

Fair Food WA

Submission on the National Strategy for Food Security in Remote First Nations Communities Discussion Paper

8 August 2024

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Introduction

Increasingly Australian families are experiencing food insecurity, facing limited or uncertain access to food products. While food insecurity impacts many in our community, households in regional and remote areas are 30 per cent more likely to experience food insecurity than those in capital cities. In Western Australia (WA), approximately 12,000 people live in more than 200 remote Aboriginal communities. The vast nature of WA means communities in remote areas face significant and unique barriers to food access - including limited access of food types, such as fresh fruit and vegetables, limited choice, and astronomical food prices. For First Nations people living in these remote communities, the chance of experiencing food insecurity is greater than any other population group in metropolitan, regional or remote WA.

Within this context, **Fair Food WA (FFWA)** welcome the opportunity to provide feedback on the draft National Strategy for Food Security in Remote First Nations Communities (the Strategy).

Fair Food WA (FFWA) is a collaborative group working together to address food insecurity in WA. Our membership includes not-for-profit organisations, research institutes, advocacy groups, departments, and peak bodies that are committed to improving food security or contribute to WA's food relief sector. Government representatives on FFWA are not contributors on this submission.

FFWA are pleased that the Federal Government has progressed the Strategy since it was recommended by the House of Representative Standing Committee on Indigenous Affairs. The

¹ Godrich, S., Davies, C., Darby, J., Devine, A. (2017). What are the determinants of food security among regional and remote Western Australian children?

² Protocol for the Development of a Food Stress Index to Identify Households Most at Risk of Food Insecurity in Western Australia. Landrigan, T., Kerr, D., Dhaliwal, S., & Pollard, C. (2018).

³ Government of Western Australia. (2023). Remote Aboriginal communities. Accessed at <u>Remote Aboriginal communities</u> (<u>www.wa.gov.au</u>)

⁴ Godrich et al. (2017).

⁵ Health Infonet, 2018, Review of nutrition amongst Aboriginal and Torres Strait Islander People

government must continue to work in partnership with First Nations people and communities on the drafting and implementation of the Strategy and allocate resources to support continued participation.

This document details our submission on the draft Strategy, including our response to the focus areas, intended outcomes, and proposed actions. Our submission recognises the importance of ensuring the Strategy meets the needs of First Nations people and communities in WA and aligns with state priorities for food security.

Yours sincerely,

Janine Freeman

Fair Food WA (FFWA) Independent Chair

Response to Strategy Overview

This section of the submission provides feedback on the overarching elements of the Strategy including the Vision, Aim and Outcomes. Where relevant, feedback on the language used in the discussion paper has also been provided.

Vision

We believe the proposed vision is too broad. While food security contributes to achieving social, health, education and justice equity it is not the only driver of these challenges and shouldn't be presented as such. Instead, we propose the Strategy adopts a vision statement that focuses on the intended impact of the Strategy, such as: 'All remote First Nations Communities are food secure and live in environments that support good health and wellbeing'. This vision aligns with the United Nations Human Rights approach of the Right to Adequate Food, 6 clearly articulates the focus of the Strategy. It is also broad enough to consider the social determinants of health and wellbeing.

Aim

The aim introduces the concept of 'very remote community' which is not defined elsewhere in the Strategy, and only speaks to a small subset of the target cohort. We are also concerned that the aim uses urban centres as a baseline – food insecurity in urban centres remains relatively high and is increasing. FFWA suggest that the existing aim be reviewed to fit the context of the Strategy, considers remote communities, and includes an appropriate target. The aim should also be both measurable and achievable within the Strategy timeframe.

⁶ United Nations. (1966). International Covenant on Economic, Social and Cultural Rights.

