader context of rising inequality and poverty, which is particularly acute among marginalised groups such as Indigenous people, single-parent families, regional communities, refugee and migrant populations, and people with disabilities. At the same time, research shows that food insecurity is spreading across the population 73% of Australians experiencing food insecurity in 2024 did so for the first time. iii Measures to address inequality (e.g. cost of living, social services, the housing crisis, and supermarket power) are a crucial part of improving food security for the general population.
- Moving beyond food charity: Food charities should not be seen as a long-term solution to food insecurity. Australian research has shown that the expansion of food banks has "created another tier in the food relief system where charitable sector agencies have become reliant on the food bank industry"; and furthermore that they are unable to meaningfully reduce food insecurity or meet the demand for food relief. Rather, government must take a central role in providing food to those who need it through publicly run institutional food programmes.
- An inclusive and participatory National Food Council: Civic participation reduces food insecurity by amplifying the voices of those most vulnerable, increasing consciousness of food issues among policymakers and citizens, and formulating locally-based programs addressing the most pressing food systems failures. It is therefore crucially important that the development of the National Food Strategy is supported by a National Food Council with strong representation of civil society voices alongside government and industry. Furthermore, to avoid policy siloes where food is considered solely an agricultural issue, the Council should reflect a broader range of perspectives including health and nutrition, Indigenous people, women and youth, climate justice, industrial relations, and small and agroecological farmers.



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

Recommendation: The Strategy should adopt a concurrent mix of short-, medium-, and long-term measures, with scope for adaptation over time, supported by sustained financing and strong governance.

Different parts of the strategy will need to be tailored to different timeframes. For example, government-led measures to address immediate food insecurity (e.g. through food programmes in schools and other public institutions) should be targeted for delivery in 1-2 years. Supporting these measures through other elements, such as a values-based procurement policy, can be designed for the medium term (although perhaps 3-4 years rather than 5-10). Integration of food systems issues with other policy areas – e.g. climate change, housing, and Indigenous affairs – is expected to be a longer-term process. However, we note that the implementation of short, medium and long-term measures should be a concurrent and evolving process, with scope for the National Food Council to refine policies as circumstances change.

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

Through its agri-food projects and initiatives, CPF has developed evidence-based policy frameworks and transformative scenarios for sustainable and equitable food systems. The table below highlights the projects that have resulted in novel data analyses, stakeholder collaboration platforms, and concrete policy recommendations that support system-wide transformation toward more equitable and sustainable food futures.

Title	Description	Funding	Stakeholders
Fair Food Futures (2019 – 2023)	This project explores the discourses, strategies, successes and limitations of Australian community food networks for addressing food access, justice and the SDG2 Zero Hunger at local, regional, national and global levels.	Australian Research Council DECRA 2019- 2023; Future Earth 2022	Australian civil society
High-value horticulture and global production networks in coastal Australia (2022-2026)	This project examines the role of globally networked horticulture in regional development. Focusing on Australia's horticultural regions, it incorporates diverse voices to explored food security contradictions, power imbalances, and the precarity of agricultural workforces.	Australian Research Council	Sydney University, James Cook University, Griffith University and the University of Singapore
SDG-CSO Data Observatory for QLD (2023-2025)	This project digitally mapped the SDG ecosystem of Queensland's charity sector. It highlighted the need for greater integration of rights-based and systems-based approaches, and a better understanding of the contributions civil society makes to our food system.	UQ, Centre for Digital Society and Cultures, Centre for Policy Futures	SDG Global Goals (Germany) BCCIC (Canada) QCOSS (Australia)
Legacy + Sustainability: Co- designing a regional food procurement strategy for Bris2032 Olympics and beyond (2024)	This project co-creates a values-based sustainable food procurement policy for Brisbane 2032, building on the recommendations of the 2024 SEQ Food Summit to develop a roadmap for transformative food-systems impacts beyond the Olympic Games.	UQ-HASS	Food Connect Foundation Scenic Rim Regional Council University of Queensland
Digital and agricultural innovation in Australia (2020-2024)	This project examined how digital and data driven technologies and responsible innovations in agriculture are promoted and adopted, analysing the sustainability claims from the federal government, industry and private sector actors driving the agri-food R&D agenda in Australia.	CSIRO Australian Government's Research Training Program	CSIRO



## 4. Do the proposed key priority areas and whole of system considerations adequately represent the actions needed for an effective food security strategy? If not, what is missing?

