

Submission on the National Food Security Strategy: Discussion Paper

Contributing authors

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Background

Thank you for the opportunity to provide a submission to the Australian Government, Department of Agriculture, Fisheries and Forestry on the Feeding Australia: National Food Security Strategy ('the Strategy').

This submission is informed by the work undertaken by the contributing authors from Queensland University of Technology, the University of Queensland and Western Sydney University, who are academics in the areas of food security, food law, climate governance, circular and sustainable economies, organisational responsibility and responsible governance, food systems governance and regulation, food justice, and First Nations health.

Food is an essential part of our society and a requirement for humans to lead healthy lives. In addition to sustaining life, our food systems contribute to the cultural and economic wellbeing of Australia. Despite the importance of food in the human experience, the framework that regulates, manages and interacts with food systems is largely focused on productivity, innovation and economics – aspects that often fail to adequately consider individuals and their rights.

Our submission highlights the need to align the Strategy with goals of social good, including those which centre on a human rights-based approach to food governance, as opposed to corporate interests and profit. Further, we outline the importance of incorporating the principle of shared responsibility into the Strategy. Shared responsibility refers to the concept that multiple stakeholders bear responsibility for achieving food security. Importantly, an effective strategy needs to specify stakeholder responsibilities and include adequate accountability measures.

In addition, our submission considers gaps in the current regulatory framework and recommends significant changes to the governance of food systems in Australia, including the appointment of a Federal Minister for Food. Our recommendations acknowledge that food systems are complex, and change requires close consideration of the necessary regulatory mechanisms.

Our research informs our answers to the discussion questions and our recommendations (summary below). The submission addresses most topics within the National Food Security Strategy: Discussion Paper ('Discussion Paper'), except for climate change and sustainability, and national and regional security.

Summary of recommendations

In response to the Discussion Paper, we make the following recommendations:

1. A human rights-based approach should be taken to the development and implementation of the Strategy.
2. In addition to a human rights-based approach, the Strategy should be informed by the principle of shared responsibility.
3. The Strategy should clearly articulate short, medium and long-term action, recognising that immediate action is needed, but that systemic change requires longer-term planning that may span beyond an elected government.
4. The short, medium and long-term actions articulated in the Strategy should be supported by evaluation and reporting obligations, with accountability for those obligations resting with a Federal Minister for Food.
5. The Strategy should include a commitment by the federal government to measure and report on whole-of-population food insecurity using a validated survey tool at defined intervals.
6. As part of the development of the Strategy, legislative reforms should be considered to address abuses of market power and/or market concentration, including provisions related to unfair trading practices.

7. As part of the development of the Strategy, the establishment of a (truly) independent body for food supply chain actors to report breaches of the Horticulture Code and the Food and Grocery Code should be considered.
8. The Strategy should explicitly recognise links between poverty, food insecurity and inadequate social security payments.
9. The Strategy should advocate for Australia to adopt an official poverty line and to increase social security payments so that beneficiaries can afford the goods and services they require to enjoy their fundamental human rights, including the right to adequate food.
10. A Federal Minister for Food should be appointed to ensure a systems-level approach is adopted and to ensure measurement and accountability for progress is centralised.
11. All levels of government, including the National Food Council, should commit to participatory food governance to ensure the inclusion of additional voices alongside government and industry, including civil society, First Nations communities and rights holders with lived experience.
12. The Strategy must focus on ensuring all people have equitable access to the mainstream food market.
13. Where food relief services are required, they must be grounded in human rights and appropriately regulated and governed with a consistent national approach.
14. The Strategy should incorporate relevant expert guidance on nutrition provided by, inter alia, the UN Food and Agricultural Organization's (FAO) *Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security*.

Questions for discussion

This submission will address each of the six questions detailed in the Discussion Paper.

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

Recommendation

1. A human rights-based approach should be taken to the development and implementation of the Strategy.
2. In addition to a human-rights based approach, the Strategy should be informed by the principle of shared responsibility.

Human rights

We submit that a human rights-based approach should be adopted to guide the development and implementation of the Strategy. Human rights as both a legal and a normative framework for food security is important because it centres people (rights holders) at the heart of governance, embeds values of equity and social justice, and imposes legally binding obligations and accountability.