Outcomes

Currently, definitions of food insecurity vary across organisations and sectors. In response to this challenge, FFWA have produced a briefing note and shared definition of food security for WA. To support a shared understanding across the six pillars of food security, FFWA recommend the following definitions are used:

- Agency: First Nations people in remote communities are empowered to participate in decision making to improve food security and influence food systems.
- Availability: Remote communities have sufficient quantities and varieties of food and essential items to meet cultural and nutritional needs.
- Access: First Nations people in remote communities have the resources to access food and
 essential items that meet cultural needs, nutritional needs, and personal preferences.
- **Stability:** First Nations people in remote communities have access to nutritious food at all times, without disruption.
- **Utilisation:** First Nations people in remote communities are able to purchase, store, prepare and consume foods that support good health and wellbeing.
- **Sustainability:** Food systems support food security in remote First Nations communities and ensure food security for future generations.

Response to Strategy Focus Areas

Focus Area 1: Country

FFWA strongly supports the inclusion of Country as a focus area of the Strategy. However, by focusing largely on local food sourcing and production, the proposed goal and intended outcomes take a narrow understanding of the important relationship between Country and food security.

First Nations community members involved in the Good Food Systems: Good for All project, offer a nuanced definition for food security which highlights the role of Country:

"Food security for us is when the food of our ancestors is protected and always there for us and our children. It is also when we can easily access and afford the right non-traditional food for a collective healthy and active life. When we are food secure we can provide, share and fulfil our responsibilities, we can choose good food knowing how to make choices and how to prepare and use it." ⁷

This definition highlights the extensive and complex nature between Country and the food system. Not only does it acknowledge the role of Country in being able to access local and traditional foods, but it also recognises the role of Country in the production and provision of nontraditional and nonlocal food items. Critically, this definition also highlights the role of food security in being able to fulfil obligations to Country – such as the need to protect Country through making good food choices – and fulfil obligations to community.

To ensure this focus area considers the nuanced role of Country in food security, we suggest the following points are considered in the Strategy.

⁷ Good Food Systems Overview. [Internet]: Menzies School of Health Research.; 2016. Available from: https://www.menzies.edu.au/icms_docs/252289_Information_sheet_1.pdf.

Policy leadership which protects Country from the impacts of climate change

The availability of local and traditional foods, particularly in regional and remote WA, is threatened by climate change. Changes to rainfall patterns and increasing prevalence of extreme temperatures mean that many local food sources are endangered, or it is no longer possible to grow food types in regional and remote areas. As outlined by the 2022 State of the Climate Report projected climate changes will continue to have significant and negative impacts on our environment, with the potential for impact to be lessened only possible by a reduction in emissions of greenhouse gases.

As such, the Strategy must include government leadership on climate policy that prioritises environmental preservation, and reduces greenhouse gas emission, to ensure that cultural food sources are sustained. If a changing climate means local food types cannot be accessed, the intended outcomes of the Strategy won't be achieved.

Food access

Whilst the health, wellbeing and social benefits of on Country activities are undeniable, the Strategy's focus on commercialising cultural food practices and emphasis on cultural food sourcing and production poses several risks if not presented alongside a commitment to broader food access.

A key concept of food security is ensuring agency. Like people in metropolitan or regional areas, people in remote communities should have ongoing access to a range of foods, enabling them to make choices about what they consume and how they obtain food. This is only possible when local food stores have an ongoing supply of healthy food at affordable prices.

It should also be noted that colonisation has caused ongoing disruption to cultural food systems and knowledge. The dislocation of knowledge and access to culturally significant lands and food sources, means that many First Nations communities may have difficulty undertaking cultural food practices as proposed by the Strategy.

Focus Area 2: Health

FFWA supports the inclusion of Health as a focus area of the Strategy, particularly as food security is integral to achieving good health and wellbeing. Within this focus area, FFWA is concerned the Strategy overemphasises a health promotion approach – focusing on providing nutrition education – rather than addressing the systemic barriers that prevent people from eating a balanced diet, such as poverty, social and cultural attitudes, and poor access to healthy foods. Several considerations related to this focus area have been included below.