<u>4a. Key priority areas</u> currently overemphasise economic aspects of food systems – productivity, competition, and supply chains – while diminishing the centrality of people. Social equity – foregrounded in a Right to Food approach – should be included as its own key priority area.

First and foremost, people cannot equitably access healthy and affordable food due to poverty. Addressing this key driver of food insecurity should be an explicit priority area, embedded in food security metrics with differentiated data on gender, Indigeneity, age, and regional/urban location. This requires policy coherence between social welfare, income reform, and the food security strategy, aligned with human rights instruments and the UN Sustainable Development Goals.

While the government rightly emphasises resilient supply chains, reliance on restoring supply and food charities does not represent a long-term solution. Similarly, focusing on productivity and innovation without considering social equity and ecological externalities risks entrenching inequalities, disproportionately affecting low-income, remote, and Indigenous communities. Market concentration in the supermarket sector further exacerbates inequitable power relations, constraining producer viability and narrowing consumer choice. Foodbank's Hunger Report 2024 viii underscores that food insecurity is systemic, not individual, with 82% of households citing cost of living as the main driver. A Right to Food approach that foregrounds social equity and food justice - ensuring that all communities have equitable access to healthy food and the power to shape a system where the benefits and risks of food are shared fairly ix – must therefore be included as a fourth priority area to ensure lasting, inclusive food security.

<u>4b. Whole-of-system considerations:</u> How a National Food Security Strategy is governed will determine whether it delivers sustainable and just outcomes. To achieve this, people's agency in food policy making – acknowledged in the discussion paper but not yet operationalised – should be added as a sixth whole-of-system consideration.

The discussion paper rightly recognises food's central role in culture, identity, and wellbeing, and acknowledges that not all Australians have equal access to nutritious food. It also highlights the vulnerabilities of low-income, remote, and marginalised groups, and points to place-based initiatives such as cooperatives and community-supported agriculture. However, the "People" consideration is framed largely around consumers, workforce development, and service provision, rather than participation, voice or empowerment. This risks treating people as passive recipients of food and policy, rather than as active agents in shaping a just and sustainable food system.

To be effective, the National Food Council and local implementation structures must institutionalise participatory governance, ensuring that historically marginalised voices – First Nations peoples, small-scale and agroecological farmers, culturally and linguistically diverse groups, and people experiencing food insecurity – are meaningfully included in decision-making. Equally important is strengthening the interface between science, lived experience, and public policy. This requires sustained investment in independent, transdisciplinary food systems research that engages directly with people experiencing food poverty. Addressing this gap will ensure governance structures advance food security outcomes that are not only productive and resilient, but also ensure the Right to Food for all.

### 5. What actions could the strategy take to address challenges under each key priority area?

**Resilience:** This should not be narrowly defined as the capacity to "bounce back" but as the ability to adapt and transform in ways that build long-term equity and sustainability. Reliance on "just in time" systems and food charities provides only short-term fixes and does not address underlying vulnerabilities<sup>x</sup>. A key action is to strengthen locally embedded food supply chains, which research shows can continue functioning during crises, while also supporting local producers and reducing vulnerability to systemic shocks<sup>xi</sup>. This should be paired with a long-term strategy to phase out dependence on food charities by embedding systemic solutions that improve equitable access to nutritious food.

Productivity, innovation and growth: Metrics must move beyond output and efficiency to capture human and ecological health



impacts, which are currently treated as externalities. A technology-first approach risks reinforcing inequities by favouring capital-intensive solutions that exclude smaller producers. A key action is to invest in measuring and scaling alternatives such as agroecology, cooperatives, and regional distribution systems that deliver sustainable livelihoods, regenerate ecosystems, and improve equitable food access. Social and environmental outcomes must be measured alongside economic performance.

<u>Competition and cost of living:</u> Market concentration in Australia's supermarket sector entrenches inequitable power relations, limiting consumer choice and suppressing fair returns for producers. Cost-of-living pressures cannot be solved by competition policy alone but require systemic interventions. A key action is values-based institutional procurement at the regional level, sourcing local, healthy food for food-insecure households while supporting local producers and reducing food miles. The strategy undertaken in Brazil under the Fome Zero (Zero Hunger) program provides an instructive example of how this could be achieved, particularly through the Food Procurement Programme and the National School Feeding Programme initiatives.

### 6. What actions could the strategy take to address challenges under these whole-of-system considerations?

Our recommendations are based on the three principles outlined in Section 1 (Right to Food, food systems beyond charity, and participatory governance).