The adoption of a human rights-based approach would ensure the Strategy is action-oriented and based on obligations grounded in law. Food security is not a legal concept in itself, nor does it impose binding obligations on governments to take action. Food security is a precondition to fulfilment of the human right to adequate food, and it is this right which binds States that have accepted it – including Australia – to take action to ensure the right is realised for all.¹ Human rights offer a set of guiding principles to steer the development and implementation of the Strategy, supporting Australia's compliance with its legal commitments regarding the right to food. Adopting a human rights-based national food strategy also aligns with expert international guidance provided to countries on the domestic realisation of the right to food.²

¹ *International Covenant on Economic, Social and Cultural Rights*, opened for signature 16 December 1966, 993 UNTS 3 (entered into force 3 January 1976) art 11.1

² Food and Agriculture Organization of the United Nations, *Voluntary Guidelines to Support the Progressive Realization of the Right to Adequate Food in the Context of National Food Security* (Adopted by the 127th Session of the FAO Council, November 2004); Food and Agriculture Organization, *The State of Food Insecurity in the World 2005: Eradicating World Hunger - Key to Achieving the Millennium Development Goals* (FAO, 2005); United Nations Committee on Economic, Social and Cultural Rights, 'Committee on Economic, Social and Cultural Rights, General Comments No 12: The Right to Adequate Food (Art. 11 of the Covenant), 20th Session, UN Doc E/C 12/1999/5.' 12.

We submit the following human rights principles should be considered for inclusion in an overarching human rights-based approach for the Strategy:³

Principle	Description
Participation	Food law, strategy and policy development must involve full participation of all people, especially marginalised or vulnerable people often excluded from decision-making processes (and most affected by food insecurity).
Accountability	Accountability requires transparency in decision-making processes and policy implementation. Rights holders must have access to pathways of accountability for rights violations.
Non-discrimination and equality	Everyone should have equal and equitable access to adequate food.
Empowerment	Individuals must have agency to participate in public affairs and influence system change.
Legality	Laws, institutional structures and mechanisms must ensure the right to food is recognised and justiciable.
Dignity	Eliminating food insecurity is not sufficient. Everyone must be able to eat with dignity.

The principle of shared responsibility

The Discussion Paper takes the position that responsibility for food security lies with multiple stakeholders, including governments, industry, and the community (through consultation and recommendations). This position aligns with the principle of shared responsibility. The principle of shared responsibility refers to the idea that multiple stakeholders share the responsibility for achieving food security. This principle is widely applied in many areas of policy, including disaster and environmental policy, human rights, public health, cyber security, and within legal contracting arrangements. The Discussion Paper implies sharing responsibility between these different groups but fails to specifically provide for accountability. Gaps in accountability have the potential to undermine the implementation of the Strategy. Responsibility to implement the Strategy must be shared equitably among actors (that possess the capacity), to ensure responsibility for food security is not pushed down to individuals and civil society organisations, who tend to be the least well-resourced to respond to challenges in this area.

Further, where responsibilities are shared, States maintain obligations of supervision and due diligence over non-State actors. Ultimate responsibility for the realisation of human rights lies with the State, and governments must ensure that the activities of non-State actors conform with the right to food.⁴ Violations of the right to food can be caused by third parties when they are ‘insufficiently regulated’.⁵ In this regard, we note that food systems are ‘dominated by corporations...that use wealth to generate more wealth’.⁶ The Australian Government must not allow the development of the Strategy to be dominated by corporate interests that prioritise profit over broader societal good, and hold concentrated power and resources to influence the process. Adopting a human rights-based approach will allow consideration of all perspectives, but will facilitate decision-making that is centred on individual rights holders, rather than business interests. After all, ‘corporations do business in food systems as a privilege and not a right’.⁷

³ Adapted from Katherine Keane, Hope Johnson and Bridget Lewis, ‘Rights off the Table: Exploring Food Relief Governance in Australia through a Human Rights Lens’ (2025) 48(3) *University of New South Wales Law Journal* (In Press).

⁴ United Nations Committee on Economic, Social and Cultural Rights (n 2).

⁵ See, *ibid*.

⁶ Report of the Special Rapporteur on the right to food, Michael Fakhri, A/76/237, *The right to food* (27 July 2021). Available at <https://digitallibrary.un.org/record/3936776?ln=en>.