A systems approach

The current Strategy emphasises the importance of good nutrition for food security. By limiting focus to the nutritional knowledge and behaviours of people in remote communities, the Strategy misses an opportunity to address drivers of food insecurity that exist across the spectrum of human health – including drivers within the determinates of health.

As outlined in the Australian Government's description of the Australian health landscape (see here), health and wellbeing of the community are underpinned by the determinates of health. It is on these foundations which other components of the system such as health promotion and disease prevention can be built. The Strategy should first consider actions that support the social

determinates of health, and then systematically address elements in each tier of the health landscape.

An example of this approach is the Health and Wellbeing Queensland's **Gather and Grow Strategy** which first prioritises healthy and accessible food systems, and then works towards promotion. As acknowledge by the Gather and Grow Strategy "only once the option of affordable healthy food is available, can the choice be made to buy it".

Food safety and foodborne illness

An important intersection between health and food is food safety. Consuming contaminated food which contains harmful bacteria, viruses, parasites or chemical substances, contributes to foodborne illness and can lead to more than 200 diseases. Food contamination can occur due to incorrect cooking temperatures, inappropriate storage, poor cleaning and sanitising techniques, and improper food handling. Each year in Australia 4.7 million cases of foodborne illness are reported, resulting in approximately 47,900 hospitalisations and 38 deaths. There is significant opportunity to reduce the burden that arises from preventable foodborne illness.

Food security and food safety are interrelated concepts, with poverty a contributing factor to both experiences. ¹¹ While particular population groups including infants, children, older people and those with existing health conditions are more vulnerable to foodborne illness, people who experience food insecurity are also at greater risk. ¹²

As outlined in the discussion paper, people living in remote communities experience several barriers to food utilisation which can lead to food contamination. For example, the House of Representative Standing Committee on Indigenous Affairs reported on the large amount of food spoilage that occurs in the supply chain when food is transported the considerable distance to remote communities. ¹³ The Strategy's approach to improving supply chain efficiency to remote communities, should consider the health impacts of food spoilage and the risk of remote residents being exposed to foodborne illness.

The Strategy should reflect the relationship between health and food safety and seek to improve remote food environments in ways that reduces the likelihood of food contamination. Access to adequate food storage, alongside suitable cooking hardware, and education to support remote

⁸ World Health Organisation. (2022). Food Safety Fact Sheet. https://www.who.int/news-room/factsheets/detail/food-safety#:":text=Key%20facts,healthy%20life%20years%20(DALYs).

⁹ Australian Institute of Food Safety. (2022). Food Safety and the Different Types of Food Contamination. https://blog.foodsafety.com.au/different-types-of-food-contamination

¹⁰ Food Standards Australia & New Zealand. (2024). Food Safety Culture.
https://www.foodstandards.gov.au/business/food-safety-culture#:":text=from%20financial%20loss.,Preventable%20problems,products%20are%20recalled%20each%20year.

¹¹ Hanning, I. B., O'Bryan, C. A., Crandall, P. G. & Ricke, S. C. (2012) Food Safety and Food Security. Nature Education Knowledge 3(10):9

¹² Njoagwuani El, Onyeaka H, Mazi IM, et al. Food safety in vulnerable populations: A perspective on the challenges and solutions. *The FASEB Journal*. 2023; 37:e22872. doi:10.1096/fj.202201713R

¹³ House of Representatives Standing Committee on Indigenous Affairs. (2020). Report on food pricing and food security in remote Indigenous Communities.

households to prepare and handle food safely, is paramount to reducing the health impacts for remote residents.

Focus Area 3: Housing

As identified by the Strategy, quality housing is an essential component to food security in remote communities.

We support the proposed outcomes and draft actions relating to housing in the Strategy. FFWA would like to reiterate the importance of co-designing housing infrastructure to ensure it meets communities cultural, health and social needs. In addition, housing stock must be climate resilient, have appropriate cooking hardware, appropriate storage (cold and dry) and be designed to reduce the cost of utilities.