<u>Health and Nutrition:</u> Embedding the Right to Food as a core principle to ensure everyone has access to nutritious, culturally appropriate food, through initiatives such as:

- Publicly funded/ institutional food programs (e.g., school meals, hospitals, aged care) replacing reliance on food charities, to structurally address health inequities rather than providing short-term fixes.
- Investment in place-based initiatives (cooperatives and community-supported agriculture) can improve equitable access to
  fresh food addressing geographic and socio-economic barriers. Strengthening local and regional food systems improves
  nutrition outcome in remote, regional, and low-income communities disproportionately, particularly those located in 'food
  deserts'.

<u>Climate Change and Sustainability:</u> Sustainable and regenerative food production and consumption can address climate challenges by:

- Promoting agroecology and localised supply and distribution systems that reduce emissions, regenerate ecosystems, and build resilience to systemic shocks
- Developing more equitable outcomes by measuring social and environmental impacts alongside economic measures of productivity, efficiency, and profit.
- Support regional livelihoods through values-based procurement policies that prioritise local, sustainable producers while reducing food miles.

<u>Trade and market access:</u> Prioritise justice in trade and market access arrangements through:

- Strengthening public accountability and oversight across where and how financing, investment, and innovation priorities are dedicated, ensuring a diversity of actors are platformed in decision that impact rights holders.
- Revisiting findings from the ACCC Supermarkets Inquiry (2024-2025) into market concentration in the supermarket sector, to address the systemic failures in the domestic market to protect smaller producers and improve consumer access, to be supported by challenging existing state based, regional and institutional procurement practices
- Establishing governance systems to ensure transparency in food system monitoring and evaluation outside of traditional supply and distribution chains to capture the wider impact of small and medium sized producers in supporting food security outcomes.
- Reducing food waste through coordinated policy actions that links waste reduction to environmental sustainability outcomes.

<u>People:</u> Recentre the food system as by the people and for the people. A Right to Food Framework in this instance ensures that the agency of farmers, consumers and vulnerable groups (and those most affected by food insecurity) is enhanced by:



- Ensuring the National Food Council includes marginalised groups (e.g., First Nations peoples, culturally and linguistically
  diverse communities, small-scale farmers) within the Australian food system, and not solely traditional research and
  development corporations, industry lobby and investment actors.
- Investing in independent, transdisciplinary research that connects science, lived experience, and public policy, ensuring strategies are grounded in real-world needs and evidence.

<u>National and Regional Security:</u> Internal inequities, climate risks, and reliance on charity can undermine national security just as profoundly as external geopolitical conflict and instability. Australia can strengthen both domestic cohesion and regional stability by:

- Assessing the design and implementation of labour mobility programmes (PALM, Working Holiday Maker) against human rights criteria, to protect the rights of agricultural and food processing workers coming to Australia from other countries.
- Integrating climate adaptation into food security policy by addressing risks from droughts, floods, and other extreme weather events that threaten both national stability and household food access.
- Supporting Asia—Pacific neighbours to advance the Right to Food and build rights-based food systems as a cornerstone of regional security and cooperation.

#### References

<sup>i</sup> United Nations Human Rights Office of the High Commissioner. 'About the right to food and human rights'. <a href="https://www.ohchr.org/en/special-procedures/sr-food/about-right-food-and-human-rights">https://www.ohchr.org/en/special-procedures/sr-food/about-right-food-and-human-rights</a>

<sup>ii</sup> Godrich, S. et al. (2021) Problems, policy and politics-perspectives of public health leaders on food insecurity and human rights in Australia, *BMC Public Health*, 21:1132;

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viii Gottlieb, R. and Joshi, A. (2010) Food Justice (MIT Press: Cambridge Massachusetts).

ix Murphy, M., Carey, R. and Leila, A. (2023) 'Building the resilience of agri-food systems to compounding shocks and stresses: A case study from Melbourne, Australia,' *Frontiers in Sustainable Food Systems*, 7: 1130978.

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The Centre for Policy Futures, established in 2017, is a transdisciplinary research centre situated within the Faculty of Humanities and Social Sciences at The University of Queensland. The Centre is committed to increasing UQ's impact and engagement across four main research themes: 1) environmentally sustainable futures; 2) work futures and economic security; 3) science, innovation, and society, and 4) social justice, rights and empowerment.

The Centre's objectives include developing knowledge exchange between the academic community, government, the private sector, and non-profits; pursuing rigorous research for evidence-informed policy outcomes; and contributing solutions to problems of local and national significance through applied policy relevant research.

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