⁷ Report of the Special Rapporteur on the right to food, Michael Fakhri, Corporate power and human rights in food systems 21 July 2025, A/80/2013. Available at: <https://www.ohchr.org/en/documents/thematic-reports/a80213-corporate-power-and-human-rights-food-systems-report-special>.

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

3. The Strategy should clearly articulate short, medium and long-term actions, recognising that immediate action is needed, but that systemic change requires longer-term planning that may span beyond an elected government.
4. The short, medium and long-term actions articulated in the Strategy should be supported by evaluation and reporting obligations, with accountability for those obligations resting with a Federal Minister for Food (see Recommendation 10).
5. The Strategy should include a commitment by the federal government to measure and report on whole-of-population food insecurity using a validated survey tool at defined intervals.

The timeframe for action is one relevant consideration for an effective strategy. However, timeframes need to be mapped against evaluation and reporting requirements as accountability measures. Without requirements to measure and report on defined actions and goals, any timeframe is merely aspirational. Regulation without enforcement does not facilitate meaningful change. This is evident in Australia's track record of previous failed attempts at an effective and enduring national food strategy. For example, the Australian Food and Nutrition Policy of 1992 was proposed to be updated after 3 years, yet this did not occur.⁸ The National Food Plan of 2013 was equally ineffective – the plan noted weaknesses in the food supply chain, including that 'the food industry may struggle to maintain continuity of food supply during a national emergency (such as a severe influenza pandemic)'.⁹ This demonstrates a pattern in Australian food governance reports and plans that acknowledge Australia's food system needs more solid proactive management by government. These reports, policies and plans represent a significant investment of time and resources, and call on expertise from around Australia. However, there remains a gap between previous attempts to establish a national approach to food governance and an effective approach, partly explicable by the previous lack of enforceable accountability provisions.

The Strategy should include mandatory and specific evaluation and reporting requirements, by a named department, to a named reporting body (such as a Minister for Food). These evaluation and reporting requirements should be tied to strategy timeframes. For example, a Strategy objective of improving food security at the population level, including in defined equity groups, should be mapped against a corresponding requirement to evaluate the effectiveness of food security interventions for equity groups and report on the effectiveness of those interventions at defined intervals. This would include, but not be limited to, a commitment by the federal government to measure and report on whole-of-population food insecurity using a validated survey tool at defined intervals.

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

The following table provides an overview of the current and recent research projects from the authors.

Current/ Recent Projects

Project	Funding Sources	Project Outcomes	Key Stakeholders
Reducing Greenhouse gas emissions from rice in Vietnam	Australian Centre for International Agricultural Research (ACIAR)	Technical capacity to measure rice emissions and informing governance arrangements to enable implementation at Ministry and Province levels.	Institute for Agriculture and Environment – Vietnam; Ministry of Agriculture and Environment – Vietnam
Reducing Greenhouse gas emissions from livestock in Fiji	ACIAR	Mapping of data sources for greenhouse gas inventory and field experiments to measure emissions from dairy cows in large-scale private sector holdings.	Ministry of Climate Change; Fiji South Pacific University; Fiji National University

⁸ House of Representatives Standing Committee on Agriculture, *Australian Food Story: Feeding the Nation and Beyond* (2023), see 'D Australian food strategies'.

⁹ Department of Agriculture, Fisheries and Forestry, *National Food Plan: Our Food Future* (Department of Agriculture, Fisheries and Forestry, 2013) <<https://faolex.fao.org/docs/pdf/aus214458.pdf>> ('National Food Plan').