Access to reliable and safe energy and water is a key component of food security and is what allows communities to prepare and store food items. It is critical that any upgrades or changes to energy and water systems take future need into consideration and supports future proofing efforts. This may mean supporting new or emerging technologies. When considering access, the Strategy must also consider cost of energy and water – there is little use making these systems accessibility if residents cannot afford to use them.

It is important to note that in WA, the electricity and water systems are the responsibility of State Government. While it is important to have national goals in the Strategy around access to energy and water, the Strategy must also consider what levers are available to ensure jurisdictions are aligned, and contributing, to these efforts.

Focus Area 4: Families and Communities

Supporting the capacity of families and communities is an important area of the Strategy. Below we outline several considerations to ensure people in remote communities are empowered to make food choices that support good health and wellbeing.

Families and communities have the knowledge and skills for food security

The Strategy should support remote communities to determine their own approaches to building the knowledge and skills required for food utilisation. This may include human resources such as an understanding of food, nutrition and basic cooking skills.

The current actions are focused on community infrastructure to support food utilisation. Whilst investment in common use infrastructure to support the safe preparation, storage and transport of food may be beneficial in some communities, this focus does not uphold the principle of community agency to determine their own responses to food insecurity challenges. For example, people in remote communities may experience several barriers when preparing a nutritious meal for themselves and their families such as access to a local food store that stocks a range of fresh foods and protein items at affordable prices, an adequate income to purchase food for the entire family, knowledge about the types of foods to purchase, a sanitary place to prepare food, appropriate cooking hardware and utensils, access to clean water and electricity, and the skills to prepare foods that meet their dietary needs and cultural preferences. Common use areas may also not be appropriate in some communities. The barriers to food insecurity will be unique to each remote community.

The Strategy should establish a flexible funding model which supports remote communities to have discretion over infrastructure investment and initiatives that build the knowledge and skills of families. This resourcing will exist alongside other aspects of the Strategy that ensure the food systems change required for remote food security.

Food relief is dignified, flexible and integrated with other services

The Strategy should assist remote communities establish a shared position on the role of food relief services in their community and build capacity to navigate and establish partnerships for food relief. This is to ensure the delivery of a food relief model which meets individual and community needs.

There are a several existing models that exemplify how this can be done. For example, Foodbank WA provide both indirect and direct food services to regional and remote communities in WA. Using a hub and spoke model, Foodbank coordinate the procurement of food relief and distribute food to partner organisations in the community. Foodbank utilise their national partnership with Coles and relationships with major freight suppliers to support the transport of food relief to remote areas. This model enables not-for-profit organisations in remote communities to determine where and how to distribute food relief based on community need. Other FFWA members including Secondbite, Ozharvest, St Vincent de Paul and The Salvation Army, are also using similar processes but do not always have the capacity to support remote areas.

Whilst food relief provides an immediate response, it does not address the underlying causes of food insecurity, particularly for people who are chronically food insecure. Food insecurity is likely to exist alongside other unmet needs but is often not well integrated with other community service areas. ¹⁴ The Strategy should assist remote communities to deliver food relief alongside wrap around supports. This could include referrals to other services, such as financial counsellors, mental health workers and legal support. This will require reviewing the capacity of existing services and providing access to sustainable funding, as well as support to build the capability of the local workforce to provide holistic and person-centred support.

Focus Area 5: Stores

Many groups have played a pivotal role in improving the relationship between remote stores and community health outcomes. To ensure sustained access to healthy and affordable food in remote communities, the Strategy must also consider the broader food environment, as outlined below.

Food outlets and the food environment

While empowering people to make healthy choices about the types and amounts of food they consume is vital to good health, good decision making must be supported by healthy food environments.

The food environment is the physical, economic, political and sociocultural context in which consumers engage with the food system. While remote stores represent one element of the food environment, the Strategy should also consider how the broader food environment will impact the types and amounts of food people consume. For example, consider what other food outlets are available to remote residents and impact food access, including takeaway venues, supermarkets, food relief programs and commercial food stores. The pricing, nutritional value, accessibility,

¹⁴ WA Food Relief Framework. (2019).

visibility, and social acceptability of the foods available at these outlets will have an impact on remote food security and nutrition.

Mapping food outlets is an important way to understand the broader food environment, and how this is impacting people's food choices. An example of this work is the <u>WA Food Atlas Project</u>. The WA Food Atlas hosts interactive maps, summary metrics and trend data showing how the food environment changes over time and informs policy changes aimed at enhancing food environments. The Strategy could support remote communities to develop similar mapping to determine the most suitable responses to creating food environments which support good health and wellbeing.

Monitoring the availability and cost of food

The Strategy should include a mechanism for monitoring the supply, range and cost of food available at all food stores in remote communities. There are currently no routine systems to monitor what foods are available and how much consumers are paying at the checkout. Ensuring transparent food access will lead to targeted strategies to support stores with food security measures. It will also provide strong evidence to support the Government with evaluating the need for policy changes such as food subsidies and remote area allowances.

Payment contingency measures

In addition to infrastructure improvements, the Strategy should support stores to establish payment contingency measures. FFWA has heard several instances where community members in WA on Income Management, including the BasicsCard, have been unable to purchase food due to Eftpos machines being out of service or power outages. It is unacceptable that community members are often left without food in these instances.

Focus Area 6: Supply Chains

It is critical that the Strategy supports efforts to effectively tackle supply chain challenges, including Federal, State and Territory Government coordination, and the prioritisation of a stable food supply to people living in remote areas. Considerations relevant to this goal are outlined below.

Consider and influence the National Freight and Supply Chain Strategy

The Australian Government's National Freight and Supply Chain Strategy and National Action Plan is an important aspect for remote food security planning. A review of this Strategy was undertaken in 2023, with several proposed changes reflecting the evolving logistics landscape. Given the need for cross-departmental responses to food security and the risk of flow on effects to the supply chain, FFWA recommend that the two Strategies be compared and opportunities to influence National freight and supply chain actions for remote food security is explored.

Some Australian jurisdictions, such as Queensland, have developed their own strategies and accompanying action plans to inform coordination of state-based freight and logistics. We encourage the Strategy to include support for Remote Communities to work with government decision makers on developing supply chain strategies that account for the unique social, environmental and geographical factors, whilst ensuring the synergies needed to achieve national coordination across the food system.

Explore the use of freight subsidies

The Strategy should include the exploration of freight subsidies to make healthy food more affordable in remote communities. Freight subsidies have already been applied in isolated parts of the country to improve supply chains and reduce the cost burden of food and other essential items. Freight subsidies should consider the consequences and impact of incentivising food supply to remote areas, with a focus on increasing the availability and affordability of healthy foods only.

In response to the high transport costs and growing cost of living in Cape York Peninsula and Torres Strait Island communities, the Torres Cape Indigenous Council Alliance commissioned a Freight Equalisation Study to assess the total freight costs of supplying good to isolated communities. ¹⁵ The study found that subsidising freight costs of household goods to remote regions could help lower costs, and evaluated two existing transport subsidy programs to determine a precedent for a household-targeted freight subsidy scheme in Far North Queensland. This work led to a commitment from the Queensland Government at the cost of living summit on Thursday Island in 2023. Under a cost of living package, \$52.6 million was committed to a remote freight subsidy and \$5.3 million to trial dedicated freight coordinators. The Scheme commenced in 2024 and eligible retailers apply to access the subsidy scheme. A 5.2% discount is then applied to eligible food and household items at the till, with the receipt showing the subsidy on each individual item to ensure price savings are transparently passed onto consumers. Freight Coordinators are responsible for management of the Scheme, whilst also collating evidence to inform further improvements to the supply chain.

Focus Area 7: Healthy Economies

Healthy economies are critical to building food secure communities. We applaud the inclusion of this focus area and agree that there needs to be a concerted effort to build economic opportunities for those living in regional and remote Australia.