Understanding trading practices affecting food loss and waste in Australia	End Food Waste CRC	Detailed overview of key trading practices contributing to FLW in Australia and what can be done to address these	Queensland Department of Environment, Tourism, Science and Innovation
Accelerating Food Transformation	End Food Waste CRC	Investigated opportunities and barriers for upcycled food in Australia, and conducted the first nationally represented consumer study on perceptions of upcycled food.	Queensland Department of Environment, Tourism, Science and Innovation
Fair Food Futures: Civil society, 'fair food' and the SDGs	ARC DECRA (2019-2024)	Investigated multistakeholder scenarios for the 'future of food' in Australia, with recommendations on the Right to Food, resilience, food justice and localising the UN SDGs.	University of Queensland; Australian civil society organisations
Horticulture in the NECS	ARC DP (2022 – 2025)	Investigates the regional impacts and dynamics of horticultural expansion in the North-East Coastal strip in Australia, with a focus on land, labour and environment.	University of Queensland Centre for Policy Futures; University of Sydney; James Cook University
Regulating the Future of Protein	ARC DECRA (2023-2025)	Investigates the regulation and politics of alternative proteins with a view to advancing knowledge about optimal ways to regulate food systems	
Governance of Food Relief in Australia: A Rights-Based Approach	QUT; Future Food Systems CRC	This PhD research project fills gaps in food governance scholarship by providing Australia's first socio-legal analysis of food relief governance.	
Feeding Healthy Minds: Universal School Lunch Programs	WSU; UOW; Macquarie; USyd	Interdisciplinary, cross-institutional research team investigating the feasibility of a school meals program for NSW	Healthy Cities Australia; Federation of Canteens in Schools Australia; FoodBank; Food Ladder; OzHarvest; Eat Up; Stephanie Alexander Kitchen Garden Foundation; Aboriginal Health and Medical Research Council; NSW Department of Health; NSW Department of Education
Food Sovereignty with Indigenous Communities	ARC DP Indigenous	Indigenous-led, interdisciplinary project which aims to develop place-based food sovereignty models for rural and urban Indigenous communities.	QUT, University of Southern Cross and Diabetes Australia

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?

No, they do not adequately represent the actions needed for an effective food security strategy. The key priority areas emphasise a productivity-driven approach to food security in Australia, whilst failing to recognise the 'equity/rights' dimensions of food insecurity and the substantial systemic food loss and waste in Australia. Sustainability 'outcomes' and the direction of change are not defined within the proposed model. As noted by Professor Michael Carolan, 'the original spirit of food security is ...understood to be but a means to an even more profound end—namely, the enhancement of individual and societal freedom and well-being'.¹⁰ A Strategy with a productivity focus that fails to adequately consider social good for individuals and society is unlikely to meet its policy objectives of achieving food security.

¹⁰ Michael S Carolan, *Reclaiming Food Security* (Routledge, 1st Eds, 2023) 17.

Whole-of-system considerations need to explicitly recognise the role of governance and regulatory oversight. At present, Australia's food production, distribution and consumption is overseen by multiple layers of government across local, state, and federal levels. The result is competing priorities, fragmented decisions, and a lack of accountability. A whole-of-system approach to food security requires policy coherence across health, climate, agriculture, economic, trade and social welfare governance.

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

Key priority areas

Resilient supply chains

Research suggests Australia has low levels of cold storage capacity per capita. This needs to be addressed to improve the resiliency of Australia's supply chain. Research by Hurst et al also noted issues with existing arrangements within the cold chain, including ownership (which places burden/responsibility on growers), transparency around correct handling procedures, and lack of coverage for this aspect of the supply chain within existing legislated industry codes.¹¹

Reliance on food charities to 'fill the gap' in food access, and on food banks to redistribute food waste, does not represent a long-term systemic solution to food system resilience.¹² Research shows that short supply chains that connect growers and eaters directly (such as food hubs, food cooperatives and farmers' markets) are crucial for transforming community-level food system resilience both during times of crisis and stability.

Ecosystem health (i.e. healthy waterways, soils, animals etc) underpins food system resilience, on which supply chains depend. Feedback loops between social-ecological systems and human health and economic systems must be strengthened in order to account for the environmental externalities of food supply chains. In this sense, it is more accurate to conceptualise the production-consumption relationship as a 'network' or 'system' rather than a linear chain.

Productivity, innovation, and economic growth

The inclusion of productivity, innovation and economic growth raises a number of issues in terms of developing a national strategy. How these goals are conceptualised and measured will significantly determine their appropriateness for inclusion in the Strategy.

Increasing food production nationally does not alleviate individual or household food insecurity, nor does it align with Australia's ambition to halve food waste by 2030. The causal link between productivity and food security is strongest in low-income countries with small-scale farming communities, where the amount of food these farms produce directly determines food access. The over-emphasis on productivity in food and agricultural law and policy has been routinely critiqued for leading to poor environmental and public health outcomes.¹³

Economic growth is not an appropriate metric for measuring food security or insecurity. Wellbeing and degrowth economics provide alternative framings to connect food system goals and outcomes with human and ecological flourishing.