FFWA supports the introduction of a sugar tax, provided it is applied equitably across the country, is coupled with education and behaviour change support, and that healthy alternatives are available at affordable prices. In addition to the activities identified in the consultation document, we encourage the Strategy to consider the role of income supports in healthy economics and the establishment of an an alcohol minimum floor price.

Equitable and sustainable Income Support Payments

As at March 2023, 5 million Australians, or 24 per cent of the population aged over 16, received income support payments, including the Aged Care Pension, JobSeeker, Youth Allowance, the Disability Support Pension, Carer Payments, or parenting payments. The low value of these payments mean that many people receiving support cannot afford the costs of essentials, including rent, food, and utility costs. For example, a single person on JobSeeker with no children is paid a maximum fortnightly rate of \$762.70, or \$54 per day.

¹⁵ Torres Cape Indigenous Council Alliance. (2023). Far North Queensland, Freight Equalisation Study. https://tcica.com.au/wp-content/uploads/2023/02/tci1241 freight-equalisation-study-final.pdf

¹⁶ Australian Institute of Health and Welfare. (2023). Income and income support. Available at: https://www.aihw.gov.au/reports/australias-welfare/income-support

We know that First Nations Australians are disproportionately impacted by the low value of income support with 285,600 First Nations peoples, or 48 per cent for Australia's First Nations people aged over 16, accessing some type of income support in June 2022. It is likely that many members of remote communities will rely on income support payments and may even experience income management.

To ensure the Strategy meets the needs of the lowest paid, it must also recognise the role of income support payments in remote economics and prioritise raising the rate of income support payments to a liveable standard. The Strategy should also promote self-determination through supporting the abolishment of compulsory income management

Introduce a National Minimum Floor Price for Alcohol Products

Alongside the introduction of a sugar taxes there is scope to consider a national minimum floor price for alcohol products. Alcohol is a particularly harmful food and beverage product, with significant impacts on our health, communities, and support systems.

Tackling alcohol-related harm requires both strong policy change and considered investment in support services. An innovative approach is the introduction of a floor price, or minimum unit price, for alcohol. Research shows a strong link between alcohol price, alcohol use levels and alcoholrelated harm, the cheaper the alcohol, the more harm our communities experience. A floor price uses this relationship to reduce the harms by decreasing the accessibility of alcohol products. A floor price is carefully set a level that raises the cost of the cheapest alcohol products at the bottom end of the market, which are often the products that cause the most harm.

This approach has already been adopted by some Australian jurisdictions, including the Northern Territory, and has been seen to have significant community benefit.

Focus Area 8: Policies, Practice and Governance

Australia has a complex food system. There are 11 government departments involved in national food system policy, ¹⁷ these include the Departments of Social Services; Agriculture, Water and Environment; Home Affairs; Treasury; Finance; Education, Skills and Employment; Infrastructure, Transport and Regional Development; Foreign Affairs and Trade; and the Department of Health. ¹⁸ Any food security Strategy must consider the role each department will play in achieving systems change and encourage effective cross-departmental work on the issue. Further consideration should be given to how the Strategy will achieve a cross-departmental response, and address the challenges outlined below.

¹⁷ Naudiyal, P., Reeve, B., Jones, A. & McDonald, S. (2022) Who is making food policy in Australia. London: Centre for Food Policy, City, University of London

¹⁸ Pratibha Naudiyal, Belinda Reeve, Alexandra Jones and Sally McDonald (2021), Food policy in Australia: The role of different Federal Government organisations. Sydney, New South Wales: The University of Sydney. ¹⁹ Bodkin Andrews, F., Walter, M., Lee, V., Kukutai, T., & Lovett, R. (2019). Delivering Indigenous Data Sovereignty (Presentation). National Indigenous Research Conference. https://aiatsis.gov.au/publication/116530

Food security data collection

There are currently no routine mechanisms to monitor the prevalence of food insecurity across the country, or in remote communities. Whilst collecting data that is relevant to the Closing the Gap Priority Reforms is important, the Strategy should also include data collection activities that will measure progress against the Strategy's overall aim.

As explored in the discussion paper, the WA Food Stress Index (FSI) provides a simple index that incorporates all aspects of food insecurity to predict the likelihood that a household in a particular geographic area will experience food stress. Food stress occurs when a household needs to spend more than 25 per cent of their weekly disposable income on food and is a precursor to food insecurity. The WA FSI combines the Australian Bureau of Statistics socio-economic indexes for areas, with food affordability and access as defined by the WA Food Access and Cost Survey (2013). The FSI shows particular geographic areas, including postcodes, statistical area, local government area, or region, where households are experiencing food stress and are more vulnerable to food insecurity. The Strategy could incorporate the routine collection of food pricing data in remote areas on a national scale, which could inform the development of an Australian Food Stress Index.

Across all areas of data collection included in the Strategy, principles of Indigenous data sovereignty should be applied, in accordance with the National Agreement on Closing the Gap. ¹⁹

Reviewing governing groups

The Strategy proposes two governance mechanisms, a National remote food security governance body, and the formation of regional food security working groups.

Whilst the establishment of localised groups to coordinate remote food security challenges has merit, it is important to note several mechanisms already exist but are either under resourced or not inclusive of First Nations organisations and groups. For example, in Western Australia, several interagency groups collaborate on issues related to emergency relief, food insecurity, poverty and homelessness. These groups are often led by volunteers from community sector organisations, or in some instances by the local government. District Leadership Groups which are made up of public

and in some instances not-for-profit sector human service agencies, are also discussing food security challenges at a regional level.

The Food Community Action groups are another example of regional working groups responding to food insecurity. The <u>WA Food Community Project</u> seeks to connect government and community stakeholders who are undertaking work to address food security. By mapping and bringing together the different initiatives in each regional community, the Food Community project improves the effectiveness of existing food security initiatives using a systems approach.

The establishment of any additional groups or governing bodies should have the appropriate structure and influence to ensure meaningful engagement with First Nations people which will contribute to alleviating food insecurity. Financial resources will also need to be allocated to support First Nations groups and Leaders to participate in any governance or consultation mechanisms.

Finally, it should be noted that under Part 5 of the *Public Health Act 2016* (WA), local government districts will be required to develop local public health plans. As food security is a critical public health issue, the National Strategy should be written in a way that supports local governments public health planning process and drives on the ground change.



Additional Comments

FFWA recommend that disaster resilience and preparedness be added to the Strategy as a key focus area. Several outcomes throughout the Strategy build disaster resilience; however, there must be a deliberate commitment to strengthening food system preparedness and community resilience to disaster impacts.

Climate change is contributing to concurrent and increasingly severe disasters, with recent events highlighting the precarity of our food system. ¹⁹ Responding to the anticipated scale of climate change impacts, particularly as disasters increase, requires a collaborative approach that supports communities to build resilience to food insecurity.

Despite rates of food insecurity increasing in times of disaster, the emergency food sector has limited access to the evidence required to adequately plan disaster response. To tackle this challenge, following on from the work of Fair Food WA, the WA Council of Social Service was awarded a National Disaster Risk Reduction grant to develop a strategic food policy and place-based planning template that could be used in state and local disaster planning. This work recognised communities' unique food needs, strengths, and existing networks, all of which can be mobilised during a disaster event which impacts food supplies.

From our work, it is evident that the Strategy should consider actions which support the community to participate in building food security preparedness in response to disaster impacts. Positioning disaster resilience and building food security preparedness as its own focus area will supports this to occur.

Contact Details

For further enquiries on this Submission please contact:

Ashleigh Gregory

¹⁹ Beros, S. (2022). A report on current and growing risks and vulnerabilities in Australia's food supply chain arising from climate change. https://farmersforclimateaction.org.au/wpcontent/uploads/2022/03/Fork-in-theRoad_V5.pdf

Western Australian Council of Social Service Whadjuk Boodja