There is a risk that innovation will be interpreted as technological developments that are capital-intensive, subject to private property rights and focused on increasing production in the short term. Instead, the focus on innovation should be across all food system activities and emphasise open innovation that advances sustainability and public health outcomes, such as integrated pest

¹¹ Bree Hurst et al, *Report 1: Overview Understanding Trading Practices - Understanding How Trading Practices Affect Food Loss and Waste in Australia* (Overview Understanding Trading Practices No 1, End Food Waste Cooperative Research Centre, 2025a) 51; Bree Hurst et al, *Report 2: Phase 1 Literature Review - Understanding How Trading Practices Affect Food Loss and Waste in Australia* (Literature Review No 2, End Food Waste Cooperative Research Centre, 2025b) 26; Bree Hurst et al, *Report 3: Phase 2 Interviews - Understanding How Trading Practices Affect Food Loss and Waste in Australia* (Interviews No 3, End Food Waste Cooperative Research Centre, 2025c) 31; Bree Hurst et al, *Report 4: Phase 3 'Solutions' Deep Dive - Understanding How Trading Practices Affect Food Loss and Waste in Australia* ('Solutions' deep dive No 4, End Food Waste Cooperative Research Centre, 2025d) 45; Bree Hurst et al, *Report 5: Final Report - Understanding How Trading Practices Affect Food Loss and Waste in Australia* (Final Report No 5, End Food Waste Cooperative Research Centre, 2025e) 55.

¹² Keane, Johnson and Lewis (n 3).

¹³ Food Agriculture Organization of the United Nations, 'How to Feed the World 2050: High-Level Expert Forum - Global Agriculture towards 2050' (United Nations, 2009) <https://www.fao.org/fileadmin/templates/wsfs/docs/Issues_papers/HLEF2050_Global_Agriculture.pdf>.

management or new ways of increasing fruit and vegetable consumption. Innovation should not be tied to economic growth or productivity if the goal is to enable food security and other public benefits.

For the above reasons, we suggest that productivity, innovation and economic growth metrics should address the human and ecological health impacts of unsustainable food production and consumption, with attention to improved measurement of the food security impacts of 'alternatives' such as agroecology, local distribution systems and cooperatives. A potentially related area is food upcycling. Investment in upcycled food (including manufacturing facilities, supporting growers and connecting with processors, and consumer education) could help to better utilise food and nutrients within the existing supply chain that would otherwise be wasted.

Competition and cost of living

Trading practice: Unfair trading practices and the flow-on effects for food systems

Recommendations

6. As part of the development of the Strategy, legislative reforms should be considered to address abuses of market power and/or market concentration, including provisions related to unfair trading practices.
7. As part of the development of the Strategy, the establishment of a (truly) independent body for food supply chain actors to report breaches of the Horticulture Code and the Food and Grocery Code should be considered.

While it is promising that the government has agreed in principle to recommendations from the Australian Competition and Consumer Commission's supermarket inquiry and has made the Food and Grocery Code (F&GC) mandatory, recent research by Hurst et al., (2025) found that:

- The status quo means that unfair trading practices ('UTPs') currently observed within the Australian food supply chain will not be effectively regulated, nor does Australia currently have effective mechanisms in place to address: (1) existing contractual arrangements with demand and/or facilitated overproduction, oversupply and/or food loss and waste; (2) the lack of data and/or transparency within the food supply chain, primarily for growers and processors; and (3) the lack of alternative markets.
- While a number of practices contributing to food loss and waste revealed in the research are arguably unfair, they have not been, to date, and are unlikely to be, adequately addressed under the current *Competition and Consumer Act 2010* (Cth).
- The Horticulture Code (Hort Code) and the F&GC have the potential to regulate against a number of internationally recognised UTPs in the agriculture supply chain. However, the wording of these codes, coupled with fear of retaliation, particularly with respect to the F&GC, limits their ability to effectively address UTPs.
- Existing contracting practices between retailers and growers likely result in considerable food loss and waste on farms. Of the recent amendments to the F&GC, the clause relating to forecasting is promising; however, it is not clear how this will be operationalised and enforced in practice.
- With respect to supply agreements more specifically, greater clarity is needed to understand at what point an order has occurred and what these means in terms of contracting practices.
- While necessary, competition laws may inhibit the ability of weaker actors within the agriculture and food supply chain to address UTPs.¹⁴

As noted by Hurst et al., the ability of the F&GC to effectively address UTPs, and of any other regulatory intervention to address UTPs, will continue to be limited if the F&GC allows parties to 'agree' to UTPs. The F&GC currently allows certain UTPs if parties agree to them. To address UTPs, it is necessary to adopt appropriate compliance and enforcement mechanisms, along with adequate support for

¹⁴ Hurst et al, 'Report 1: Overview Understanding Trading Practices - Understanding How Trading Practices Affect Food Loss and Waste in Australia' (n 14); Hurst et al, 'Report 2: Phase 1 Literature Review - Understanding How Trading Practices Affect Food Loss and Waste in Australia' (n 14); Hurst et al, 'Report 3: Phase 2 Interviews - Understanding How Trading Practices Affect Food Loss and Waste in Australia' (n 14); Hurst et al, 'Report 4: Phase 3 "Solutions" Deep Dive - Understanding How Trading Practices Affect Food Loss and Waste in Australia' (n 14); Hurst et al, 'Report 5: Final Report - Understanding How Trading Practices Affect Food Loss and Waste in Australia' (n 14).

regulators in relation to the Hort Code and the F&GC, as well as amendments to the *Competition and Consumer Act 2010* (Cth).

In order to address abuses of market power and market concentration in Australia's food supply chain, regulatory reform is required. Such reforms should include provisions that directly address the adverse (and often unintended) consequences of UTPs. While specific UTPs could be listed, general provisions would need to be included to ensure the breadth of UTPs occurring in the agriculture and food supply chain are captured. Importantly, these provisions would need to cover business-to-business relationships, not just business-to-consumer relationships.

In addition to regulatory reform, data transparency platforms are needed to improve demand forecasting to assist in addressing the lack of transparency that exists within Australia's food supply chain. As noted by Hurst et. al., it is clear that 'market imbalances are facilitating issues with contracting and lack of data/transparency, that these issues with contracting are compounded by the lack of data and transparency, and that the resulting overproduction and surplus these issues create is compounded by the lack of alternative markets, which results in food loss and waste'.¹⁵

Cost of living: Poverty and food insecurity

Recommendations

8. The Strategy should explicitly recognise links between poverty, food insecurity and inadequate social security payments.
9. The Strategy should advocate for Australia to adopt an official poverty line, and to increase social security payments so that beneficiaries can afford adequate the goods and services they require to enjoy their rights, including the right to adequate food.

Cost-of-living issues cannot be considered in isolation from broader income inequalities, which must be addressed if we are to properly tackle food insecurity. Food insecurity and poverty are mutually reinforcing, with food insecurity severity in Australia 'highly sensitive to income'.¹⁶ The recent Senate Inquiry into the extent and nature of poverty in Australia ('the Poverty Inquiry') heard from people with lived experience of poverty who described 'the impossible daily choices they make between food, shelter and healthcare'.¹⁷ The Poverty Inquiry noted that Australia does not currently have an official poverty line.¹⁸

With its 'redistributive character', social security can play a key role in reducing and alleviating poverty.¹⁹ Human rights require social security benefits to be 'adequate in amount and duration' so that everyone can realise their right to an adequate standard of living.²⁰ However, in Australia, increases in costs of living, including food and housing prices, have not been matched by commensurate and durable increases in social security payments.²¹ There is a direct link between above-average levels of poverty among Australian households that rely on social security payments and the insufficient level of those payments.²²

The power of adequate social security payments to address food insecurity and poverty was demonstrated during the COVID-19 pandemic. Poverty decreased notably when Australian income

¹⁵ Bree Hurst et al, *Project Summary - Understanding How Trading Practices Contributing to Food Loss and Waste in Australia* (Project Summary, End Food Waste Cooperative Research Centre, September 2025) 4, 2.

¹⁶ Michelle L Gatton and Danielle Gallegos, 'A 5-Year Review of Prevalence, Temporal Trends and Characteristics of Individuals Experiencing Moderate and Severe Food Insecurity in 34 High Income Countries' (2023) 23(1) *BMC Public Health* 2215, 11.

¹⁷ Senate Standing Committee on Community Affairs, *The Extent and Nature of Poverty in Australia* (February 2024) [1.4] <https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/PovertyinAustralia/The_extent_and_nature_of_poverty_in_Australia>.

¹⁸ Senate Standing Committee on Community Affairs, *The Extent and Nature of Poverty in Australia* (text, February 2024) 3 <https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Community_Affairs/PovertyinAustralia/The_extent_and_nature_of_poverty_in_Australia>; See also: Australian Council of Social Service and University of New South Wales Sydney, *Poverty in Australia 2023: Who Is Affected – Poverty and Inequality* (March 2023) 18 <<https://povertyandinequality.acoss.org.au/poverty-in-australia-2023-who-is-affected/>>.

¹⁹ United Nations Committee on Economic, Social and Cultural Rights, *General Comment No. 19: The Right to Social Security (Art. 9 of the Covenant)* (E/C.12/GC/19, 4 February 2008) [3] <<https://www.refworld.org/legal/general/cescr/2008/en/41968>>.

²⁰ Ibid [22].

²¹ Carol Richards, Unni Kjærnes and Jostein Vik, 'Food Security in Welfare Capitalism: Comparing Social Entitlements to Food in Australia and Norway' (2016) 43 *Journal of Rural Studies* 61, 68.

²² Australian Council of Social Service and University of New South Wales Sydney, *Poverty in Australia 2023: Who Is Affected – Poverty and Inequality* (March 2023) 18, 48 <<https://povertyandinequality.acoss.org.au/poverty-in-australia-2023-who-is-affected/>>.

support payments were expanded during the pandemic.²³ Similar trends with expanded social assistance support and associated sharp decreases in food insecurity were observed in the US during the pandemic.²⁴

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

Whole of system considerations

Recommendation

10. A Federal Minister for Food should be appointed to ensure a systems-level approach is adopted and to ensure measurement and accountability for progress is centralised.

Work done by Hurst et al., as part of a project exploring trading practices affecting food loss and waste in Australia, illustrated how at least six different government departments at the Federal level play a role in policy or legislation that could have implications for food loss and waste in Australia.²⁵ Changes in one department, without consideration of implications, trade-offs, or effects elsewhere, will limit Australia's ability to adopt a whole-of-system approach. Further, these structural issues go beyond food loss and waste. In 2021, a mapping exercise of government food-related responsibilities identified at least 11 different federal government departments involved in making food policy in Australia. In the report, *Food policy in Australia: The role of different Federal Government organisations*, Naudiyal et al., noted, 'despite the importance of food policy to public health, the national economy, and the everyday lives of consumers there is no single department or national framework that underpins or coordinates food-related activity in Australia'.²⁶

We recommend that a Federal Minister for Food be appointed to ensure a systems-level approach is adopted and to ensure measurement and accountability for progress is centralised. This approach has been recommended by multiple stakeholders, including the House of Representatives Standing Committee on Agriculture in their report, *Australian Food Story: Feeding the Nation and Beyond - Inquiry into food security in Australia*.²⁷ Such a recommendation acknowledges the complexity of the food system in Australia, noting that complex system change requires close consideration of the regulatory and structural mechanisms needed to support this change.

People

Recommendations

11. All levels of government, including the National Food Council, should commit to participatory food governance to ensure the inclusion of additional voices alongside government and industry, including civil society, First Nations communities and rights holders with lived experience.
12. The Strategy must focus on ensuring all people have equitable access to the mainstream food market.
13. Where food relief services are required, they must be grounded in human rights, and appropriately regulated and governed with a consistent national approach.

Peoples' 'agency' is acknowledged within the Discussion Paper as a core element of the food security definition, alongside availability, access, utilisation, stability and sustainability. Further, participation and

²³ P Davidson, B Bradbury and M Wong, *Poverty in Australia 2023: Who Is Affected Poverty and Inequality* (Partnership Report No 20, Australian Council of Social Service and UNSW Sydney, 2023) 41 <https://povertyandinequality.acoss.org.au/wp-content/uploads/2023/03/Poverty-in-Australia-2023_Who-is-affected_screen.pdf>.

²⁴ Diane Schanzenbach, 'The Pandemic Drop In Food Insecurity Among Families With Children', *Econofact* (online, 13 October 2022) <<https://econofact.org/the-pandemic-drop-in-food-insecurity-among-households-with-children>>; Marion Nestle, 'Food Politics and Policy' [2024] *Oxford Research Encyclopedia of Food Studies* 14.

²⁵ See Hurst et al, 'Project Summary - Understanding How Trading Practices Contributing to Food Loss and Waste in Australia' (n 18).

²⁶ Pratibha Naudiyal et al, *Food Policy in Australia: The Role of Different Federal Government Organisations* (The University of Sydney, Charles Perkins Centre, December 2021) 36, 3; House of Representatives Standing Committee on Agriculture (n 11) 7 citing Australian Institute of Food Science & Technology, Submission 85, p. 9.

²⁷ See Recommendation 2 [2.57]. House of Representatives Standing Committee on Agriculture (n 11).

empowerment are key principles of human rights with respect to the right to food (as outlined above). Participatory food governance that includes civil society and amplifies the voices of the most vulnerable (i.e. those most food insecure) is widely identified in research as effective for reducing food insecurity, shifting public policy discourse towards human rights, and ensuring greater accountability for decisions across the food system. It is therefore crucial that the development of the National Food Strategy is supported by a National Food Council with strong representation of civil society voices, First Nations communities and those with lived experience, alongside government and industry.²⁸ Currently, there are no effective participatory mechanisms for food governance at the Federal or State level, and relatively few at the local government level. We recommend a formal commitment to participatory food governance across all levels of government, including in the National Food Council.

By centring people as rights-holders at the core of the Strategy, the government is required to adopt durable solutions to individual and household food insecurity that address key underlying determinants. We submit that the Strategy should not perpetuate approaches that position food insecurity as a problem that can be solved by food relief, including by diverting food waste to food relief. Food relief can and does play an important role in the temporary fulfilment of the right to food when people are unable to meet their own individual or household food needs, and Australian civil society organisations do commendable work to deliver food relief services. However, food relief generally represents a short-term, food-based solution to a complex problem that goes beyond food, and there is little regulatory guidance for, or governance of, the sector in Australia.²⁹ Food relief represents a secondary food market, based in part on surplus foods diverted from landfill, which does not align with a human rights-based approach.

Health and nutrition

Recommendation

14. The Strategy should incorporate relevant expert guidance on nutrition provided by, inter alia, the UN FAO's *Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security*.

A human rights-based approach recognises that all rights are interdependent and interrelated. Access to adequate food is access to nutritious food, and nutritious food forms the foundation for good health. The right to adequate food and the right to health are thus closely connected.³⁰ It is not enough for policy approaches to food security to focus only on volume or metrics of food produced or created; dietary adequacy in terms of nutrition must be a key consideration, not only for food security but for public health. The Strategy should incorporate relevant expert guidance on nutrition provided by, inter alia, the UN FAO's *Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security*.³¹

Trade and market access

A rights-based strategy should position the government as the key stakeholder responsible for ensuring equitable access to affordable, healthy and nutritious food for all, rather than private markets or food charities. Government-led and rights-based institutional food procurement strategies are key mechanisms for fulfilling the right to food.

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²⁸ Molly D Anderson, 'Comparing the Effectiveness of Structures for Addressing Hunger and Food Insecurity,' in *Civil Society and Social Movements in Food System Governance* (Routledge, 1st edition, 2019) 124; Committee on World Food Security, 'CFS: Voluntary Guidelines on Food Systems and Nutrition' 12 see 3.1.4 Strengthening participation and inclusion of indigenous peoples and local communities in food systems. Food and Agriculture Organization of the United Nations (n 2).

²⁹ Keane, Johnson and Lewis (n 3).

³⁰ See for example, Ana Ayala and Benjamin Mason Meier, 'A Human Rights Approach to the Health Implications of Food and Nutrition Insecurity' (2017) 38(1) *Public Health Reviews* 10.

³¹ Food and Agriculture Organization of the United Nations (n 2) See Guideline 10, 'Nutrition'.

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